

PP&L

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NORMAN W. CURTIS
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October 13, 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 50-387/80-19 & 50-388/80-13
ERS 100450/100508 FILE 840-4
PLA-557

Dear Mr. Carlson:

Reference is to your letter of August 21, 1980 which forwarded IE Inspection Report No. 50-387/80-19 & 50-388/80-13 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 action 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.

During a telephone conversation with Mr. J. Mattia on October 9, 1980, Mr. A. R. Sabol of PP&L requested and was granted an extension on the original response deadline to October 15, 1980.

The Notice of Violation states as follows and the corrective actions 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 SSES, 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, "Cable and Wiring Installation Procedures", Drawing E-59, Revision 10, Paragraph 2.12, states: "Tray softeners shall be installed on all sharp edges of cable trays that could cause damage to cable jackets either during pulling or after installation of cable."

Contrary to the above, on 7/22/80, the following safety related cable trays were observed to have installed cables that were in contact or could have contacted sharp edges: F1PH63, F1K364, E1K115, F1PG31, E1KS14 and F1KS10.

PENNSYLVANIA POWER & LIGHT COMPANY

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

During the week of 7/21/80, the NRC inspector identified seven locations on cable trays at which he felt that cable jackets did, or could sometime in the future, come in contact with sharp edges of the trays.

Although it was determined that a specification violation did occur in one instance, and it was acknowledged that another condition could be considered questionable, it was felt that the majority of situations identified did not represent violations of the specified requirements; however, with the intent of precluding an NRC finding, softeners were immediately installed at all areas questioned by the inspector. Subsequently, Construction has been checking every safety related cable tray, where cables enter or exit the raceway, and applying or replacing cable tray softeners. This re-installation and verification work includes all areas and elevations of Units 1 and 2.

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

Memoranda were immediately issued (7/24/80) by the project field engineer and project field Quality Control engineer to all applicable personnel to reemphasize the procedural requirements for installation of cable tray softeners. In addition, Quality Control is incorporating an inspection activity to the PQCI (Project Quality Control Instruction) E-3.0, Revision 2, Raceway Barriers and Seals, for reverifying the correctness and completeness of cable tray softeners. This reinspection will identify any softeners that may have been inadvertently dislodged from the cable trays during other construction activities. It should be noted that the inspection activity of PQCI E-3.0 will be in addition to the initial inspection during cable installation as required in PQCI E-4.0, Installation of Class 1E Electrical Cables.

(3) DATE WHEN FULL COMPLIANCE WAS ACHIEVED:

1. Memorandums issued by project field engineer and project field Quality Control engineer on 7/24/80.
2. Construction application of cable tray softeners by 11/30/80.
3. PQCI E-3.0, revision by 11/15/80.
4. Quality Control verification of cable tray softeners will take place as cables are installed in raceways per PQCI E-4.0 and will be reverified in place at time of room turnovers per PQCI E-3.0.

Very truly yours,



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

FLW:mcb

Mr. Robert T. Carlson

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October 15, 1980

cc: Mr. Robert M. Gallo
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