

# PP&L

TWO NORTH NINTH STREET, ALLENTOWN, PA. 18101    PHONE: (215) 821-5151

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

September 10, 1980

Mr. Eldon J. Brunner  
Chief RO & NS Branch  
U. S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

SUSQUEHANNA STEAM ELECTRIC STATION  
NRC INSPECTION REPORT 50-387/80-14  
ER 100450                      FILE 840-4  
PLA-540

Dear Mr. Brunner:

Reference is to your letter of August 18, 1980 which forwarded IE Inspection Report 50-387/80-14 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.

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, ...are reviewed for adequacy and approved for release by authorized personnel and are distributed to and used at the location where the prescribed activity is performed."

The Susquehanna PSAR Section D.2.6, states, in part, "Measures will be established to control the issuance of documents, such as instructions, procedures, and drawings ... which prescribe activities affecting quality."

Plant Administrative Procedure AD-00-001, states, in Section 4.1, "The Superintendent of Plant is responsible for the final approval of all plant procedures."

Contrary to the above, Plant Maintenance Procedures MT-64-003 for removal of the recirculation pump seal and MT-GM-011 for repacking the recirculation pump discharge valve were in use, on June 25, 1980, at the location where the prescribed activity was being performed, the Unit 1 primary containment, and had not been approved by the Superintendent of Plant."

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

Upon notification of the situation, supervision made immediate arrangements to have the procedures in use replaced with procedures having the appropriate approval signatures. The physical work accomplished was reviewed in detail with the conclusion that there were no adverse effects on the affected components. Except for minor typographical errors, the procedures in use at the time of the occurrence were identical to the replacement 'approved' procedures.

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

- (a) The Supervisor of Maintenance discussed with all Maintenance management personnel the requirement to have properly approved procedures issued to personnel performing safety related work,
- (b) working practices employed in our procedure program were improved to minimize the time between Plant Operations Review Committee (PORC) review, Superintendent approval and issuance, and,
- (c) specific instructions to maintenance personnel regarding the use of approved procedures will be made part of the formal maintenance training program.

(3) DATE WHEN FULL COMPLIANCE WAS ACHIEVED:

Full compliance regarding this event was achieved on the date of occurrence, i.e., June 25, 1980.

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

"10CFR50, Appendix B, Criterion XV, states, in part, "Nonconforming items shall be reviewed and accepted, rejected, repaired or reworked in accordance with documented procedures."

The Susquehanna PSAR Section D.2.15, states, in part, "Initial responsibility for the identification, documentation, segregation and disposition of nonconforming material, parts, or components will rest with the...plant site as appropriate."

Startup Administrative Procedure AD 10.2, Startup Quality Program, states, in part, "During the Initial Test Program the performance of test activities on safety related or ASME Section III systems or components require quality verification. The quality verification of these activities is performed by Pennsylvania Power and Light Company personnel in accordance with the existing Pennsylvania Power and Light Company Quality Assurance Manual."

Quality Assurance Manual Procedure 8.2 states, in Section 4.4, "The Superintendent of Plant is responsible for Susquehanna SES during plant testing and startup and has overall responsibility for the Initial Test Program conducted by the Integrated Startup Group. The Superintendent of Plant delegates to the Plant Quality Supervisor the responsibilities described in the Preoperational Testing Inspection Function, SP-13, supplemental procedure."

Quality Assurance Manual Procedure SP-13, states, in Section 5.2.3, "Nonconformances detected during the performance of the preoperational testing inspection function shall be reported, controlled and dispositioned in accordance with QA Manual Procedure SP-11, as further amplified in the Plant Administrative Procedures Manual."

Plant Administrative Procedure AD-00-033, Attachment A Entry Number 8, states that a copy of the Nonconformance Report is sent to the Technical Supervisor for evaluation, to determine reportability to the NRC. Attachment A Entry Number 10, requires the signature of the Section Supervisor who is authorizing and approving the disposition.

Contrary to the above as of June 9, 1980, a nonconforming condition, defective yokes of valves labeled as HV-1F034C and D, identified during Residual Heat Removal system testing, was initially documented on Startup Work Request No. 1112, not a Nonconformance Report thereby permitting corrective action to be undertaken without the required evaluation for reportability or the approval of the disposition/corrective action."

This is an infraction.

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

The initiation and approval of Startup Work Request, SWR No. 1112 on 6/9/80 was evidence that PP&L's Integrated Startup Group (ISG) had recognized the necessity to have Bechtel participate in the resolution of the nonconformance and to coordinate a remedy with the valve supplier. In this instance, it was appropriate to enlist Bechtel's participation because of Bechtel's relationship with the supplier during the initial procurement process.

Upon approval of the SWR, the Bechtel Quality Assurance Program was applied to the condition with following results:

- o Bechtel NCR 5980, which was validated and dispositioned on June 9, 1980, documented and controlled the defective yokes.
- o Bechtel MCAR 1-59 was issued on June 13, 1980 which required that the condition be evaluated for reportability pursuant to 10CFR50.55(e).
- o The NRC was verbally informed of the condition on June 17, 1980 and in writing on July 7, 1980 in accordance with the requirements of 10CFR50.55(e).

The above suggests that, while there were administrative difficulties with the description in PP&L's QA procedures, the condition was properly identified as a nonconforming condition in accordance with Bechtel's QA Program and, at no time, was the condition in jeopardy of going undetected or uncontrolled. Therefore, since the principal issue appears to have been ambiguities in PP&L's procedures and not the control of nonconforming equipment, it appears that the noncompliance identified by the NRC inspector should have, more appropriately, been classified as a "Deficiency".



September 10, 1980

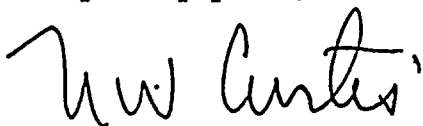
(2) CORRECTIVE STEPS WHICH HAVE BEEN TAKEN TO AVOID FURTHER ITEMS OF NONCOMPLIANCE:

PP&L QA Manual Procedure SP-11, Rev. 4 Control of Nonconformances, is being revised to accommodate the Contractor's NCR in lieu of PP&L's NCR when reentry of Bechtel to work on PP&L equipment has been requested via a PP&L Startup Work Request (SWR).

(3) DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Revision 4 to SP-11 will be issued by September 22, 1980.

Very truly yours,



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

CIM/ARS:mcb

cc: Mr. Robert M. Gallo  
U. S. Nuclear Regulatory Commission  
P. O. Box 52  
Shickshinny, Pennsylvania 18655



bcc: Ms. M. C. Barto - N4  
Mr. N. W. Curtis - N4  
Mr. R. H. Featenby - SSES  
Mr. J. W. Gelling - N5  
Mr. S. L. Denson - SSES  
Mr. E. J. Gorski - SSES  
Mr. P. R. Kyner - SSES  
Mr. B. D. Kenyon - N4  
Mr. E. M. Mead - N5  
Mr. E. M. Nagel - TW2  
Mr. R. J. Shovlin - N4  
Mr. S. H. Cantone - N4  
Mr. W. E. Barberich - N4  
SP&E Correspondence File - N3  
Susquehanna Letter File - N3  
Mr. H. W. Keiser - SSES