

PP&L

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October 23, 1979

Mr. Robert T. Carlson
Chief FS & ES Branch
U. S. Nuclear Regulatory Commission
631 Park Avenue
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SUSQUEHANNA STEAM ELECTRIC STATION
NRC INSPECTION OF JUNE 18-29 & JULY 9-27, 1979
REPORT NOS. 387/79-21 & 388/79-12
ERS 100450/100508 FILE 840-4
PLA-415

Dear Mr. Carlson:

Reference is to your letter of September 13, 1979 which forwarded IE Inspection Reports No. 50-387/79-21 and 388-79-12 and Enclosure (1) thereto, "Appendix A, Notice of Violation".

Your letter advised that PP&L was to submit, within thirty (30) days of receipt, a written explanation addressing (1) corrective steps which have been taken and the results achieved, (2) corrective steps which have been taken to avoid further items of noncompliance, and (3) the date when full compliance will be achieved.

The Notice of Violation (Infraction) states as follows and the corrective measures are detailed below:

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

The Susquehanna PSAR Section D.2.5 states, in part: "Activities affecting quality will be prescribed by documented instructions, procedures or drawings appropriate to the circumstances."

Bechtel Field Procedure FP-G-4, Revision 11 Section 3.3.3 states, in part, "Individuals requiring additional drawings/documents for construction or inspection may be issued prints identified as "Production Prints" in approximately half-inch high letters."

Contrary to the above, as of July 12, 1979, vendor drawings used for construction of the Refueling Platform were not identified as "Production Prints".

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

- (a) The vendor drawings in question have been processed through the normal Bechtel system and have been issued as controlled drawings. Specifically, the drawings have been reviewed and stamped by Project Engineering, assigned vendor print numbers, and processed and controlled in accordance with Field Procedure, G-4.
- (b) NCR 4063 was issued on 6/20/79 to document the condition. Bechtel Field Engineering compared the drawings which had been used for construction with those that had been reviewed and approved for use by Bechtel Project Engineering. The investigation revealed that both sets were identical.
- (c) NCR 4063 was closed on 10/5/79 based upon the acceptability of the drawings actually used for construction and the availability of controlled drawings that had been approved by Bechtel Project Engineering.

The above actions have provided assurance that the use of uncontrolled drawings has had no adverse effect on installation of the equipment; and, that the use of uncontrolled drawings has been halted.

(2) Corrective steps which have been taken to avoid further items of noncompliance:

- (a) A memo was issued by the field construction manager to all field engineers and superintendents emphasizing the requirements for use of controlled drawings for all permanent plant installation work.
- (b) Resident engineers have been cautioned that authorization for use of drawings must include revision levels and drawing control requirements specified in FP-G-4.

(3) Date when full compliance will be achieved:

Full compliance achieved October 5, 1979.

We trust the Commission will find these measures acceptable.

Very truly yours,



A. R. Sabol
Manager-Nuclear Quality Assurance

ARS:mcb

cc: Mr. Robert M. Gallo
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