

**PP&L**

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January 29, 1980

Mr. Robert T. Carlson  
Chief RC & ES Branch  
U. S. Nuclear Regulatory Commission  
631 Park Avenue  
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SUSQUEHANNA STEAM ELECTRIC STATION  
NRC INSPECTION OF OCTOBER 22-25, 1979  
REPORT NO. 50-387/79-35  
ER's 100450/100508      FILE 840-4  
PLA-444

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Dear Mr. Carlson:

Reference is to your letter of December 28, 1979 which forwarded IE Inspection Report No. 50-387/79-35 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 VIII, states, in part, that: "Measures shall be established for the identification and control of materials, parts, and components... These measures shall assure that identification of the item is maintained... throughout fabrication, erection, installation, and use of the item."

Section D.2.8 of Appendix D of the PSAR states, in part, that: "Appropriate requirements will be established to assure identification and control of materials, parts, and components..."

Bechtel Quality Control Instruction (QCI) El.0 states the requirement in Paragraph 3.12 that, as part of the final inspection of raceway, raceway identification be verified correct. Bechtel Quality Control Inspection Report (QCIR) for conduit ELF-034 was signed off by QC as having been verified correct.

Contrary to the above, as of October 24, 1979, conduit ELF-034 was erroneously identified as conduit ELF-035."

1. Corrective steps which have been taken and results achieved:

It has been determined that the conduit was correctly identified at the time (1-23-78) it was inspected by Quality Control; however, the pre-printed marker used to identify the raceway subsequently became frayed and damaged. During cable pulling operations, the condition of the raceway marker was noted and it was requested by Field Engineering that Construction remark the conduit. This was accomplished by paint stencil (an approved alternate for raceway marking); however, the procedural requirement for initiating a MCFRR (Material Control Field Raceway Report) was not satisfied by Field Engineering. Therefore, Quality Control was not aware that the conduit was remarked.

MCFRR QIC-416 was issued on 10-26-79 by Field Engineering in accordance with Field Procedure E-2 to instruct the Field to re-identify ELF-034 correctly. The identification of conduit ELF-034 is now correct; MCFRR QIC-416 has been signed off by Field Engineering and Quality Control, and the reinspection of this item has been documented by Quality Control on QCIR ELF-034A. An inspection of twenty additional conduits selected at random throughout the building was conducted but did not disclose any similar discrepancies. Based upon the random sample, it is concluded that the discrepancy noted by this is an isolated occurrence and; therefore, requires no further corrective action. All of the above remedial actions were completed by 12-31-79.

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

To avoid similar items of noncompliance, the use of Material Control Field Raceway Reports (MCFRRs) per Field Procedure E-2 will be discussed at the January 1980 electrical training session for responsible Field Engineers.

3. Date when full compliance will be achieved:

All measures necessary to achieve full compliance will be accomplished by 1/30/80.

We trust the Commission will find these measures acceptable.

Very truly yours,



A. R. Sabol  
Manager - Nuclear Quality Assurance

ARS/pae

cc: Mr. Robert M. Gallo  
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