



# Pennsylvania Power & Light Company

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

NOV 18 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 COMBINED INSPECTION REPORT  
50-387/83-21 AND 50-388/83-14  
ER 100450 FILE 841-04  
PLA-1944

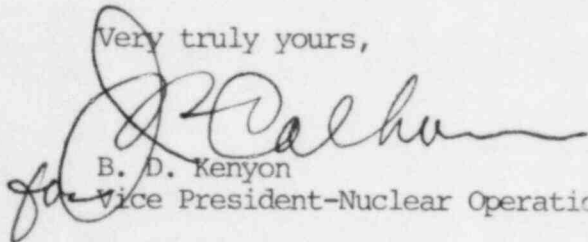
Docket Nos. 50-387  
and 50-388

Dear Mr. Starostecki:

This letter provides PP&L's response to your letter of October 27, 1983, which forwarded NRC Region I Combined Inspection Report No. 50-387/83-21; 50-388/83-14 and "Appendix A, Notice of Violation."

Your notice advised that PP&L was to submit a written reply within twenty-five (25) days of the date of the letter. We trust that the Commission will find the attached 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: (387/83-21-01)

10 CFR 50 Appendix B, Criterion VI, FSAR Section 17.2, and PP&L Operational Policy Statement 12, Revision 1 all require that procedures which prescribe activities affecting quality be used at the location where the activity is performed. Susquehanna Operations Instruction OI-24-002 Revision 0 Section 4.1 requires that an entry be made in a Diesel Generator Start Log following all start attempts (a quality activity).

Contrary to the above, at 5:20 p.m. on September 10, 1983, Emergency Diesel Generator "B" was started and, as of September 12, 1983, no entry had been made in the Diesel Generator Start Log, thereby providing a potential failure to document data related to diesel reliability.

#### Response to A.1:

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

- a. The missing log entry has been corrected.
- b. The Diesel Generator Start Log has been audited and verified to reflect actual performance of diesel generator starts.
- c. OI-24-002 has been revised to stress:
  1. Evaluation of diesel generator start attempts.
  2. Tracking of start/test failures.
  3. Notification requirements for start/test failures.
- d. On-shift Plant Control Operators have been briefed on the importance of making log entries and on the use of the newly revised OI-24-002.

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

Other diesel generator procedures will be reviewed and revised as necessary to include a step requiring log entries to be made. The revisions are expected to be completed by December 15, 1983.

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

Based on the actions in (1) above, PP&L is now in full compliance.

### A.2 Violation: (387/83-21-02)

Unit 1 Technical Specification 6.8.1.2 requires implementation of procedures specified in Appendix A of Regulatory Guide 1.33, Revision 2. Appendix A, Regulatory Guide 1.33, Revision 2, Section 9, specifies that procedures for the control of maintenance, repair, replacement and modification work should include the method for obtaining permission and

## RESPONSE TO NOTICE OF VIOLATION

clearance for operation personnel to work and for logging such work. Susquehanna Administrative Procedure AD-QA-306, Revision 3, System Equipment Release, requires the processing of an Equipment Release Form (ERF) to assure that release of safety-related or Technical Specification covered equipment for work is evaluated as to safety significance.

Contrary to the above, on August 18, 1983, release of safety-related equipment covered by the Technical Specifications was not properly evaluated as to safety significance by preparation of an ERF: Work on the common portion of the Emergency Service Water and Residual Heat Removal Service Water "A" Loop resulted in both systems becoming inoperable for less than the one hour period allowed before initiation of reactor shutdown is prescribed by the Technical Specifications.

### Response to A.2:

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

- a. Work group supervisors have been briefed on the importance of providing complete instructions for investigative type work authorizations including a review of probable consequences depending upon the nature of the investigation. In the event cited by this violation, it was not intended to render the valve or the system inoperable. Had the work group elaborated in the investigative instructions on the probable consequences of cycling the valve, the need for an ERF would have been apparent.

- b. Corrective steps which will be taken to avoid further violations:

On a continuing basis, work activities, both proposed and in progress, will be reviewed by the appropriate work groups, unit coordinators, Day Shift Supervisor of Operations, and the Operations Shift Supervisors. These reviews coupled with the lessons learned from this event should be effective in preventing future violations.

- c. The date when full compliance will be achieved:

Based on the action in (1) above, PP&L is now in full compliance.

### A.3 Violation: (388/83-14-01)

10 CFR 50 Appendix B, Criterion V, and PP&L Quality Assurance Manual Procedure 6.1, Revision 7 requires that activities affecting quality be accomplished in accordance with documented instructions or procedures.

Contrary to the above, a safety-related bracket on Conduit E2P136 in Room Z-17, Area 32 Elevation 645 was removed as of September 22, 1983 without any documented instruction or procedure to perform the work.

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Response to A.3:

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

- a. The conduit affected by the missing support has been evaluated for compliance to Electrical Specification E-53, "Seismic Class I Trays and Conduit Supports Notes and Details." It has been determined that the maximum span without this support installed is in compliance with E-53. Loading calculations were performed on the next-up conduit support and have been found to be acceptable without reinstallation of the missing support. The missing support is therefore not required and will not be replaced.
- b. In addition to room Z-17, two additional rooms were inspected immediately. No other missing conduit supports were identified.

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

The reason for the missing support has not been determined. However, it is felt, based on (1) above, that this was an isolated event. Therefore, no further corrective actions are necessary.

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

Based on the actions in (1) above, PP&L is now in full compliance.