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November 18, 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 SEPTEMBER 17-25, 1980
REPORT NO. 50-387/80-25 & 50-388/80-16
ERS 100450/100508 FILE 840-4
PLA-573

Dear Mr. Carlson:

Reference is to your letter of October 20, 1980 which forwarded IE Inspection Report 50-387/80-25 and 50-388/80-16 "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:

10CFR50, Appendix B, Criterion V, states, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and...shall include appropriate quantitative or qualitative acceptance criteria...".

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

Section 16.1.2 of Specification 8856-C-8, states, in part, "All fillings shall be bonded tightly to the surface of the holes, shall be sound and free from shrinkage cracks and hollow sounding areas...".

Contrary to the above, during September 17-25, 1980, field procedure FP-M-1 was in use which did not contain the required quantitative or qualitative acceptance criteria. As a result, post equipment turnover repair of Q-listed grouting was necessary to extend equipment warranty.

This is an infraction.

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

FP-M-1 currently requires the responsible mechanical field engineer to

check for voids in the grouting under equipment bases by lightly tapping with a hammer. The NRC inspector's citation concerns the lack of acceptance criteria in the procedure for this operation; i.e., is 80% fill acceptable? 90%, etc.?

Bechtel Field Engineering has performed a review of Field grouting operations including inspection and acceptance requirements and has determined that the percentage of fill that is acceptable will vary with different equipment and is best determined by the vendor; however, 100% fill is desirable in all cases. Therefore, for future grouting operations, this element will be governed by Field Procedure FP-C-4, which has been amended to assure complete fill/complete contact with the top plate of the base (for equipment bases that are enclosed) at the time of the grouting operation. Paragraph 14.4 of this procedure now specifically states that when grouting equipment bases that are enclosed, (box type bases), "...the base plate shall be lightly sound tapped during the grouting operation to provide further assurance that the grout is in complete contact with the top plate of the base." This is seen as the logical time to perform these activities since any voids observed or detected can be eliminated via additional prodding, vibrating, etc. The void check prescribed in FP-M-1 will therefore be deleted having been replaced with a similar requirement in FP-C-4.

For those equipment bases which have been grouted to date without benefit of a void check by hammer tapping, an NCR will be initiated citing all such bases as quality indeterminate. The percentage fill and acceptability thereof will be determined by disposition on a case by case basis.

In addition to the above, Quality Control Inspection Plan, C-1.10, is in the process of being revised to incorporate the pertinent inspection activities of FP-C-4.

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

In order to avoid further items of noncompliance the following action was taken:

A training session was held on 11/5/80 by the lead QCE to inform cognizant QCEs of the new provisions of FP-C-4.

3. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

- (a) FP-C-4 was amended on 10/31/80
- (b) Training sessions for cognizant QC personnel were held on 11/5/80 for FP-C-4 requirements
- (c) An NCR identifying all box type base plate grouting completed prior to the FP-C-4 change will be generated by 11/21/80
- (d) QCI C-1.10 will be revised by 12/31/80
- (e) FP-M-1 will be revised by 12/31/80

Full compliance will be achieved by 12/31/80 for items (a) through (e) above.

Mr. Robert T. Carlson

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We trust the Commission will concur that the actions taken to date are adequate.

Very truly yours,



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