



Pennsylvania Power & Light Company

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Bruce D. Kenyon
Vice President-Nuclear Operations
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AUG 11 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 MAY 4 - JUNE 7, 1983
REPORT NO. 50-387/83-12; 50-388/83-06
ER 100450 FILE 841-04
PLA-1775

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 Combined Inspection Report No. 50-387/83-12, 50-388/83-06 and "Appendix A, Notice of Violation."

Your notice advised that PP&L was to submit within thirty (30) days of the date of the letter, a written reply addressing each of the violations. However, your cover letter indicated that items A.3, A.4, and A.5 had been corrected and therefore did not require a response.

Attachment 1 provides PP&L's response to items A.1 and A.2 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

A.1 Violation: (387/83-12-02)

Unit 1 Technical Specification 6.8.1.a requires establishment and implementation of procedures specified in Appendix "A" of Regulatory Guide 1.33, Revision 2, including equipment control procedures. Administrative Procedure AD-QA-306, Revision 3, System Equipment Release, requires shift supervision review of Equipment Release Form for completeness, review of plant status to determine if the work can be performed, and release of equipment for work with associated Limiting Conditions for Operation (LCOs) identified in the daily LCO log.

Contrary to the above, on May 15*, 1983, the Shift Supervisor did not control the entry into an action statement associated with the LCO limiting breaches of secondary containment integrity: work was permitted involving opening the turbine to reactor building outer access door and the inner door was periodically opened for personnel access at the same time, and no entry was made in the daily LCO log, and this activity continued for about 15 minutes until pointed out by the resident inspector.

*NOTE: May 25 is the date indicated on page 8 of this Inspection Report.

Response:

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

The work was stopped and additional instructions and controls were added to the work activity documents. Workers were cautioned not to allow both airlock doors to be opened at the same time. An additional worker was stationed in the reactor building at the inner airlock door. He maintained two-way radio communications with the other workers to coordinate personnel movements to prevent compromising secondary containment.

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

Training sessions will be held with work group planners and supervisors and operations supervisors. This training will include a discussion of the event and will emphasize that personnel involved in authorizing work activities must ensure:

- a) that the work is identified in sufficient detail on the Equipment Release Form to ensure proper review without the need to review associated work authorizations, and
- b) that work is not performed under investigative type work authorizations where work instructions are necessary to properly control the activity.

The training will be completed by September 1, 1983.

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

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

A.2 Violation: (387/83-12-01)

10 CFR 50, Appendix B, Criterion V requires that activities affecting quality be prescribed by and accomplished in accordance with appropriate instructions. The Bechtel procedure for Field Change Request (FCR) processing, FP-G-5, Revision 10, specifies in Appendix A, paragraph D, that the Project Engineer or his delegate should approve the FCR and indicate in the "Remarks" section what design changes are required for FCR implementation.

Contrary to the above, FCR C-5628 was approved by Bechtel Project Engineering on June 11, 1982, and no entry was made to indicate the design changes required to implement the FCR, and the FCR C-5628 specified notching of four drywell to suppression pool downcomer test plates to allow clearing pipe hanger interference and permit full design flow from the drywell to the suppression pool was consequently not implemented as of April 28, 1983.

Discussion:

The cited condition occurred as a result of the following:

- (1) Due to the time interval between its preparation and approval, Bechtel FCR C-5628 (which superseded an earlier FCR) was issued just after system turnover to PP&L's Integrated Startup Group (ISG). After system turnover, Bechtel no longer had jurisdiction to complete work specified by the FCR. Bechtel may issue FCR's after system turnover only if:
 - (a) Bechtel is performing work under an approved work authorization
 - (b) the FCR is prepared by PP&L's ISG, or
 - (c) the FCR is part of an approved Design Change Package (DCP).Bechtel is not otherwise permitted to issue unsolicited FCRs.
- (2) The FCR was checked "No" in the "Design Change Required" block. As a result, Bechtel processing of the FCR did not provide for submittal of the FCR to the Bechtel print room and did not include formally notifying PP&L of the change requirements.

Response:

- (1) Corrective steps which have been taken and results achieved:
 - A) Bechtel Field Procedure FP-G-5, Revision 10, has been revised by interim memoranda dated May 26 and July 7, 1983. These memoranda clarify the requirements for processing superseded, cancelled, and voided FCRs and FCNs. These requirements include submitting all FCR's and FCN's to the print room and assuring that FCR's and FCN's which have been superseded, cancelled, or voided are removed from distribution. This includes a transmittal to PP&L with instructions to remove the affected FCR or FCN. Bechtel has indicated that this change will be incorporated into the next revision of the field procedure.
 - B) An audit was conducted by Bechtel and PP&L Quality Assurance to review Bechtel Field Change Request (FCR) and Field Change Notice

(FCN) implementation. A sample of 128 FCR's and FCN's representing electrical, mechanical, I&C, piping, and civil disciplines were reviewed. No significant discrepancies were identified. In addition, Bechtel Field Engineering investigated all superseded, cancelled, and voided FCRs and FCNs. Of the several hundred involved, minor discrepancies were noted on only a few and were corrected immediately. PP&L believes that the failure to implement FCR C-5628 was an isolated case.

- C) The four affected suppression pool downcomer test plates have been notched and raised to the fully upright position. This was completed during an outage in May, 1983. The work was conducted and documented under NCR 83-465 and WA-S-34230.

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

For Unit 2

- A) Bechtel will conduct training on FP-G-5, including the changes in the interim memoranda dated May 26 and July 7, 1983. Responsible personnel are scheduled to complete the training by August 31, 1983.
- B) By an interoffice memorandum dated July 28, 1983, Bechtel will require a walkdown of the Unit 2 suppression pool downcomer test plates and will verify proper positioning prior to facility turnover currently scheduled for October 1, 1983.

For Unit 1

No further corrective actions are necessary. Future modification work will be performed in accordance with PP&L's program which we believe precludes this problem.

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

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