

PP&L

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March 17, 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 DECEMBER 3, 1979 - JANUARY 4, 1980
REPORT NO. 50-387/79-41 AND 50-388/79-22
ERS 100450/100508 FILE 840-4
PLA-460

Dear Mr. Carlson:

Reference is to your letter of February 1, 1980 which forwarded combined IE Inspection Reports 50-387/79-41 and 50-388/79-22 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.

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 prescribed by documented instructions... and shall be accomplished in accordance with these instructions."

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."

The Bechtel Engineering Procedures Manual, Revision 8, states in part, in Section 4.1, "A Q designator is placed in the title block of the drawing to identify those drawings which control activities affecting the quality of Q listed items in design, procurement, fabrication, inspection, construction or installation. Q designators will not be placed on sketches or stress isometrics;" and in Appendix B, "The Stress Isometric is not intended for fabrication, installation or verification of installed piping and pipe supports. The area drawings, and pipe support details control the construction and verification requirements."

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Contrary to the above, Field Engineering has supplied information to Quality Control regarding final inspection and turnover of pipe supports based on uncontrolled drawings, the stress isometrics. Consequently, three piping systems were turned over to the licensee with final inspections of pipe supports based on documents not intended for installation or verification of pipe supports.

1. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND RESULTS ACHIEVED:

The site is now on distribution for and in receipt of the SMALL PIPE INDEX STATUS REPORT sorted by stress iso/status and the STRESS ISO STATUS REPORT which shows the current Project Engineering revision levels for all small pipe and large pipe stress isos respectively. Both reports will be received by the Field on a monthly basis as issued by the San Francisco home office. This action was completed as of 3/14/80.

2. CORRECTIVE STEPS WHICH ARE BEING TAKEN TO AVOID FURTHER ITEMS OF NON-COMPLIANCE:

- (a) The Field has requested microfilm and/or sepia copies of all stress isos from the San Francisco home office. This consists of approximately 800 large pipe and 1600 small pipe stress isos. Upon receipt, the revision levels of all the stress isos will be checked by print room personnel against the current revision level as shown on the applicable current status report. All stress isos will then be placed into the site drawing control program in accordance with FP-G-4. Completion of this action is anticipated by 4/4/80.
- (b) The STRESS ISO STATUS REPORT is currently being reviewed by Field Engineering to assure that the latest revisions of the stress isos were used to determine system hangers for systems turned over prior to the implementation of drawing control requirements on stress isos. In those instances where the latest revision was not used, the correct revision of the stress iso will be compared to the revision used and any discrepancies relative to the hangers identified for turnover with the system will be processed in accordance with FIP-G-3. It is anticipated that this action will be completed by 4/18/80.
- (c) Small pipe stress isos have not, in the past, been used by Field Engineering to identify system hangers for turnover. The small pipe hanger fab iso which is developed and controlled by the field shows all system hangers and their locations and is the document used by Field Engineering to identify system hangers. Although the small pipe hanger fab iso is developed using the small pipe stress iso, the field has the latitude to deviate from the stress iso and reroute piping up to 20% of the total amount between anchor points per specification M-204. The field must therefore relocate and add or subtract hangers as necessary based on the field reroute. The latest field small pipe hanger fab iso must therefore be used to identify system hangers at turnover time. Paragraph 7.3.1 of Field Procedure FP-G-19 was amended

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by memo on 3/18/80 to eliminate the conflict between the accepted practice and the requirement of the cited paragraph. The change will be included in Rev. 4 of the field procedure. FCR P-2521 against specification M-213 was approved 3/20/80 and defines field latitude for relocating, adding, subtracting and modifying small pipe supports.

Field as-built small pipe hanger fab isos will be reviewed and the stress analysis rechecked by Project Engineering after system turnover. A QC final inspection and acceptance of these hangers will be performed after the reconciliation with stress requirements has been completed and the as-built small pipe hanger package has been issued.

Exception list items currently exist on all turnover packages for the QC inspection of hangers. These exception list items will remain open pending the final inspection/acceptance by QC on all system hangers as described above.

- (d) In order to avoid future misunderstandings over the use of stress isos in the field, the EPM will be clarified to show that the stress iso may not be used for field fabrication, installation or QC verification, but may be used by Field Engineering for information as required.

Paragraph 1.5 of Section III to Appendix B of the EPM will be clarified to read as follows:

"The stress isometric is not intended for fabrication, installation or Quality Control Verification of installed piping and pipe supports. The area drawings and pipe support details control the construction and Quality Control verification requirements; however, the stress isometric is issued to Field Engineering for information."

This change will be issued on/or before 4/1/80.

- (e) A review of other drawings applicable to the installation of piping and pipe hangers (i.e. large pipe hanger details, small pipe support summary sheets, etc.) is being performed to determine whether similar document control discrepancies exist with other drawings. Completion of this review and implementation of any resultant corrective action is anticipated by 5/1/80.

3. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

It is anticipated that full compliance will be achieved by 5/1/80.

We trust the Commission will find these actions taken to resolve the infraction are adequate. Also note that R. McGaughy, NRC Region I, was notified by

Mr. Robert T. Carlson

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C. I. McVicker of PP&L on March 18, 1980 that the response to this infraction would require an additional week for a complete reply.

Very truly yours,



A. R. Sabol
Manager-Nuclear Quality Assurance

ARS:mcb

cc: Mr. Robert M. Gallo
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