



Pennsylvania Power & Light Company

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

FEB 25 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 50-387/83-31
AND 50-388/83-31
ER 100450
PDR-2087

FILE 841-04

Docket Nos. 50-387
50-388

Dear Mr. Martin:

This letter provides PP&L's response to your letter of January 27, 1984, which forwarded NRC Region I Combined Inspection Reports 50-387/83-31 and 50-388/83-31 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,

for B. D. Kenyon
Vice President-Nuclear Operations

Attachments

cc: Mr. R. H. Jacobs - NRC Senior Resident Inspector
Dr. P. K. Eapen - NRC Region I Inspector

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RESPONSE TO NOTICE OF VIOLATION

Violation: (387/83-31-04 and 388/83-31-04)

10 CFR Part 50, Appendix B, Criterion XV, states: "Measures shall be established to control materials, parts, or components which do not conform to requirements in order to prevent their inadvertent use or installation. These measures shall include, as appropriate, procedures for identification, documentation, segregation, disposition, and notification to affected organizations. Nonconforming items shall be reviewed and accepted, rejected, repaired or reworked in accordance with documented procedures."

Licensee's procedure NDI-QA-8.1.5 (Revision 1), paragraph 6.2.5, for implementing this criterion for Non-Conformance Reports (NCR's) states: "Disposition of NCR's by the responsible/dispositioning organization shall be provided within 30 days although circumstances may dictate that more immediate action is required. If more than 30 days are required to disposition an NCR, the dispositioning organization shall provide the Responsible Quality Control Supervisor, and other involved groups with a status report that details the action being taken, any interim controls and the date when the disposition will be completed."

Contrary to this on December 2, 1983, the dispositioning organizations for NCR 83-779 and NCR 83-1190, issued respectively on August 11, 1983, and October 21, 1983, provided neither the required dispositions within 30 days nor the status reports required when more than 30 days are needed to disposition the NCR's. In addition, 157 similar examples were also found.

Response:

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

- a) Status reports for NCRs 83-779 and 83-1190 were received by the QC Supervisor on February 1, 1984 and January 31, 1984, respectively. These status reports identify March 10, 1984 and March 31, 1984 as the dates when dispositioning will be completed.
- b) Prior to the Inspector's identification of the noncompliance, PLNQA Staff Auditing, in Audit IA-83-16 "Non-conformance Control," had identified a condition where the required status report had not been submitted for 11 NCRs that were not dispositioned within 30 days. This audit was transmitted to the Superintendent of Plant via PLI-29457 on November 15, 1983. The Superintendent responded identifying the following corrective measures which were already in process at the time of the NRC inspection:
 - o Procedure Change Notice (PCN) 1-83-1419 to Plant Procedure AD-QA-120 was issued on November 22, 1983. This PCN provided a form to be utilized by dispositioning organizations to provide status reports for those NCRs for which dispositioning could not be completed within 30 days.
 - o Responsible Groups are notified by the Plant Compliance Group and the QC organization, via Monthly NCR Status Reports, that they have outstanding NCRs for which a

disposition was not provided within 30 days and that either a disposition or status report is required.

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

- a) In addition to the formal status report mechanism provided via PCN 1-83-1419 and the issuance of individual Monthly NCR Status Reports by the Plant Compliance Group and the QC organization, an NCR Task Force was created in January 1984. This task force meets 2 or 3 times a week to review the current status of NCRs and to assign priority categories for their closure. Currently, this task force is primarily involved in resolving NCRs associated with the Unit 1/Unit 2 Tie-In Outage, as well as, those impacting the Unit 2 Fuel Load Schedule.
- b) Because a large number of NCRs that have not been satisfactorily dispositioned within 30 days are associated with receiving inspection activities, PP&L is reevaluating its NCR procedures relating to receipt inspection. PP&L's purchasing contracts state that PP&L does not accept a product until after it has been processed through receipt inspection. Therefore, items subject to receipt inspection do not enter the PP&L quality system until after they have been accepted or conditionally released via the NCR procedure NDI-QA-8.1.5. An alternate document to the NCR is under investigation to control such items. This new approach to receipt inspection will recognize and allow the time required for protracted resolutions to commercial issues without encumbering the quality program with unessential status keeping measures.
- c) The additional 157 examples cited by the inspector will be dispositioned or statused under the above programs.

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

As a result of the corrective actions specified above, PP&L anticipates full compliance by April 30, 1984.