

PP&L

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January 7, 1981

Mr. Robert T. Carlson
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U. S. Nuclear Regulatory Commission
631 Park Avenue
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SUSQUEHANNA STEAM ELECTRIC STATION
NRC INSPECTION REPORT 50-387/80-17 & 50-388/80-11
ERS 100450/100508 FILE 840-4
PLA-606

Dear Mr. Carlson:

This refers to your letter of December 3, 1980, which raised a concern relative to information and circumstances surrounding PP&L's response (Ref. PLA-533, dated October 6, 1980) to the subject NRC inspection.

Your letter dated December 3, 1980 advised that PP&L was to respond within 30 days of the receipt of the letter addressing:

"The actions you have taken to assure yourselves that questionable inspection practices similar to that detected in the civil area, or other practices that may negate the purposes of the quality assurance program, do not exist in the other craft disciplines. In your response include any findings to date and a schedule for the anticipated completion of your actions."

After PP&L responded to the NRC letter of August 15, 1980 with PLA-533, I was also concerned about our program so I personally initiated steps to further investigate this situation. Your second letter was later received and stated concerns similar to mine.

An extensive record review was accomplished to determine if the same generic problem, as reported to you in our letter PLA-553, dated October 6, 1980, existed in other areas or if other practices that may negate the purposes of the quality assurance program exist in other craft disciplines. Our investigation revealed that the same generic problem does not exist in other areas outside the civil discipline. The investigation did identify a few isolated conditions which require further investigation and eventual rectification.

By my direction, Bechtel QA and PLNQA performed an extensive investigation of Bechtel QC inspection plans and records. In its investigation Bechtel QA, in Field Audit 17-1-9, examined six hundred and forty-five (645) completed

Quality Control Inspection Records. The following listing categorizes the records by discipline and construction activity:

<u>Discipline</u>	<u># of Records Reviewed</u>	<u>Inspection Records Re:</u>
Mechanical	166	Pumps, mechanical equipment, hangers, large and small piping and welding
Electrical	301	Cable pulls, terminations, electrical equipment, raceways & supports and motors
Instrumentation	53	Tubing, supports and instrumentation
Civil	125	Structural steel, concrete, concrete testing, expansion anchors and cadwelding

The Bechtel investigation was closely followed by the NQA site organization and a concerted effort was made to sample and verify the results of the Bechtel QA efforts.

