July 16, 1998

EA 98-350

Mr. Robert G. Byram
Senior Vice President-Nuclear
Pennsylvania Power & Light Company
2 North Ninth Street
Allentown, Pennsylvania 18101

SUBJECT: SUSQUEHANNA STEAM ELECTRIC PLANT MAINTENANCE RULE BASELINE TEAM INSPECTION REPORT 50-387/98-04 & 50-388/98-04

Dear Mr. Byram:

This report transmits the findings of the safety inspection conducted by NRC inspectors at the Susquehanna Steam Electric Plant during the week of June 8, 1998. The purpose of this inspection was to review your implementation of the maintenance rule in accordance with 10 CFR 50.65. At the conclusion of this inspection, these findings were discussed with members of your staff.

Overall, we concluded that your facility had implemented the maintenance rule acceptably at the time of the inspection with the exception of the violation identified below. We are concerned, however, that before June 1998 significant performance weaknesses and inadequacies existed that indicated an apparent organizational ineffectiveness in initial implementation of the maintenance rule. We noted that a number of revisions and substantial improvements to your program were implemented just prior to this inspection.

Based on the results of this inspection, the NRC has determined that apparent violations of NRC requirements occurred. The violations were mostly self identified, but NRC identified a scoping violation. The self identified apparent violations included: 1) failure to include all required systems within the maintenance rule program, 2) failure to take into account all operating modes when evaluating risk significance, 3) failure to establish effective performance criteria, 4) failure to make timely performance reviews and properly classify functional failures, 5) failure to perform an adequate periodic assessment, and 6) failure to take timely actions to place systems in (a)(1) and make appropriate corrections.

We are continuing to review the violations as related to the past problem with maintenance rule implementation. We will contact you shortly on our enforcement action. In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room (PDR).

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Q PDR

Your cooperation with us is appreciated.

Sincerely,
ORIGINAL SIGNED BY:

James T. Wiggins, Director
Division of Reactor Safety

Docket Nos.: 50-387 & 50-388
License Nos.: NPF-14 & NPF-22

Enclosure: Inspection Report 50-387/98-04 & 50-388/98-04

cc w/encl:
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G. T. Jones, Vice President - Engineering and Support
G. Kuczynski, General Manager - SSES
J. M. Kenny, Supervisor, Nuclear Licensing
G. D. Miller, General Manager - Nuclear Engineering
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F. P. Arcury, Nuclear Services Manager, General Electric
C. D. Lopes, Manager - Nuclear Security
A. Male, Manager, Nuclear Assessment Services
H. D. Woodeshick, Special Assistant to the President
J. C. Tilton, III, Allegheny Electric Cooperative, Inc.
R. A. Calvan, Regional Director, FEMA, Region III (EP Exercise/IRs **Only**)
Commonwealth of Pennsylvania

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C. ANDERSON 7/16/98

LIST OF ACRONYMS USED

ADS	Automatic Depressurization System
AOT	Allowed Outage Time
ATWS	Anticipated Transient Without Scram
BDID	Back Draft Isolation Damper
CDF	Core Damage Frequency
CM	Corrective Maintenance
CR	Condition Report
CRD	Control Rod Drive
CREOASS	Control Room Emergency Outside Air Supply System
CS	Core Spray
EA	Enforcement Action
EDG	Emergency Diesel Generator
EOPs	Emergency Operating Procedures
EPRI	Electric Power Research Institute
ESW	Emergency Service Water
FF	Functional Failure
FSAR	Final Safety Analysis Report
FW	Feedwater
GDG	General Design Guideline
HCU	Hydraulic Control Unit
HPCI	High Pressure Coolant Injection
HVAC	Heating, Ventilation, and Air-Conditioning
IFI	Inspector Follow Item
IOE	Industry Operating Experience
IPE	Individual Plant Examination
KV	Kilovolt
LCO	Limiting Condition of Operation
LLRT	Local Leak Rate Test
MOV	Motor Operated Valve
MPFF	Maintenance Performance Functional Failure
MRC	Maintenance Rule Coordinator
MRFF	Maintenance Rule Functional Failure
MSIV	Main Steam Isolation Valve
NUMARC	Nuclear Utility Management and Resource Council
PM	Preventative Maintenance
PORC	Plant Operations Review Committee
PRA	Probabilistic Risk Assessment
PSIG	Pounds Per Square Inch Gage
QA	Quality Assurance
RAW	Risk Achievement Worth
RCIC	Reactor Core Isolation Cooling
RCS	Reactor Coolant System
RHR	Residual Heat Removal System
RHRSW	Residual Heat Removal Service Water
RMCS	Reactor Manual Control System
RPS	Reactor Protection System
RRW	Risk Reduction Worth
SBO	Station Blackout

SLCS	Standby Liquid Control System
SP	Support Procedure
SRV	Safety Relief Valve
SSCs	Structures, Systems and Components
SSES	Susquehanna Steam Electric Station
UCLF	Unplanned Capacity Loss Factor
UFSAR	Updated Final Safety Analysis Report
VAC	Volts Alternating Current
V DC	Volts Direct Current
WA	Work Authorization

LIST OF ITEMS OPENED AND/OR CLOSED

OPENED

EEI 50-378/388/98-04-01 Failure to place a safety related system within the maintenance rule program.

EEI 50-378/388/98-04-02 Failure to place systems in (a)(1) status in a timely manner.

EEI 50-387/388/98-04-03 Failure to perform an adequate periodic assessment.

EEI 50-387/388/98-04-04 Failure to implement an effective maintenance rule program.

IFI 50-387/388/98-04-05 *Administrative controls of EOP and support procedures.*

CLOSED

URI 50-387/388/97-03-04 Back draft isolation dampers tested and included in the maintenance rule program.

PARTIAL LIST OF PERSONS CONTACTED

Pennsylvania Power & Light Company
Kevin Chambliss, Manager, Nuclear Operations
Tom Fedorko, Operations Unit Supervisor
Steve Geiger, Maintenance Rule Coordinator
Cas Kukielka, PRA Engineer
George Kuczynski, General Manager SSES
Jerry Radishofski, Operations Supervisor
Wilbur Slusser, Work Week Manager
Jeff Sukal, Project Manager, Work Coordination
Dave Walsh, Operations Shift Supervisor
Bill Williams, Senior Licensing Engineer
Robert Breslin, Manager, Nuclear Maintenance
Dale Roth, Operations Engineering Supervisor
G. Miller, General Manager, Nuclear Engineering
Richard Pagodin, Manager, Nuclear Systems Engineering
Mike Gorski, PP&L Inspection Team Lead
Vince Kelly, Supervising Engineer
Robert Prego, Supervisor, Surveillance Services

LIST OF INSPECTION PROCEDURES

IP 62706 Maintenance Rule