



Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101 • 215 / 770-5151

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

APR 12 1984

Mr. Thomas T. Martin, Director
Division of Engineering and Technical Programs
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

SUSQUEHANNA STEAM ELECTRIC STATION
NRC INSPECTION REPORTS 50-387/84-05
AND 50-388/84-06
ER 100450 FILE 841-04
PLA-2171

Docket Nos. 50-387
50-388

Dear Mr. Martin:

This letter provides PP&L's response to your letter of March 13, 1984, which forwarded NRC Region I Combined Inspection Reports 50-387/84-05 and 50-388/84-06 with Appendix A, Notice of Violation.

Your Notice advised that PP&L was to submit a written reply within thirty (30) 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

Attachments

cc: Mr. R. H. Jacobs - NRC Senior Resident Inspector
Mr. J. J. Kottan - NRC Region I Inspector

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RESPONSE TO NOTICE OF VIOLATION

Violation (387/84-05-02)

Appendix "A" to License No. NPF-14, Technical Specifications, Section 6.8.1, requires written procedures shall be established, implemented and maintained covering the activities of Appendix "A" of Regulatory Guide 1.33, Revision 2, February, 1978. Appendix "A" of Regulatory Guide 1.33 requires chemistry and radiochemistry procedures.

Chemistry Procedure CH-IC-005, "Gas Flow Proportional Counter Calibrations", written pursuant to the requirements of Section 6.8.1 of the Technical Specifications, requires that the counter high voltage operating point be set at the midpoint of the first 100 volts on the plateau curve where the slope is calculated to be between 1% - 2% or less. The gas flow proportional counter is used for performing Technical Specification required analyses of reactor water.

Contrary to the above requirements, Procedure CH-IC-005, has not been implemented in that the high voltage operating point is set by visual observation rather than by calculating the slope as required.

Response:

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

The Gas Flow Proportional Counter was determined to be operating at the correct operating voltage. The method of previously determining the operating voltage, although not in conformance with the approved procedure, produced an acceptable result. The technicians were reminded to comply with all applicable parts of procedures and the proper way to initiate procedure changes.

(2) Corrective steps which have been taken to avoid further violation:

Procedure CH-IC-005 was reviewed and a change was made to the method for determining proper operating voltage to reflect the preferred method used by the technicians.

(3) Date of Full Compliance:

In accordance with the above actions, PPF-1 is in full compliance.