



Pennsylvania Power & Light Company

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

MAY 03 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
IE BULLETIN 84-02 RESPONSE
ER 100450/100508 FILE 842-03
PLA-2153

Docket Nos. 50-387
50-388

Reference: (1) PLA-708 dated April 3, 1981
(2) PLA-990 dated December 31, 1981

Dear Dr. Murley:

This letter is PP&L's complete response to IE Bulletin 84-02, "Failures of General Electric Type HFA Relays in Use in Class 1E Safety Systems."

The deficiency noted in the bulletin involving General Electric HFA relays was determined by PP&L to be reportable under 10CFR50.55(e). A report by telephone to Mr. R. T. Carlson of NRC Region I by Mr. A. R. Sabol of PP&L was made on February 6, 1981. Reports pursuant to 10CFR50.55(e) were submitted under References (1) and (2).

HFA relays are used at Susquehanna in safety related and non-safety related systems. In 1981, PP&L commenced the replacement of all Class 1E HFA relays at Susquehanna. These replacements came in one of two forms:

1. The Lexan coils were replaced with Tefzel coils.
2. The HFA relay itself was replaced with the Century Series HFA relay which contains a Tefzel coil.

The replacements were completed prior to fuel load on each unit.

The replaced coils and relays were retained for spares for HFA relays in non-safety related systems. These spares are tagged for use in non-safety related systems only. The control of these parts is covered under PP&L's defective device program.

Our resolution of this issue on Unit 1 is covered in NRC Inspection Report 387/82-19. Unit 2 is covered in NRC Inspection Report 388/84-13.

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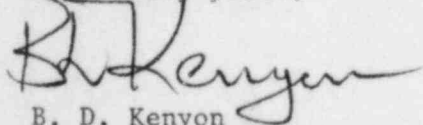
Dr. Thomas E. Murley

In response to the bulletin's request to review the general concerns expressed in the bulletin regarding service life of safety related relays for applicability at Susquehanna:

- (1) PP&L receives information regarding defective devices through such sources as IE Information Notices, IE Bulletins, GE Service Advice Letters, GE Service Information Letters, Bechtel Problem Investigation Requests, etc. The information passed on to PP&L from these sources is evaluated and action is taken accordingly.
- (2) PP&L has conducted an extensive preoperational test program. This program cannot by itself identify end-of-service life failures, but it can identify contributors to the reduction of useful service life.
- (3) PP&L's Equipment Qualification Program is designed to insure that all Class 1E equipment is capable of operating under normal, accident, and post-accident conditions. One of the results of the analysis and testing of a Class 1E component under this program is determination of the useful service life of that component in a particular environment. The minimum environment for which each component has to be qualified is the worst case (or combination of worst case) design basis event environment(s) for which the equipment is required to perform a safety function. Aging was considered in all cases and is included in the qualification where it has a detrimental effect on the equipment's ability to function. If the useful service life is deemed to be less than the 40 year life of the plant, the PP&L computerized preventative maintenance program is used to insure replacement of components and subcomponents prior to the end of their qualified service life.
- (4) PP&L maintains an on-going surveillance program which monitors the performance of safety related components and systems. This program can detect component degradation while in service and will help to reveal any useful life deterioration over and above the deterioration expected.
- (5) In conclusion, PP&L feels confident that the combination of the activities discussed in items (1) through (4) above should assure the proper operation of Class 1E components or detect the deterioration of the useful service life in these components before a safety concern develops.

This letter completes our actions on IE Bulletin 84-02.

Very truly yours,



B. D. Kenyon
Vice President-Nuclear Operations

Affidavit

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Dr. Thomas E. Murley

Copy to:

Mr. Richard C. DeYoung
Director-Office of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. R. H. Jacobs
U.S. Nuclear Regulatory Commission
P.O. Box 52
Shickshinny, PA 18655

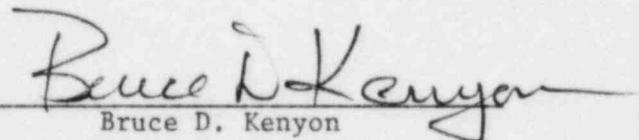
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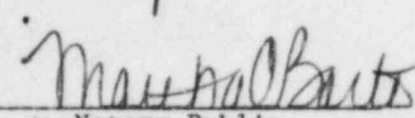
COMMONWEALTH OF PENNSYLVANIA)

COUNTY OF LEHIGH : SS
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I, BRUCE D. KENYON, being duly sworn according to law, state that I am Vice President, Nuclear Operations of Pennsylvania Power & Light Company and that the facts set forth on the attached response by Applicants to IE Bulletin 84-02 are true and correct to the best of my knowledge, information and belief.


Bruce D. Kenyon
Vice President-Nuclear Operations

Sworn to and subscribed
before me this 3rd day
of May, 1984.


Notary Public
MARSHA C. BARTO, Notary Public
Allentown, Lehigh County, Pa.
My Commission Expires Jan. 13, 1986