



Pennsylvania Power & Light Company

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

MAR 09 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 50-387/83-27
AND 50-388/83-26
ER 100450
PLA-2112

FILE 841-04

Docket Nos. 50-387
50-388

Dear Mr. Martin:

This letter provides PP&L's response to your letter of February 8, 1984, which forwarded NRC Region I Combined Inspection Reports 50-387/83-27 and 50-388/83-26 with Appendix A, Notice of Violation.

Your Notice advised that PP&L was to submit a written reply to the violation within thirty (30) days of the date of the letter. Your letter also requested that PP&L address the issues discussed in Detail 7 of the inspection report. PP&L's response is attached. 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 Resident Inspector
Dr. J. C. Jang - NRC Region I

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Q PDR

RESPONSE TO NOTICE OF VIOLATION

Violation: (387/83-27-01)

Section 6.8.1 of the Technical Specifications requires written procedure shall be established, implemented and maintained covering the various activities.

Contrary to the above, the procedures (SC-69-006 and CH-IC-011) used for the liquid radwaste monitor calibration were not implemented as required.

Response:

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

Following discovery of the problem, an investigation was made, and it was found that the monitor was capable of counting Co-57 at 122 Kev. The monitor was calibrated and counting efficiencies were obtained for Cd-109 (88 Kev), Co-60 (1173 & 1332 Kev) and Cs-137 (661 Kev). It was also determined that no adverse consequences would have resulted from discharging with the monitor discriminator set above 88 Kev but, below 122 Kev for the following reasons:

- a. All liquid radwaste discharges are counted prior to release and contain predominately Cr-51 (320 Kev), Mn-54 (835 Kev), Co-58 (810 Kev) and Na-24 (1368 and 2754 Kev).
- b. The monitor setpoint is based on the Cs-137 efficiency.

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

Minimum requirements for a satisfactory calibration of the monitor have been established and added as Acceptance Criteria to the surveillance procedure, SC-069-006. These requirements consist of verifying monitor response at different energies by obtaining efficiencies for Cd-109, Co-60 and Cs-137 and a verification of the resolving time of the monitor.

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

Based on the actions stated above, PP&L is now in full compliance.

• COMMENTS ON "ANALYTICAL PROCEDURES AND IMPLEMENTATIONS" (DETAIL #7)
TC INSPECTION REPORT 387/83-27; 388/83-26

1. "No equation for the concentration calculation", re: CH-CC-011 Rev. 1.

A procedure change has been implemented to incorporate the equation for making dilution corrections to obtain actual chloride concentration.

2. "No references for other procedures (CH-IC-001 and SC-76-106) which contained limits and actions", re: CH-CC-011 Rev. 1; and "Lack of proper referencing", re: CH-CC-017.

Implementing procedures, such as CH-CC-011 (Chloride Spectrophometric) and CH-CC-017 (Conductivity) do not reference other procedures such as surveillances or actual limits because of the manner in which these procedures are used by the Chemistry Technicians. Normally these procedures are not intended to be used independent of a controlling procedure where the implementing procedure must be referenced. For Technical Specification required analyses, a Surveillance Procedure tells the Technician which implementing procedures are to be used to do the analysis, what the limits are, and what actions are required if the limits are exceeded. For analyses not required by Technical Specifications, CH-CI-001 lists the sample point, the routine analyses and frequencies, the procedure(s) to be used and applicable limits.

The above method is preferred over listing in the analytical procedure all the limits associated with that analysis or referencing other procedures. For example, there are five analytical procedures for performing a chloride analysis. If the limits for all samples requiring chloride analysis were listed in each procedure, there would be much redundancy. The Surveillance Procedure for chlorides in reactor coolant would still be necessary per Plant Administrative Procedures. The list of sample points and limits needed for the conductivity procedure would be even greater.

It is preferred to maintain our current philosophy.

3. "Plotting the calibration curve on the semi-log graph paper (CH-CC-036)", re: CH-CC-011 Rev. 1.

A Procedure change has been implemented to specify use of linear graph paper in plotting calibration curve.

4. "Deviations relating to proper... use of equations", re: CH-CC-017.

A procedure change has been implemented to add a method for making temperature corrections for conductivity measurements.