

PP&L

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

February 25, 1981

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 OF JANUARY 5-8, 1981
REPORT NO. 50-387/81-01 AND 50-388/81-01
ERs 100450/100508 FILE 840-4
PLA-643

Dear Mr. Carlson:

Reference is to your letter of January 28, 1981 which forwarded IE Inspection Report 50-387/81-01 and 50-388/81-01 "Appendix A, Notice of Violation."

Your letter advised that PP&L was to submit, within twenty-five (25) days of receipt, a written explanation addressing (1) corrective action steps which have been taken and the 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. S. Ebnetter on February 19, 1981, Mr. A. R. Sabol of PP&L requested and was granted an extension from the original response deadline to February 26, 1981.

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

10 CFR 50, Appendix B, Criterion V, States, in part: "Activities affecting quality shall be prescribed by documented instructions, procedures...and shall be accomplished in accordance with these instructions, procedures..."

810.4300497

Section D.2.2 of FSAR Appendix D, Quality Assurance Program, states, in part, that, "The Quality Assurance Program for the Susquehanna Steam Electric Station Units 1 and 2 will be responsive to, and meet the intent of 10 CFR 50, Appendix B."

Quality Control Instruction E-5.0, Revision 3, Item 6, states in part, "that all specialized terminations shall have their applicable final inspection activities performed prior to becoming inaccessible for visual inspection due to progression of construction. Specialized terminations being terminations requiring shrink tubing...taping..."

Contrary to the above, on January 6, 1981, the inspector noted that cable FP2B054C in panel 2B24021 and cables FP2B0504A, B and C in panel 2B24601 were terminated, taped and bolted to the respective bus without prior inspection as required by the QCI-E5.0.

Our investigation of the four cable terminations identified by the NRC inspector in Inspection Reports 50-387/81-01 and 50-388/81-01 as having been completed without the QC in-process inspection as required by QCI-E-5.0 revealed that two distinct, unrelated conditions existed.

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

The termination identified by the inspector as cable FP2B054C in panel 2B24021 was determined to have been an isolated case which was caused by Field Engineering's issuance of a cable connection card which had not received the required QC sign-off prior to its issuance. QC noted, during their initial review of this cable connection card, that the cable didn't appear on the applicable schematic diagram and the card was returned unsigned to Field Engineering along with several other cable connection cards which had been appropriately signed-off by QC signifying that they were satisfactory for issuance to construction. NCR 6992 was written for the termination identified by the inspector and has been dispositioned requiring rework of the termination and inspection of the rework.

For the remaining three (3) terminations (cables FP2B0504A, B, and C in panel 2B24601), it was determined that an in-process inspection had been performed, but had not been properly documented by the Bechtel QC Engineer. NCR 7137 was initiated to document this condition. Bechtel QC has dispositioned NCR 7137 "Use As Is" and has submitted the NCR to Bechtel Project Engineering for approval.

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

To prevent conditions similar to that identified for the single termination from recurring, Bechtel QC Engineers will identify any unsigned connection cards in writing on the transmittal slips returning the cards to Field Engineering. In addition, a training session is scheduled for 2-28-81 to alert the responsible Field Engineers to the need to assure that proper QC sign-offs on all connection cards are obtained prior to issuance of the cards to construction forces.

February 25, 1981

To prevent the recurrence of the condition similar to that identified for the other three terminations, Bechtel QC held a training session with responsible QC Engineers on 2/5/81. The condition identified and the requirements to properly document all their in-process inspection activities were discussed. PP&L NQA is performing an audit, concurrent with a Bechtel QC investigation into this situation, to determine whether conditions of improperly documented in-process inspections exist for other cable terminations. PP&L NQA will evaluate the results of its audit and Bechtel QC's investigation for the need for further corrective action.

(3) THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

- (1) NCR 6992 was initiated 1/8/81 with closeout anticipated by 4/1/81.
- (2) NCR 7137 was initiated 2/5/81 with closeout anticipated by 4/1/81.
- (3) The Bechtel QC investigation of the extent of improperly documented inspection activities is anticipated to be completed by 2/27/81.
- (4) PP&L NQA's audit of extent of the improperly documented inspection activities is anticipated to be completed by 3/2/81.

Very truly yours,



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

CRW:sab


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

bcc: Mr. W. E. Barberich - N4
Mr. J. R. Calhoun - TW16
Mr. S. H. Cantone - N4
Mr. T. M. Crimmins - N4
Mr. N. W. Curtis - N4
Mr. S. L. Denson - SSES
Mr. R. H. Featenby - SSES
Mr. J. D. Green - SSES
Mr. B. D. Kenyon - N4
Mr. P. R. Kyner - SSES
Mr. H. F. Lilligh - Bechtel SSES
Mr. A. M. Male - N4
Mr. E. M. Mead - N4
Mr. E. M. Nagel - TW2
Mr. E. B. Poser - Bechtel SFHO
Mr. A. R. Sabol - N4
Mr. R. J. Shovlin - N4
Mr. J. B. Violette - Bechtel SFHO
SP&E Correspondence File - N3
Susquehanna Letter File - N3
QA Clerk - N3

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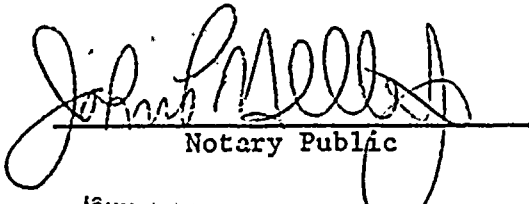
COMMONWEALTH OF PENNSYLVANIA)
 : SS
COUNTY OF LEHIGH)

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 28, 1981 are true and correct to the best of my knowledge, information and belief.



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

Sworn to and subscribed
before me this 25th day
of February, 1981.



Notary Public

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