

TWO NORTH NINTH STREET, ALLENTOWN, PA. 18101 PHONE: (215) 821-5151

November 2. 1979

Mr. Boyce H. Grier Director, Region I U. S. Nuclear Regulatory Commission 631 Park Avenue King of Prussia, PA 19406

SUSQUEHANNA STEAM ELECTRIC STATION
INSPECTION NOS. 50-387/79-25; 50-388/79-13
ER 100450 FILE 840-4
PLA - 419

Dear Mr. Grier:

The following is Pennsylvania Power & Light Company's response to I&E Inspection Nos. 50-387/79-25 and 50-388/79-13:

Item 1 - "Based on the results of a NRC inspection conducted on August 6,7 and 8, 1979, it appears that one of your activities was not conducted in full compliance with NRC regulations and the conditions of your NRC Construction Permits CPPR-101 and CPPR-102, as indicated below. This item is categorized as a Deficiency.

Section 3.D.3 of the Construction Permits CPPR-101 and CPPR-102 requires, in part, that a comprehensive preoperational environmental program be implemented to determine environmental effects that may occur as a result of site preparation and construction. The procedure, "Instruction for control of Pollution Associated with Construction Phase", which is part of the required environmental program, requires in part that weekly inspections be made of dust control, and that significant events, which may create detrimental ecological conditions be documented in a Corrective Action Report (CAR) and reported to PP&L management.

Contrary to this requirement, an unacceptable dusting condition identified during the weekly inspection performed on October 23, 1978 was not reported to appropriate PP&L management as required".

Response: Regarding the above item, the inspection for dusting control and the required inspection report were completed as required by the procedure. The appropriate corrective action required after the inspection was also completed. However, the individual responsible did not complete the required corrective action report (CAR) documenting the action taken, for management review.

The individual responsible for administration of this procedure has been admonished to complete all required records. A review of this procedure indicated that there is no required time period for completion of these records. The procedure is being revised to require a quarterly review of all inspection reports, corrective action taken and corrective action reports being completed. This procedure will be revised by December 15, 1979 and full compliance will be achieved as of that date.

Item2 - "During the site observations on August 6,7 and 8, 1979, the inspector noted run off water with excessive turbidity and cement material discharged from the batch plant. The water was discharged in an uncontrolled fashion resulting in erosion/sedimentation problems at the C-1 access road and at the wooded area east of the C-1 basin. The inspector stated that failure to control erosion/sedimentation was in deviation from commitments made in Section 4.1 of the Environmental Report and from acceptable industry practice, which provide for the use of settling basins to control the turbidity of all construction water and for the maintenance of these basins to achieve this purpose (387/79-25-02; 388/79-13-02).

Response: The apparent uncontrolled release was from the batch plant wash down area. Water was permitted to reach the road and run along it. Corrective action included regrading of the batch plant wash down area and rerouting of any effluents to a controlled pathway which is then treated and monitored as effluent from the C-1 pond. Construction was completed on September 15, 1979. Full compliance was achieved on this date.

Very truly yours,

N. W. Curtis

Vice President - Engineering and Construction

NWC:bjh

