

PP&L

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June 13, 1980

Mr. Robert T. Carlson
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U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pennsylvania 19406

SUSQUEHANNA STEAM ELECTRIC STATION
NRC INSPECTION OF SEPTEMBER 10-OCTOBER 5, 1979
REPORT NO. 50-387/80-01 AND 50-388/80-01
ERs 100450/100508 FILE 840-4
PLA-494

Dear Mr. Carlson:

Reference is to your letter of May 14, 1980 which forwarded combined IE Inspection Reports 50-387/80-01 and 50-388/80-01 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 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...."

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

Chapter 22, Section 5.1.1 of the Start-up Procedures Manual states, in part, "From the time of blue tagging up until the system is placed into an initial operation mode, PP&L plant staff will continue applicable portions of the Bechtel Construction storage and maintenance program as recommended by the Startup engineer via Startup Work Request."

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Contrary to the above, during the period February 16, 1979 through January 24, 1980, several essential 480 volt Motor Control Centers had been turned over to the PP&L plant staff for blue tagging but as of February 27, 1980 no Startup Work Requests had been issued by the Startup Engineer regarding the continuation of applicable portions of the storage and maintenance program. As a result, space heaters in motor control centers were not energized, as required.

(1) CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

All space heaters in motor control centers have been identified, energized and are checked periodically by operations personnel.

(2) CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER ITEMS OF NONCOMPLIANCE:

A training session for the Integrated Startup Group was held on 3/11/80 to review the infraction and to discuss the procedures for implementation of the PP&L Plant Staff Maintenance responsibilities. Procedure AD 6.10, Equipment Maintenance and Operations Control, has been revised to better define the responsibilities for notification and performance of maintenance following turnover from construction. The responsible startup engineer now transmits the specific details of the construction storage and maintenance program and any additional requirements, based on the vendor's instruction manual, to Plant Staff Maintenance for implementation.

The above steps have been checked and are subject to periodic audit by PP&L Nuclear Quality Assurance personnel.

(3) DATE WHEN FULL COMPLIANCE WAS ACHIEVED:

Procedure AD 6.10, Revision 3 became effective May 14, 1980.

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

10CFR50, Appendix B, Criterion XI states, in part, "A test program shall be established to assure that all testing required to demonstrate that structures, systems and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents."

The Susquehanna PSAR Section D.2.11 states, in part, "The Applicant's Quality Assurance Program requires Principal Contractors to include the designation of appropriate tests to be performed...."

Bechtel Specification M-214 Paragraph 1 states, in part, "Testing shall be in accordance with ... the ASME Boiler and Pressure Vessel Code, Section III, ..."

The ASME Boiler and Pressure Vessel Code, Section III Paragraphs NC 6100 and NB-6221, requires that completed components, appurtenances ... and/or systems shall be subjected to a hydrostatic test pressure that at every point in the component, appurtenance or system is not less than 1.25 times the design pressure.

Bechtel Drawing M-199 specifies, for Core Spray Pump discharge piping, GBB-101, a design pressure rating of 500 psig, and for Residual Heat Removal Pump discharge piping, GBB-104, a design pressure rating of 450 psig.

Contrary to the above, as of February 29, 1980, portions of Core Spray Pump discharge piping, GBB-101, were hydrostatically tested to approximately 50 psig instead of 625 psig as required and portions of the Residual Heat Removal Pump discharge piping, GBB-104, were hydrostatically tested to approximately 188 psig instead of 563 psig as required.

(1) CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

Bechtel field personnel were requested to identify all ASME III pump discharge piping hydrostatic tests that did not comply with the requirements of NB-6221.

Bechtel initiated NCR 5953 which identifies ten pump discharge lines that had unacceptable hydrostatic tests performed.

(2) CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER ITEMS OF NONCOMPLIANCE:

Paragraph 10 of Bechtel Specification 8856-M-214 (Schedule of Hydrostatic Test Pressure) will be revised to indicate that NB-6222(6) of the code does not allow hydrotesting of pump discharge piping at reduced test pressures.

(3) DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Bechtel Specification 8856-M-214 will be revised by June 27, 1980. The ten pump discharge lines identified in NCR 5953 will be hydrostatically tested in accordance with code requirements by October 1, 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,



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Manager-Nuclear Quality Assurance

JS:mcb

cc: Mr. Robert M. Gallo
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