



Pennsylvania Power & Light Company

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Bruce D. Kenyon
Vice President-Nuclear Operations
215/770-7502

August 5, 1983

Mr. Richard W. Starostecki, Director
Division of Project and Resident Programs
U.S. Nuclear Regulatory Commission - Region I
631 Park Avenue
King of Prussia, PA 19406

SUSQUEHANNA STEAM ELECTRIC STATION
NRC INSPECTION OF JUNE 8-15, 1983
REPORT NO. 50-387/83-14
ER 100450 FILE 841-04
PLA-1774

Docket No. 50-387

Dear Mr. Starostecki:

This letter provides PP&L's response to your letter of July 12, 1983, which forwarded NRC Region I Inspection Report No. 50-387/83-14 and "Appendix A, Notice of Violation."

Your notice advised that PP&L was to submit a written reply to the violation within twenty-five (25) days of the date of the letter. In addition, your letter requested that PP&L address the actions that it has taken or will take to improve control of the use of bypasses.

Attachment 1 provides PP&L's response to the violation cited in your notice. We trust the Commission will find our response acceptable.

Very truly yours,

B. D. Kenyon
Vice President-Nuclear Operations

Attachment

cc: Mr. G. G. Rhoads - NRC Resident Inspector

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RESPONSE TO NOTICE OF VIOLATION

Violation: (387/83-14-01 and 387/83-12-05)

Unit 1 Technical Specification 3.3.9 requires that, with the reactor plant operating with the mode switch in the "Run" position, three channels of the feedwater/main turbine trip system actuation instrumentation shall be operable to cause main turbine and feedwater pump trips whenever a high reactor water level signal occurs. If all three channels of that instrumentation are inoperable, Technical Specification 3.0.3 requires that, within one hour, action be initiated to place the unit in an Operational Condition in which the Specification does not apply by placing it in at least "Startup" within the next six hours.

Contrary to the above, from about 2:48 p.m., May 24, 1983 until about 4:10 a.m., June 7, 1983, the plant was operated with the mode switch in "Run", and none of the three channels of the main turbine trip system actuation instrumentation were operable in that a high reactor water level, if it occurred, would not have caused a trip of the main turbine, only a trip of the feedwater pumps.

Response:

(1) Corrective steps which have been taken and results achieved:

- A) A review of the Bypass and System Status procedures was conducted to identify areas where the program intent could be unintentionally violated. The following actions were taken.
 - 1) AD-QA-302 (System Status and Equipment Control) was revised to specify that the system status file for each system must be reviewed prior to declaring the system operable.
 - 2) AD-QA-302 was also revised to require a review of the system status file for operational impact prior to condition changes except when entering Hot or Cold Shutdown from condition 1 or 2.
 - 3) AD-QA-307 (Electrical and Mechanical Bypass Control) was revised to require the requestor to provide operational condition impact information with respect to LCO's and potential LCO's. This includes Technical Specification references.
 - 4) AD-QA-307 was also revised to have a new Bypass Log Sheet which provides space for indicating LCO's and potential LCO's.
 - 5) AD-QA-307 was also revised to require Section Head approval for all bypasses prior to issuance.

Attachment 1
to PLA-1774

B) A training session was held with the Plant Engineering Group. At this meeting the Hi-Level Bypass event was discussed including the significance of the event, the importance of proper controls, the consequence of misuse, and the responsibilities of the requestor and operations personnel within the bypass program. The revisions to AD-QA-302 and AD-QA-307 were also discussed and explained.

C) A review of active bypasses was conducted to ensure that no additional operational impacts existed. None were identified.

(2) Corrective steps which will be taken to avoid further violations:

The procedural revisions and the training sessions mentioned above will aid in prevention of further violations. In addition, an integrated review will be performed of work management practices as they pertain to operational impacts. This is expected to be completed by January, 1984.

(3) The date when full compliance will be achieved:

As a result of the corrective actions stated above, PP&L is now in full compliance.