

PP&L

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February 27, 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 29-NOVEMBER 2, 1979
REPORT NOS. 50-387/79-36 and 50-388/79-19
ERS 100450/100508 FILE 840-4
PLA-453

Dear Mr. Carlson:

Reference is to your letter of January 23, 1980 which forwarded IE Inspection Report Nos. 50-387/79-36 and 50-388/79-19 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:

- A. 10 CFR50, Appendix B, Criterion V, states in part, "Activities affecting quality shall be prescribed by documented instructions, procedures... and shall be accomplished in accordance with these instructions, procedures or drawings...."

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

PSAR, Section D.3.3.7 states in part, "...use of qualified procedures and application thereof as required by established standards will be rigidly enforced."

Paragraph 4.4.3 of Bechtel Field Instruction Manual, G-3, states in part, "...when more than two items are involved, each item...shall be tagged...."

Contrary to the above, on 10-30/79, a nonconforming hold tag, NCR-4474 was attached to the Reactor Building indicating that the quality of all supports in the building utilizing P1950/PS3143 flat gusset fittings as base plates to be indeterminate and therefore nonconforming. Rather than

tag the individual supports as required by Paragraph 4.4 of Field Instruction Manual, G-3, Revision 6, one hold tag was attached to each building containing the supports in question.

1. Corrective Steps Which Have Been Taken and Results Achieved:

Bechtel Field Inspection Manual Procedure G-3, Revision 6, has been amended by SF/PSP G-3.7, Revision 0, to provide for the following:

When an NCR is applicable to more than one item in a common area; i.e., a room, area and elevation, and it is not practical to tag each individual item, one hold tag may be placed in a conspicuous location in the approximate vicinity of the nonconforming item within the area. In addition to the Hold Tag, a method of identifying each nonconforming item associated with the Hold Tag must be provided. Acceptable methods would be to:

- (1) Attach a list of the specific nonconforming items to the Hold tag; or
- (2) Uniquely code each nonconforming item and describe the method of coding on the Hold Tag.

Hold Tags for NCR 4474 have been placed in each room, area and elevation to identify one of the type supports that use the P1950/PS3143 flat gusset fittings as a base plate. Similar installations in the Diesel Generator Building and Engineering Safeguard Service Water Pumphouse have been evaluated and found acceptable; therefore, the NCR Hold Tags have been removed in these buildings.

2. Corrective Steps Which Have Been Taken To Avoid Further Items of Noncompliance:

All areas denoted on the NCR as containing the nonconforming flat gusset fittings were investigated and NCR Hold Tags were placed as necessary.

A Quality Control training session on FIM G-3, Paragraph 4.4 (Placement of Hold Tags) was presented to Quality Control personnel on 12/18/79. An additional training session was held on 2/13/80 to cover the requirements of PSP G-3.7, Revision 0.

3. Date When Full Compliance Will Be Achieved:

PSP G-3.7, Revision 0 was approved by PP&L on 2/12/80 and will be issued for Project use by 2/29/80.

Hold Tags for NCR 4474 will list each nonconforming flat gusset fitting by 2/29/80.

- B. 10 CFR 50, Appendix B, Criterion III states in part, "...measures shall include provisions to assure that appropriate quality standards are specified and included in design documents and that deviations from such standards are controlled."

PSAR, Section D.2.5, states in part, "Activities affecting quality will be prescribed by documented instructions and procedures...."

Licensee response to NRR SAR Review Question D.18 states in part, "...all design documents issued by Project Engineering team are subject to the review process on an item by item basis...these reviews are completed prior to...start of construction on the item."

Contrary to the above, seismic supports for Class 1E raceways have been installed in concrete block walls utilizing Detail 15 of Drawing C-805, Sheet 2, which was inadequate, in that the drawing did not specify required bolt spacing and minimum required distance from the thru bolts to edge of block wall to assure seismic adequacy of the installation.

1. Corrective Steps Which Have Been Taken and Results Achieved:

As a result of Field Engineering Surveillance, DCN No. 1 to Sheet 2, Revision 10, of Drawing C-805, was initiated on 10/18/79 to provide necessary instructions for the installation of through bolts and threaded rods in concrete block walls. DCN No. 1 specifies the requirements for maintaining minimum edge distance and spacing of through bolts and threaded rods relative to the installation of supports for boxes, electrical conduit and instrument tubing.

Subsequent to the NRC Inspection, Quality Control commenced inspection of the electrical conduit supports installed on the concrete block walls to the requirements of Drawing C-805, Sheet 2, Revision 10 and DCN 1. NCR 4801 was issued on 11/6/79 to document the discrepant thru bolt installations which have been identified as generic in nature for Areas 12 and 21 on Elevation 771. In addition, the NCR notes that Quality Control was not made aware of this installation via issuance of an excavation checklist as required by FP-C-1, Revision 6.

Field Engineering has evaluated the suspect supports and has identified those supports which are acceptable-as-is, and those supports requiring rework.

2. Corrective Steps Which Have Been Taken To Avoid Further Items Of Noncompliance:

Training sessions were conducted for field engineers on 12/27/79, 1/8/80 and 1/31/80 on the installation of thru bolts. The requirements of FP-C-1 relative to completion of excavation checklists, thereby notifying QC prior to drilling for thru bolts, were reemphasized during these sessions.

3. Date When Full Compliance Will Be Achieved:

NCR 4801 was issued on 11/6/79 to document and control the nonconforming thru bolts and the training sessions were completed on 1/31/80.

- C. 10CFR 50, Appendix B, Criterion V, states in part, "Activities affecting quality shall be prescribed by documented instructions....and shall be accomplished in accordance with those instructions, procedures....."

PSAR, Section D.2.5 states in part, "Activities affecting quality will be prescribed by documented instructions, procedures...."

PSAR, Section D.3.3.7 states in part, "...use of qualified procedures and application thereof as required by established standards will be rigidly enforced."

Section 5.1.3 of Spec. G-21, Revision 1 states in part, "...instrument lines...shall have at least three foot horizontal or vertical separation or...a physical barrier equivalent to twelve gauge sheet steel...."

Contrary to the above, on 10/30/79, the instrument tubing installation for redundant flow transmitters FT-08612A and FT-08623B did not meet separation criteria or barrier requirements specified in Paragraph 5.0 of Spec. G-21, Revision 1.

1. Corrective Steps Which Have Been Taken and Results Achieved:

NCR 4788 was written to identify and control the nonconforming condition and has been dispositioned requiring the installation of the necessary separation barrier.

2. Corrective Steps Which Have Been Taken To Avoid Further Items Of Noncompliance:

A drawing review has been conducted in order to verify incorporation of division and color code information on isometrics for seismic tubing. Numerous drawings lacked this information; all masters have now been revised to include the required information. All production print copies of the drawings have been red-lined to provide the division and color code information. All completed systems have been walked down and no separation criteria violations were observed. The cognizant field design and area instrument engineers have been re-instructed in the separation requirements of Spec. G-21.

3. Date When Full Compliance Will Be Achieved:

NCR 4788 disposition was approved on 11/29/79. Drawing corrections and area walkdowns were completed 1/22/80.

Field Engineering signed off the NCR on 2/22/80 noting that the work is complete. The NCR is now in QC review awaiting verification and closeout.

We trust the Commission will find these measures acceptable.

Very truly yours,



A. R. Sabol
Manager-Nuclear Quality Assurance

Mr. R. T. Carlson

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February 27, 1980

ARS:mcb

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