



# Pennsylvania Power & Light Company

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

OCT 12 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 50-387/84-27  
ER 100450 FILE 841-04  
PLA-2329

Docket No. 50-387

Dear Mr. Martin:

This letter provides PP&L's response to your letter of September 13, 1984, which forwarded NRC Region I Inspection Report 50-387/84-27 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,

B. D. Kenyon  
Vice President-Nuclear Operations

Attachments

cc: Mr. R. H. Jacobs - NRC Senior Resident Inspector  
Mr. E. Woltner - NRC Region I

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## RESPONSE TO VIOLATION

Violation: (387/84-27-01)

10 CFR 50.54(q) requires that nuclear power reactors have and follow plans that meet the standards in 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR 50. 10 CFR 50.47(b)(15) requires that radiological emergency response training is provided to those who may be called on to assist in an emergency. 10 CFR 50, Appendix E, Section IV.F requires specialized initial training and periodic retraining programs be provided to emergency personnel.

Section 8.1.1(3), of the Emergency Plan, states in part, Personnel assigned to the Pennsylvania Power & Light emergency organization with specific Emergency Plan duties and responsibilities shall receive specialized training. Table 8.1, Training of SES Emergency Response Personnel and training procedure NTP-QA-52.1, "Emergency Plan Training Matrix," specifies that individuals designated as members of the Emergency Support Staff shall complete all annual required program training.

Contrary to the above, two primary contact members of the current TSC/EOF On-Call List of five positions verified had not been provided the annual required training.

Response:

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

Training on the required courses was completed for the individuals noted on August 3, 1984.

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

The cause of this violation is that a notification system does not exist to make people aware of retraining courses which must be taken prior to specified expiration dates. A course expiration notification system is being developed and will become effective January 1, 1985. The computerized system will notify individuals at intervals of 90, 60, and 30 days prior to the expiration date of the course, that retraining is required. This will allow enough time for the course to be scheduled.

As part of the above system implementation a review will be made of current records to determine if other training has expired.

A review will be made of Nuclear Department Instruction 6.6.2 (Selection, Training and Certification of Emergency Response Personnel) to determine if a procedural change is warranted to ensure appropriate actions are taken if required retraining is not completed in a timely manner. This will include evaluation of a process to remove persons with expired training from the emergency response organization. Procedural changes identified will be completed by March 1, 1985.

- (3) Date of Full Compliance

Additional retraining identified will be completed by March 31, 1985.