



Pennsylvania Power & Light Company

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MAR 30 1984

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

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 50-388/83-19  
NOTICE OF VIOLATION  
ER 100508 FILE 841-04  
PLA-2146

Docket No. 50-388

Dear Mr. Martin:

This letter provides PP&L's response to your letter of February 28, 1984, which forwarded NRC Region I Inspection Report No. 50-388/83-19 and "Appendix A, Notice of Violation."

Your notice advised that PP&L was to submit a written reply within (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

Attachment

cc: Mr. R. H. Jacobs - NRC Resident Inspector  
Mr. L. H. Bettenhausen - NRC Region I

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## RESPONSE TO NOTICE OF VIOLATION

### A. Violation: (388/83-19-03)

10 CFR 50, Appendix B, Criterion IX requires that special processes such as welding and nondestructive testing be accomplished by qualified personnel using qualified procedures in accordance with applicable codes, specifications, criteria and other special requirements. Bechtel Specification 8856-M-204, Revision 12, Paragraph 7.5 requires that welds identified by Inservice Inspection Isometric Drawings be prepared for inservice inspection. Inservice Inspection Isometric Drawing No. ISI-DCA-210-2 identifies weld DCA-210-2-FW2 for such preparation. Further, Nuclear Energy Services, Inc., Document No. 80A4745, PSI Program Plan - RHR System requires that weld DCA-210-2-FW2 be preservice inspected using ultrasonic examination methods. Bechtel Field Inspection Report, file number M204-19968, dated May 11, 1983, states that weld DCA-210-2-FW2 was satisfactorily prepared for preservice inspection/inservice inspection in accordance with Bechtel Specification M204, Revision 12.

Contrary to the above, during this inspection, it was found that on June 14, 1983, the complete ultrasonic preservice inspection of weld DCA-210-2-FW2 was precluded by weld edge contours which were inadequately prepared for ultrasonic examination. The inadequate preparation was verified visually by NRC inspectors.

#### Response:

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

Revised relief request #9 to the Unit #2 Preservice Inspection (dated December 21, 1983) addressed weld DCA-210-2-FW2, and identified that a percentage of the ultrasonic preservice inspection of the weld was not performed.

The resolution of PP&L relief request for weld DCA-210-2-FW-2 was satisfactorily addressed in Supplement 6 to the SER issued March, 1984.

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

The Unit 2 preservice inspection program and its associated review is completed. Therefore, no additional weld problems should be identified for welds within the scope of the preservice inspection program.

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

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

### B. Violation: (388/83-19-09)

10 CFR 50, Appendix B, Criterion III, states, in part, that: "Measures shall be established to assure that... design basis ... for those structures, systems and components... are correctly translated into specifications, drawings, procedures and instructions."

FSAR section 0.3.3.1 of Appendix D, states, in part, "the project engineering team employs several documents to establish requirements.... These documents include... project criteria... standard specifications and data sheets."

Contrary to the above, on October 20, 1983, the inspector observed that small bore pipe installation per drawing nos. SP-DCB-212-5 and SP-DCB-212-6 was not in accordance with the flex-leg design basis established in the engineering analysis, specifically calculation no. E-2335-F.

Response:

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

A reanalysis was performed to confirm code compliance with the as-installed condition, considering the differential movements between the two buildings. As a result of the reanalysis:

1. Hanger DCB-212-H5059 (anchor) was modified to a one way restraint and installed in the field. With this change the piping system conforms to ASME Section III, and
2. Hanger DCB-212-H-5029 (hanger number DCB-212-H-5024 identified in the NRC Report is believed to be a typo) did not create a piping overstress problem and as such no modification was found necessary.

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

All similar SLC small bore pipes were evaluated under the Bechtel reconciliation program and a reanalysis was performed where required to demonstrate system acceptability.

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

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

C. Violation: (388/83-19-05)

10 CFR 50, Appendix B, Criterion V states, in part, "Activities affecting quality shall be prescribed by documented instructions..., and shall be accomplished in accordance with these instructions, procedures or drawings...."

Paragraph 6.1.f of Field Procedure No. J-2, revision 7, dated April 4, 1983, states, in part, "...nameplate data shows the correct information per engineering and vendor drawing or specification."

Contrary to the above, on October 25, 1983, the inspector observed that the Cleanup Leak Detection System dual element temperature unit nos.

TE-G33-2N016 A through F, TE-G33-2N022 A through F and TE-G33-2N023 A through F were identified incorrectly on nameplates as single element units.

Response:

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

Work was performed and completed to install the proper (dual element) metal nameplates on the Cleanup Leak Detection System dual element temperature units, nos. TE-G33-2N016A through F, TE-G33-2N022A through F and TE-G33-2N023A through F.

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

No other actions are necessary to avoid further violations.

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

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