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ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

September 3, 1982

U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Docket No. 50-317
License No. DPR-53

ATTENTION: Mr. R. W. Starostecki, Director
Division of Project and
Resident Programs

Gentlemen:

This refers to your Inspection Report 50-317/82-15, which transmitted two items of apparent noncompliance with NRC requirements. Enclosure (1) to this letter is a written statement in reply to those items noted in Appendix A of your July 30, 1982, letter.

We share your concern regarding the adequacy of our management control systems. The management control aspects of material control (pipe caps) and independent verification of system conditions following maintenance are, therefore, addressed by this response.

The corrective actions described in Enclosure (1) for Item A include equipment verifications, procedural changes, and design changes. When these actions are completed, we feel a substantial improvement in the management control systems which govern material control (pipe caps) will result.

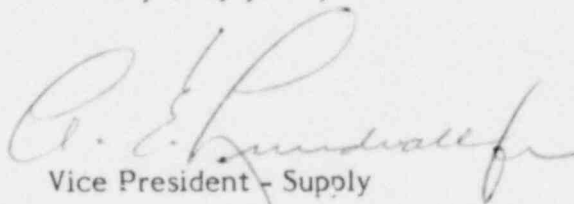
We have reviewed our management controls for independent verification of system conditions following maintenance and have determined that our existing plant procedures provide an adequate mechanism for control. However, through our review we did identify a need for further training. The underlying cause for events such as the one described in Item A appears to be a lack of awareness on the part of some people that absolutely no activities may be performed on safety related equipment unless controlled by plant procedures. Some seemingly innocuous activities can affect safety related equipment in subtle ways not obvious to all. Certainly these activities are not perceived to be malicious or subversive, nor is there any evidence to support that possibility. Instead, the acts appear to result from personnel engaged in unrelated or only loosely related work under existing plant procedures. To complete their work in a timely and efficient manner and for one specific reason or another (e.g., high temperatures or drafts in the work area and apparent deficiencies such as threaded pipes without caps) the workers may perform activities not covered by existing plant procedures.

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To ensure that such activities are conducted only under approved plant procedures, we will develop formal training on the use of procedures and the control of safety-related work. This training will be provided to operating, maintenance, quality control, selected staff (e.g. engineers and engineering technicians) and selected contractor personnel. (In the case of some contractor personnel, additional precautions will be added to their work instructions in lieu of providing training.) The training will be incorporated into each group's initial and continuing technical training program. However, some of these programs are only in the developmental stage and may not be available in the near term. As an interim measure, a special training session will be conducted by plant supervision. This special training will review the plant events related to Item A and noted in your July 30, 1982, letter along with their generic implications. We expect to complete this training by mid-October. The instruction included in the continuing technical training programs should maintain a sufficient level of awareness and understanding to prevent further occurrences of this nature.

Should you have further questions regarding the reply, we will be pleased to discuss them with you.

Very truly yours,



Vice President - Supply

AEL/DWL/gla

Enclosure

cc: J. A. Biddison, Esquire
G. F. Trowbridge, Esquire
D. H. Jaffe, NRC
R. E. Architzel, NRC

ENCLOSURE (1)

REPLY TO APPENDIX A OF NRC INSPECTION

REPORT 50-317/82-15

Item A

A review of maintenance, modification, and test activities performed during the refueling outage period when caps may have been installed on the two penetrations disclosed no record of the activities which resulted in their installation, either by intent or error. A review of procedures affecting the functional operability of these penetrations revealed adequate controls existed, with one exception: no independent verification of the condition of the four similar pressure sense lines existed.

A walkdown of the Unit 1 containment was conducted to determine whether additional pipe penetrations were subject to being similarly capped. The review concluded that only one other line, at penetration 47D - Hydrogen Sample Return Line, was similarly threaded.

The Containment pressure sense lines for Unit 2 also have threaded pipe ends. A review of operators' log readings has shown that all four redundant pressure instruments are tracking well even with small changes in containment pressure, thus indicating no lines are capped.

The Hydrogen Sampler Return Line to Unit 2 containment is also threaded. The balance of open-ended Unit 2 containment pipe penetrations will be visually checked during the Refueling Outage scheduled to begin in October 1982. This check should identify the existence of any other similarly threaded pipe ends in Unit 2.

An engineering review of the Containment pressure sense line installations has begun. This review will determine a proper facility change to aid in preventing the uncontrolled capping of these lines. Two alternatives are presently under consideration:

1. Remove the threads on the containment penetration pipe ends.
2. Add thread protecting fittings to the containment penetration pipe ends. The fittings would give the pipe a finished appearance, thereby preventing assumptions by plant personnel that the installations lack caps or any other fittings.

Regardless of the alternative chosen, permanent metal labels will be placed in the immediate vicinity of the pipe ends which identify the function of the installation and its operating condition. The labels will be in place by the end of each unit's next refueling outage.

A check of these pressure sense lines and the Hydrogen Sampler return line has been added to the containment closeout check-off list of Operating Procedure-6 "Pre-Start-Up Checkoff", to insure that the plant is not started up with these lines capped. This procedure revision provides independent verification of the proper condition of the five (5) penetrations.

ENCLOSURE (1)

REPLY TO APPENDIX A OF NRC INSPECTION

REPORT 50-317/82-15

Item B

A check of the fuel transfer tube penetration has been added to Surveillance Test Procedures STP-0-55-1 and STP-0-55-2. The required position of SFP-3 is now locked shut and capped. The handwheel has been replaced and the valve locked shut and capped. Operating Instruction-24 has also been changed to require SFP-3 to be locked shut and capped. Additionally, it has been verified that all containment penetrations are included in STP-0-55.