



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
REGION I  
475 ALLENDALE ROAD  
KING OF PRUSSIA, PA 19406-1415

February 2, 2009

Mr. William H. Spence  
Executive Vice-President  
Chief Operating Officer/Chief Nuclear Officer  
PPL Corporation  
Two North Ninth St., GENTW16  
Allentown, PA 18101-1179

RI-2008-A-0007

Subject: NRC Office of Investigations Case No. 1-2008-032

Dear Mr. Spence:

The Region I Field Office, NRC Office of Investigations (OI) initiated an investigation (Case No. 1-2008-032) on March 7, 2008, to determine whether Susquehanna management willfully directed workers to perform work in violation of a technical specification-required fuel verification procedure. Based upon testimony and documentary evidence, the NRC did not substantiate that managers willfully directed workers to perform work in violation of the procedure.

In early January 2008, fuel channels were moved in accordance with fuel verification procedure ME-ORF-161, "Control of Fuel Pool Cleanout Activities," but without concurrent verification of fuel channels by reading serial numbers as required by Step 9.3.2. Questions and confusion developed among workers regarding whether or not the fuel channel serial numbers needed to be read concurrently with the present moves, or whether the previously-performed full inventory satisfied the concurrent verification requirement. It was also unclear whether the camera used to read the serial numbers was operational, and miscommunication of a possible procedural violation also occurred.

Based on the evidence gathered during the investigation, the NRC determined that a violation of Step 9.3.2 in procedure ME-ORF-161 occurred. Specifically, the requirement for visual concurrent verification of the fuel channel serial numbers was not performed. However, the NRC did not conclude that the procedure violation was suggestive of wrongdoing. Rather, the NRC concluded that there was a lot of confusion and miscommunication regarding the status of the camera's operability, the relation of the previously-performed full inventory compared to future fuel channel verification, the understanding of the new procedure, the circumstances surrounding whether a procedure violation had occurred, and if so, who was writing a condition report.

The safety significance of the violation was evaluated by the NRC and was found to be minor. The violation was minor because no fuel was placed in the wrong location, it did not contribute to the likelihood of a fuel handling accident, and there were no actual safety consequences. Minor violations represent items of very low safety significance and are not subject to formal enforcement action or documentation by the NRC. Therefore, this minor violation will not be documented in an inspection report, and no further regulatory action is planned.

Please note that final NRC investigation documents, such as the OI report described above, may be made available to the public under the Freedom of Information Act (FOIA) subject to redaction of information appropriate under the FOIA. Requests under the FOIA should be made in accordance with 10 CFR 9.23, Requests for Records, a copy of which is enclosed for your information.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

No response to this letter is required. Should you have any questions regarding this letter, please contact Mr. P. Krohn of my staff at (610) 337-5120.

Sincerely,

/RA/

David C. Lew, Director  
Division of Reactor Projects

cc w/encl:

C. Gannon, Vice President, Nuclear Operations  
R. Paley, General Manager, Plant Support  
R. Pagodin, General Manager, Nuclear Engineering  
M. Crowthers, Manager, Nuclear Regulatory Affairs  
R. Smith, General Manager, Site Preparedness and Services  
D. Brophy, Supervisor, Nuclear Regulatory Affairs  
J. Helsel, Manager, Training  
D. McGann, Manager, Quality Assurance  
J. Scopelliti, Community Relations Manager  
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Supervisor, Document Control Services, PPL Susquehanna, LLC  
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E. Epstein, TMI-Alert (TMIA)  
J. Powers, Dir, PA Office of Homeland Security  
R. French, Dir, PA Emergency Management Agency

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Sincerely,  
/RA/  
David C. Lew, Director  
Division of Reactor Projects

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