

**PP&L**

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February 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 SEPTEMBER 10-OCTOBER 5, 1979  
REPORT NO. 50-387/79-31 AND 50-388/79-16  
ERs 100450/100508                      FILE 840-4  
PLA-456

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Dear Mr. Carlson:

Reference is to your letter of January 18, 1980 which forwarded combined IE Inspection Reports 50-387/79-31 and 50-388/79-16 and "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 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.

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

10CFR50, Appendix B, Criterion VI, states, in part: "These measures shall assure that documents, including changes, are reviewed for adequacy and approved for release by authorized personnel..." The Susquehanna PSAR Section D.2.6, states, in part: "When applicable, suppliers will be required to maintain document control systems to assure that documents, including changes, are reviewed for adequacy and approved for release by authorized personnel...."

The General Electric Installation and Service Engineering (GEI&SE) Nuclear Quality Assurance Manual Section 7.7 states, in part: "Revised documents shall be reviewed, approved, released, and distributed in the same manner as original documents."

Contrary to the above, as of September 19, 1979, GE I&SE Procedure SRSE 1-12, Revision 2, had been approved for use without an adequate review as indicated by three instances of failure to refer to the correct detailed welding procedure, incorrect identification of one welder qualification procedure as a detailed welding procedure and



failure to include references to two detailed welding procedures. As a result, welding could have been performed by welders who were not properly qualified.

(1) Corrective Steps Which Have Been Taken and the Results Achieved:

As a result of the Inspectors findings, an I&SE Field Revision Request (FRR) was prepared. Subsequently, GE I&SE Procedure SRSE 1-12, Revision 3, dated September 20, 1979, was issued to correct the above listed discrepancies. The Owner's Representative (PP&L NPE) accepted the revision to the procedure on 9/27/79 and the I&SE QA Manager, based on the Owner's approval, signed off on the revision on 9/28/79. As noted in the Inspector's report, the welders performing welds in accordance with the procedures identified in Revision 3 or SRSE 1-12 were qualified with the correct welder qualification procedure.

(2) Corrective Steps Which Have Been Taken to Avoid Further Items of Noncompliance:

The Assistant to the Manager-Nuclear Plant Engineering has emphasized the need for special care and attention to detail on the part of responsible engineers in their review of procedures which are to be used for the modification of the recirculation system nozzles. This increased emphasis and attention to detail should minimize the possibility of such errors occurring in the future.

(3) Date When Full Compliance Was Achieved:

GE I&SE Procedure SRSE 1-12, Revision 3, was issued September 20, 1979. As mentioned in paragraph 5.b of the Inspection Report, the revision corrected all of the listed discrepancies.

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

10CFR50, Appendix B, Criterion V, states, in part: "Activities affecting quality will be prescribed by documented instructions, procedures or drawings appropriate to the circumstances."

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-W-1, Revision 7, Section 3.1.1 states, in part: "All piping and integral...piping attachments shall be welded in accordance with the procedures specified on drawing 8856-M-198 for the applicable pipe class..." and in Section 3.1.6 states, in part: "All other welding requirements are to be referred to the Lead Field Welding Engineer for determination of proper procedure."

Procedure FCI M-174, Revision 3, and Procedure P8-T-AG-I-0-1 were applicable to the weld buildup VRR-B31-2-FW-B-13M.

Contrary to the above, water quenching which was required and accomplished for weld VRR-B31-2-FW-B-13M was not specified in the applicable procedures.

(1) Corrective Steps Which Have Been Taken and the Results Achieved:

The Bechtel Field Procedure, FCI-M-174, Revision 4 (Instruction for Bechtel Support for N2 Nozzle Modifications) was revised, approved by General Electric, Bechtel and PP&L and issued for project use on 10/23/79. It describes the quenching method utilized for the N2 nozzle modification on weld VRR-B31-2-GW-B-13M.

(2) Corrective Steps Which Will Be Taken to Avoid Further Items of Noncompliance:

The assistant project field engineer responsible for reviewing and approving special field instructions has been assigned the responsibility for assuring all relevant information and details are included in future similar instructions.


(3) Date When Full Compliance Was Achieved:

Revision 4 to FCI-M-174 has been approved by General Electric, Bechtel Project Engineering and PP&L. As noted in paragraph 5.c of the Inspection Report, Revision 4 was issued for approval during the inspection and subsequently approved for use on October 23, 1979.

In response to your concerns regarding PP&L management controls for the recirculation system modifications described in our letter PLA-350 of May 4, 1979, we feel that our present system has been adequately defined for internal purposes and has been properly implemented. We will, however, review our system for managing such modifications and provide the Commission with a detailed description of how PP&L coordinates its activities for accomplishing work such as the recirculation riser modification. Our response to this element of your concern will be submitted by March 31, 1980.

We trust the Commission will find that the actions taken to resolve the infractions identified in the referenced Notice of Violations are adequate.

Very truly yours,

  
A. R. Sabol  
Manager-Nuclear Quality Assurance

ARS:mcb

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