



Pennsylvania Power & Light Company

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Norman W. Curtis
Vice President-Engineering & Construction-Nuclear
215 / 770-5381

August 10, 1981

Mr. Richard R. Keimig, Chief
Reactor Projects Branch 2, DRPI,
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

SUSQUEHANNA STEAM ELECTRIC STATION
NRC INSPECTION OF MAY 4 - JUNE 5, 1981
REPORT NO. 50-387/81-10
ER 100450 FILE 840-4
PLA-902

Dear Mr. Keimig:

Reference is to your letter of July 16, 1981 which forwarded IE Inspection Report 50-387/81-10 and "Appendix A, Notice of Violation" and "Appendix B, Notice of Deviation."

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 will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Your letter also requested that PP&L respond to the observations of Appendix B and the Deviation discussed in said inspection report.

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

"10 CFR 50, Appendix B, Criterion VI, states in part: "Measures shall be established to control the issuance of documents, such as instructions, procedures, and drawings, including changes thereto, which prescribe all activities affecting quality. These measures shall assure that documents, including changes, 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."

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PP&L PSAR, Appendix D, Section D.2.6 states in part: "Measures will be established to control the issuance of documents, such as instructions, procedures, and drawings including changes thereto, which prescribe activities affecting quality.

Startup Administrative Manual Procedure AD7.4, Revision 3, titled "Startup Technical Procedure Implementation" states in Section 5.4 that:

- a. The System Startup Engineer is authorized to make modifications to a specific procedure if it is necessary for successful completion of the procedure.
- b. Modifications are permitted as long as they do not deviate from the main intent of the technical procedure.
- c. All modifications shall be included and documented as an addendum to the technical procedures, and must be approved along with the procedure results.

Contrary to the above, an unapproved, unsigned document titled "HCU Venting Procedure" was being used in the control room by operators during the initial venting and coupling of control rod drive mechanisms in lieu of the approved Technical Procedure."

1. Corrective Action Taken and Results Achieved:

When it was determined that an unapproved procedure was in use the responsible Startup Engineer and the Shift Supervisor immediately had the procedure removed from use. The Shift Supervisor reinstructed the Operations personnel involved that only properly approved procedures were to be used for operation of plant systems and equipment.

The unapproved procedure was reviewed by the Startup Engineer and it was determined that this procedure did not change the intent of the approved procedure, TP2.26, but only added information that had been previously provided verbally by the Startup Engineer during discussions with Operations personnel concerning this testing procedure. This information was then formally incorporated into a Temporary Operating Procedure, approved as required and placed in the Control Room.

2. Corective Action Taken to Avoid Further Violations:

The Supervisor of Operations placed written instructions in the Plant Night Order Book and the Required Reading file reiterating requirements for the use of approved procedures for plant evolutions. All Operations personnel are required to review the Required Reading file and all Supervisors to review the Plant Night Order Book.



August 10, 1981

3. Date when Full Compliance Will be Achieved:

Full compliance was achieved when the Temporary Operating Procedure was approved and promulgated. The review of remedial instructions concerning the use of approved procedures described in 2. above will be completed by Operations personnel by September 1, 1981.

Your letter advised that we should also respond to the following Deviation identified in Appendix B addressing elements (1), (2) and (3) regarding corrective action:

"Based on the results of the inspection conducted on May 4 - June 5, 1981, it appears that one of your activities was not conducted in accordance with commitments made to the NRC as indicated below:

In response to FSAR Question 423.28 in Revision 22 to the FSAR, the licensee committed to perform loss of air testing to certain valves and dampers as indicated on Table 423.28-1 to the FSAR.

Contrary to the above, the Feedwater System Preoperational Tests P45.1, Revision 2, and P45.2, Revision 1 do not incorporate loss of air testing for air operated valves."

The following is submitted in response:

1. Corrective Action Taken and Results Achieved:

Test Change Notices (TCN) will be written for Preoperational Tests P45.1 and P45.2 and other involved procedures will be revised as appropriate to perform loss-of-air testing of required air operated valves and dampers as listed in FSAR Table 423.28-1. When these procedures are completed, all required valves and dampers will have been tested.

2. Corrective Action Taken to Avoid Further Violations:

The Integrated Startup Group (ISG) Quality Engineer will review all preoperational tests identified on Table 423.28-1 to verify that each of the identified valves and dampers have been included. In addition, each of the system startup engineers, for the systems identified in Table 423.28-1, have been verbally advised of the FSAR requirement.

3. Date when Full Compliance Will be Achieved:

The TCN's for Preoperational Tests P45.1 and P45.2 and the ISG Quality Engineer's review will be completed by August 14, 1981. TCN's will be written for other involved procedures that have already been issued by October 16, 1981. Procedures that are still in the draft stage will be revised prior to issue.

Very truly yours,



N. W. Curtis

Vice President-Engineering & Construction-Nuclear

ARS:sab



Mr. Richard R. Keimig

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August 10, 1981

cc: Mr. Gary G. Rhoads
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 July 16, 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 tenth day
of August, 1981.



Notary Public

JEAN A. SMOLICK, Notary Public
Allentown, Lehigh County, Pa.
My Commission Expires May 14, 1984

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