

**PP&L**

TWO NORTH NINTH STREET, ALLENTOWN, PA. 18101    PHONE: (215) 770-5151

NORMAN W. CURTIS  
Vice President-Engineering & Construction-Nuclear  
770-5381

February 23, 1981

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

SUSQUEHANNA STEAM ELECTRIC STATION  
NRC INSPECTION REPORT 50-387/80-32  
ER 100450                      FILE 840-4  
PLA-640

Dear Mr. Brunner:

Reference is to your letter of January 26, 1981 which forwarded IE Inspection Report 50-387/80-32 and "Appendix A, Notice of Violation."

Your letter advised that PP&L was to submit, within twenty days of receipt, a written explanation addressing (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved.

The Notice of Violation states as follows and the corrective measures are detailed below:

10 CFR 50 Appendix B, Criterion VI states in part: "Changes to documents shall be reviewed and approved by the same organizations that performed the original review and approval ..."

The Susquehanna FSAR Subsection 14.2.4.3, Procedure Modifications, states in part: "Review and approval requirements for Test Change Notices (TCN) are the same as for the original procedure as described in subsection 14.2.3.2."



February 23, 1981

Susquehanna FSAR Subsection 14.2.3.2, Procedure Review and Approval, states in part that the Test Review Board (TRB) is responsible for recommending approval of test procedures, and that upon completion of review and inclusion of required changes, preoperational tests can be submitted for approval by the Superintendent of Plant.

Contrary to the above, Startup Administrative Manual Procedure AD7.7 Revision 1, Preoperational/Acceptance Test Implementation, approved April 9, 1980 and in effect since May 1, 1980, states in Section 5.3.2 that TCN review and approval requirements are made by the TRB not the Superintendent of Plant. Further, TCN's number 001 and 002 to Preoperational Test P5.1C Revision 1, "ESS 480 Volt Motor Control Centers and Auxiliaries" were reviewed and approved by the TRB and approved by the TRB Chairman on September 4, 1980.

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

A review of TCN Files was performed to verify that the two TCN's identified in the NOTICE OF VIOLATION were the only "intent" changes implemented since May 1, 1980 that did not receive Superintendent of Plant approval prior to implementation. These two TCN's were approved by the Superintendent of Plant the week of February 2, 1981.

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


A change is being processed which will modify FSAR paragraph 14.2.4.3 to place review and approval authority for TCN's with the TRB. This change will be incorporated into a future revision of the FSAR. After implementation of this revision, the Startup Administrative Manual Procedure AD7.7 will be compatible with the FSAR.

(3) DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

The change in the FSAR is anticipated to appear in a future revision which is scheduled for release prior to March 31, 1981.

We trust the Commission will find this response to the Notice of Violation to be satisfactory.

Very truly yours,



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


FLW:sab

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

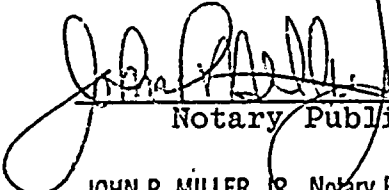
AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA)  
: SS  
COUNTY OF LEHIGH )

I, NORMAN W. CURTIS, being duly sworn according to law, state that I am Vice President, Engineering & Construction-Nuclear of Pennsylvania Power & Light Company and that the facts set forth on the attached response by Applicants to the Notice of Violation dated January 26, 1981 are true and correct to the best of my knowledge, information and belief.

  
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Norman W. Curtis  
Vice President,  
Engineering & Construction-  
Nuclear

Sworn to and subscribed  
before me this 23<sup>rd</sup> day  
of February, 1981.

  
\_\_\_\_\_  
Notary Public  
JOHN P. MILLER, JR., Notary Public  
Allentown, Lehigh County, Pa.  
My Commission Expires May 24, 1981