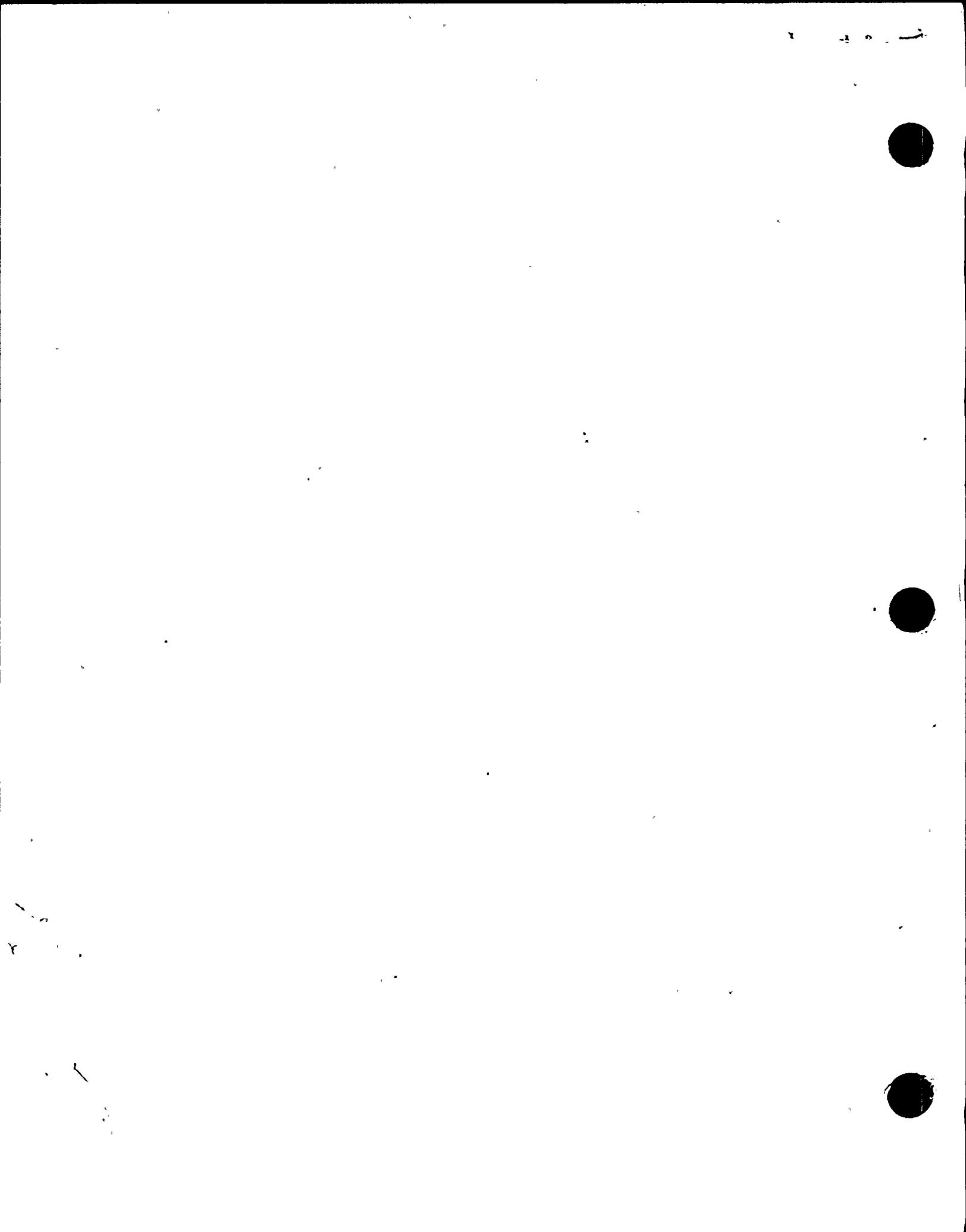
We have determined that a factor contributing to the initial problem in the civil discipline (concrete work principally) stems from the interpretation/misinterpretation of two paragraphs in the quality control inspection procedure PSP-G-6.3 which state as follows:

"8.9 If the work to be inspected in the field does not include all the activity/tasks shown by the approved document establishing inspection criteria for which the Quality Control Instruction was originally written, the non-applicable inspection requirements may be deleted from the Inspection Record.

8.10 Deletions are made by drawing a single line through the activities or tasks to be deleted. In all instances the original entry shall remain legible. All such deletions shall require the signature or initials and date of the Quality Control Engineer responsible for making the deletion and an explanation of the reason for the deletion, i.e., "NA" (Not Applicable). The modified Inspection Record shall be processed and distributed in the normal manner."

We found some instances where the instructions led to the close-out of inspection records before the inspections had been completed. However, we also found that most cases were covered by having a subsequent QCIR issued to cover final inspection at a later date. We did conclude however, that the practice was unwieldy and put an undue burden on QC to follow-up and maintain a separate status for traceability and accountability. We intend to have Bechtel clarify this language to preclude further misinterpretations.

The second aspect which contributed to the problem in the civil area (for concrete work) resulted from the use of a poorly composed note which was the subject of your earlier letter and was identified in the attendant Notice of Violation (Infraction). Our investigations revealed that the note was subject



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to misinterpretation and, therefore, not consistently followed up. We have since identified those instances where said note was improperly applied and are systematically pursuing their complete resolution.

In addition to the actions we have taken to date, we plan to correct the condition and provide the following plans for accomplishment thereof:

1. For records that are already complete and in the record vault, we intend that at the time of turnover of these records for microfilming, PP&L will do an extensive record review for completeness and correctness, and if problems are found, they will be controlled as nonconforming conditions with appropriate dispositions and reinspections.
2. For future inspections we are directing our constructor to revise his PSP procedure to more clearly define how an inspection can be transferred from one closure mechanism to another closure mechanism and to provide some means of tracing this action to reduce the possibility of reaching the point of turnover with missed inspections.

We expect this action to be complete by March 30, 1981.

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

Very truly yours,



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Vice President-Engineering & Construction-Nuclear

ARS:mcb

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