

NORMAN W. CURTIS  
Vice President - Engineering & Construction - Nuclear  
821-5381

October 22, 1980

Mr. Robert T. Carlson  
Chief RC & ES Branch  
U. S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

SUSQUEHANNA STEAM ELECTRIC STATION  
NRC INSPECTION REPORT 387/80-21 and 388/80-14  
ERS 100450/100508                      FILE 840-4  
PLA-562

Dear Mr. Carlson:

Reference is to your letter of September 15, 1980 which forwarded IE Inspection Report 50-387/80-21 and 50-388/80-14 and "Appendix A, Notice of Violation".

Your letter advised that PP&L was to submit, within twenty (20) 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 (Deficiency) states as follows and the corrective measures are detailed below:

"10CFR50, Appendix B, Criterion V, states in part, "Activities affecting quality...shall be accomplished in accordance with (these) instructions, procedures or drawings."

The Susquehanna PSAR, Appendix D, Paragraph 3.3.3, states in part, "General procedures for carrying out...construction are contained in... Bechtel general and technical engineering standards..."

Bechtel Welding Standard, WFMC-1, Paragraph 6.9 states in part, "Individual welders shall keep their work areas clear of unauthorized or discarded filler material."

Contrary to the above, on August 19 and 20, 1980, unauthorized welding filler materials, specifically 12 unused rods of ER-308L and 6 rods of E-70S-2, were found at elevation 645' and 779' in the Unit No. 2 reactor building."

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

The following actions were taken to identify and remove unauthorized filler materials from work areas and craft gang boxes:

- (a) Supervision performed an audit of plant work areas which consisted of checking gang boxes, cable trays, etc., during a two week period ending 9/30/80.
- (b) Letters were issued to each foreman on the job requiring them to check any gang boxes for which they have responsibility for the presence of unauthorized filler materials, to stencil their names on their boxes, and to remind them that they are responsible to assure that their boxes remain free of such material. These letters were acknowledged by signature of the individual foremen and returned to the project superintendent on/or before 10/17/80.

(2) CORRECTIVE STEPS WHICH HAVE BEEN TAKEN TO AVOID FURTHER ITEMS OF NONCOMPLIANCE:

The following steps were taken to preclude further occurrences of having unauthorized filler materials in work areas and/or craft gang boxes:

- (a) A memo was issued by the lead field welding engineer on 9/2/80 and countersigned by the project field engineer requesting all field welding engineers to look for and identify, in writing, any unauthorized filler materials found in plant work areas so that supervision can take corrective action with their crafts.
- (b) General foremen/foremen meetings were held the week of 9/8/80 to reemphasize the importance of conformance to established procedures for weld rod control.
- (c) Ten/fifty-five gallon weld electrode stub barrels were fabricated and placed at key areas. These barrels are covered by lockable slotted lids which by design allow stubs to be deposited, but which prohibit unauthorized removal of the stubs.
- (d) The numbering of stub cans was implemented to ensure that all cans (either full or empty) are returned and not left in the field where unauthorized persons may be able to obtain filler metal stubs from them.
- (e) Monitoring by Bechtel Field welding engineers as well as daily inspections by Bechtel welding supervision of cable trays and other areas in addition to tool boxes and gang boxes will continue to ensure that all filler metal is properly controlled.
- (f) Letters were issued on 10/10/80 to all subcontractors involved in welding operations at the site reiterating the need for strict conformance to weld rod control procedures and requiring the subcontractors to perform frequent surveillance of their work areas and gang boxes in addition to their normal material control requirements.
- (g) All gang boxes and tool boxes which have not been checked and identified with a foreman's name (or other responsible individual) will be removed from the work areas. This will be accomplished on/or before 10/24/80.

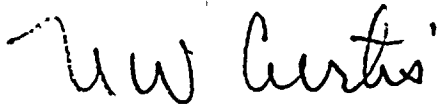
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(h) Bechtel Site Quality Assurance will perform weekly surveillance activities beginning the week of 10/20/80 and continuing until 1/81 to assure the successful implementation of the above corrective measures; thereafter, monitoring will continue on a periodic basis by Quality Assurance at a frequency as deemed appropriate.

(3) DATE WHEN FULL COMPLIANCE WAS ACHIEVED:

Full compliance will be achieved on/or before 10/24/80.

Very truly yours,



N. W. Curtis  
Vice President-Engineering & Construction-Nuclear

ARS:mcb

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