



CHARLES CENTER • P. O. BOX 1475 • BALTIMORE, MARYLAND 21203

ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

December 6, 1983

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

Docket Nos. 50-317
50-318
License Nos. DPR-53
DPR-69

ATTENTION: Mr. Thomas T. Martin, Director
Division of Engineering & Technical
Programs

Gentlemen:

This refers to Inspection Report 50-317/83-26, 50-318/83-26; which transmitted an item of apparent noncompliance with NRC requirements. Enclosure (1) to this letter is a written statement in reply to the item noted in your letter of November 9, 1983.

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

Very truly yours,

AEL/LOW/gla

Enclosure

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

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PDR ADOCK 05000317
G PDR

ENCLOSURE (1)

**REPLY TO APPENDIX A OF NRC INSPECTION
REPORT 50-317/83-26; 50-318/83-26**

We have completed our review of the subject noncompliance item involving failure to properly reposition the Spent Fuel Pool Cooler (SFPC) service water valves following performance of Surveillance Test Procedure (STP) 0-7-1. This incident involved two areas where failure to fully implement a portion of an existing procedure and procedural inadequacies resulted in the identified item of noncompliance. As a result of our review, we have taken corrective actions specified below to ensure that incidents similar to those described are not repeated in the future.

1. STP 0-7-1 has been revised to meet the requirements of Operating Instruction-15. This revision has resulted in changes ensuring that: (a) the service water inlet valve to #11 SFPC is returned to its pretest position when the Containment Spray Actuation System (CSAS) testing is completed, and (b) the service water outlet valve from #11 SFPC is placed in the open position when CSAS testing is completed. To ensure proper implementation of the STP, the operator performing the test is now required to initial and date each step of the procedure as it is performed. Full compliance was achieved on November 1, 1983.
2. All operational STPs are being reviewed by Senior Licensed personnel to ensure that similar incidents do not occur. The purpose of this review will be to detect any inconsistencies and initiate revisions similar to those performed on STP 0-7-1. We anticipate that this review will be completed by June 30, 1984.
3. Regarding the failure to implement a portion of approved procedures, following the incident, the General Supervisor - Operations counseled the operator involved in the incident relaying management concerns as to the necessity for proper procedure implementation. To emphasize those concerns, the individual involved was required to prepare a Personnel Incident Report describing the incident and suggesting corrective actions. This report has been distributed as "required reading" to all Operations personnel.