



Pennsylvania Power & Light Company

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

March 21, 1984

Dr. Thomas E. Murley  
Regional Administrator, Region I  
U.S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, PA 19406

SUSQUEHANNA STEAM ELECTRIC STATION  
RESPONSE TO TMI AUDIT  
ER 100450 FILE 841-04  
PLA-2133

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Docket Nos. 50-387  
and 50-388

Dear Dr. Murley:

This letter responds to a request by Mr. John White of your office following an NRC audit of several TMI items during the week of March 5, 1984. The attachment to this letter provides a list of actions and provides a proposed schedule for completion of these actions. We trust that the Commission will find this response acceptable.

Very truly yours,

B. D. Kenyon  
Vice President-Nuclear Operations

Attachment

cc: R. L. Perch - USNRC Bethesda  
R. H. Jacobs - USNRC Resident  
J. White - USNRC Region I

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### II.B.3 Post Accident Sampling System

1. Issue "Functional Test Procedure" for semi-annual test of PASS to include complete test of system.

Response: The procedure will be issued by Unit 2 initial criticality.

2. Issue "Transportation of Samples" procedure.

Response: The procedure will be issued by Unit 2 initial criticality.

3. Issue "Backflushing of Lines" procedure.

Response: The procedure will be issued by Unit 2 initial criticality

4. Issue "Analyzing High Iodine Samples" Procedure

Response: The procedure will be issued by Unit 2 initial criticality.

5. Confirm the representativeness of containment air iodine samples.

Response: PP&L will confirm the representativeness of the Unit 1 and 2 systems by the end of the Unit 1 first refueling outage.

6. Establish preventive maintenance program and spare parts list for PASS to include electronic and/or radiological calibration of all instruments, as appropriate.

Response: The program and spare parts list will be implemented for both units by December 31, 1984. All instruments will have current calibration prior to performing the next semi-annual test on each unit, respectively. These tests are currently scheduled for October, 1984.

7. Resolve issue involving a pipe cap on one containment sample line with respect to flow observed during sampling.

Response: During the week of March 5, 1984, an NRC inspector discovered a pipe cap hand tight on one of the PASS sample lines. It has been determined that the pipe cap had been removed in October, 1983. This was verified in December, 1983, during performance of P279.7A, "Containment Radiation Monitoring System." No explanation for the cap being replaced has been determined.

During a test conducted March 13, 1984, the sample pump was run with SV-22368 closed. Over a five minute time span, the pump drew the line down to 14" Hg vacuum at 10 SCFM. This lengthy draw down time resulted due to the relatively large volume of the pipe and low flow rate of the pump. This explains why, during the NRC demonstration, no problem with flow was observed since the pump was only run for one minute and there was probably some leakage past the hand tightened pipe cap.

8. Resolve problem with interlock actuation resulting from improper fit-up of the Unit 2 small volume cask on the Unit 1 station.

Response: This problem will be corrected by Unit 2 initial criticality.

9. Perform time/motion study to determine resultant dose/exposure rates from drawing and analyzing a PASS sample.

Response: The study will be completed by June 1, 1984.

10. Investigate and resolve discrepancies between critical orifice flow and flow indicator.

Response: Flow will be matched between related instruments on Unit 1 by April 6, 1984, and on Unit 2 by initial criticality.

11. Repair Unit 1 gas sampling equipment.

Response: The Unit 1 gas sampling equipment will be fully functional by April 6, 1984.

12. Perform functional test of Unit 1 PASS with jet pumps as sample source.

Response: A functional test of the Unit 1 PASS will be performed after Unit 1 is returned to service. The test is currently anticipated to be performed in early April, 1984.

13. Revise EP-IP-046 to correct valve numbers.

Response: EP-IP-046 has been corrected.

14. Revise chemistry procedures to provide for correct installation of iodine sample cartridges and O-rings.

Response: The procedure has been changed.

#### 11.F.1 Accident Monitors

1. Develop a correction curve for the high end of the scale of the high range noble gas SPING monitors.

Response: A correction curve will be developed by Unit 2 initial criticality.

2. Calibrate the Unit 2 high range noble gas SPING monitors using appropriate sources.

Response: The monitors will be calibrated by Unit 2 initial criticality.

3. Confirm the representativeness of SPING iodine samples.

Response: PP&L will confirm the representativeness of iodine samples by the end of the Unit 1 first refueling outage.

4. Perform assessment and schedule corrective actions for handling and assessing SPING "hot" samples.

Response: The assessment and schedule will be submitted by June 1, 1984.

5. Evaluate access problems to SPING monitors during accident conditions.

Response: PP&L will provide an assessment of access problems including a proposed schedule for resolution by June 1, 1984.

6. Perform a source calibration on the containment high radiation monitors at 10R or less.

Response: The Unit 1 containment high radiation monitor has been properly calibrated. The Unit 2 monitor will be calibrated by Unit 2 initial criticality.

7. For containment high radiation monitors, correct electrical separation problems on system prints.

Response: Appropriate print changes will be initiated by Unit 2 initial criticality.