



Pennsylvania Power & Light Company

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Bruce D. Kenyon
Vice President-Nuclear Operations
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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 REPORT 50-387/83-30
AND 50-388/83-25
ER 100450
PLA-2086

FILE 841-04

Docket Nos. 50-387
50-388

Dear Mr. Martin:

This letter provides PP&L's response to your letter of January 26, 1984, which forwarded NRC Region I Combined Inspection Reports 50-387/83-30 and 50-388/83-25 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. However, as discussed with Mr. Gene Kelley and Mr. Don Capton of NRC Region I on February 23, 1984, PP&L has been authorized to delay its response to Violation A until March 26, 1984. We trust that the Commission will find the attached response to violations B and C acceptable.

Very truly yours,

B. D. Kenyon
Vice President-Nuclear Operations

Attachments

cc: Mr. R. H. Jacobs - NRC Resident Inspector
NMr. D. Capton - NRC Region I

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RESPONSES TO NOTICE OF VIOLATION

Violation B: (387/83-30-13 and 388/83-25-13)

10 CFR Part 50 Appendix B Criterion II and ANSI N 18.7 - 1976 (endorsed by the licensee's Final Safety Analysis Report) in part requires ... "control over activities affecting the quality of identified structures, systems and components to an extent consistent with their importance to safety." The licensee's procedure for controlling setpoint change is AD-QA-402, Setpoint Change Control, Revision 3.

Contrary to the above, as of December 2, 1983 temporary setpoint change activities affecting quality were not controlled and the licensee's procedure AD-QA-402 Revision 3 for controlling the set point changes did not procedurally prohibit use of expired temporary set point changes as exhibited by the following examples: temporary set point changes 82-028T, 82-029T and 83-238T had expired but were still in effect.

Response:

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

- a) The identified deficiencies were corrected. Temporary setpoint changes 82-028T and 82-029T were made into permanent setpoint changes. Temporary setpoint change 83-238T was removed and returned to normal.
- b) The setpoint change log was reviewed and four additional temporary setpoint changes were found to have expired. The temporary setpoints were extended as new temporary setpoint changes.
- c) As an interim measure, procedure AD-QA-402 (Setpoint Change Control) has been changed to require a weekly review of the setpoint change log to identify temporary setpoint changes that will expire within the following week. Findings from this review will be given to the Technical Supervisor for action to prevent the existence of expired temporary setpoint changes.

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

Procedure AD-QA-402 will be revised to including the following:

- 1) The setpoint change log will be reviewed weekly and current status of setpoint changes will be periodically submitted to PORC, Plant Staff Section Heads and Nuclear Plant Engineering.
- 2) Section Heads will be responsible for ensuring that temporary setpoint changes initiated by personnel under their cognizance are removed prior to the expiration date.
- 3) The duration of temporary setpoint changes will be limited to sixty days. Temporary setpoints may be extended only by approval of a new temporary setpoint change.

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

As a result of the corrective actions in (1) above, PP&L is now in full compliance.

Violation C: (387/83-30-21 and 388/83-25-21)

10 CFR Part 50 Appendix B Criterion XVIII states in part: "A comprehensive system of planned and periodic audits shall be carried out to verify compliance with all aspects of the quality assurance program and to determine the effectiveness of the program...". The licensee's procedure, NDI-QA-8.1.1, Performance of Quality Assurance Audits and Surveillance Activities, Revision 1, implements the above requirement.

Contrary to the above as of December 2, 1983 the licensee's QA Audits did not verify compliance with all aspects of the quality assurance program and did not determine the effectiveness of the program. Audit No. 0-82-05 for Conduct of Operation and Audit No. 0-82-40 for Technical Specifications were examples of the above.

Response:

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

PP&L has initiated a reassessment of its audit methodology and philosophy in order to identify where improvement is needed to assure coverage of all Quality Program aspects. Until such time as this reassessment has been completed, PP&L will review the scopes of the audits being performed to meet the 1984 Audit Schedule to ensure that all applicable Quality Program aspects are being assessed during the audit process. One such audit being conducted by the Nuclear Quality Assurance (NQA)-Operations staff is #0-84-06 entitled "Conduct of Operations." This audit is being scoped to provide increased coverage of real time activities in order to better assess the effectiveness of the performance of the operating staff.

Additionally, NQA Surveillances have been increased in their depth of coverage to provide an added level of program overview. The results of surveillances are being factored into the next scheduled audit of the areas examined during the respective surveillances in order to improve the overall effectiveness of NQA's assessments.

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

As a part of its reassessment of audit philosophy, PP&L has under development a matrix which will identify by audit title the following elements of a specific audit activity: Quality Program aspects, plant programs, and organizations having program implementation responsibilities. This matrix will be utilized as a management system to ensure that all relevant Quality Program aspects, plant programs and implementing organizations are assessed during the performance of the specific audit(s).

In order to furnish more meaningful assessments of program effectiveness, PP&L is developing a methodology for incorporating the results of NQA surveillances into the audit program. This should provide better visibility of the impact which NQA "real-time" surveillance activities have in the overall audit program.

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

As a result of the corrective actions described above, PP&L expects to achieve full compliance by May 31, 1984.