



Pennsylvania Power & Light Company

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August 20, 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 18-22, 1981
REPORT NOS. 50-387/81-12 & 50-388/81-06
ERs 100450/100508 FILE 840-4
PLA-914

Dear Mr. Keimig:

Reference is to your letter of July 27, 1981 which forwarded IE Inspection Report Nos. 50-387/81-12 and 50-388/81-06 and "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 will be taken to avoid further violations; and (3) the date when full compliance will be achieved.

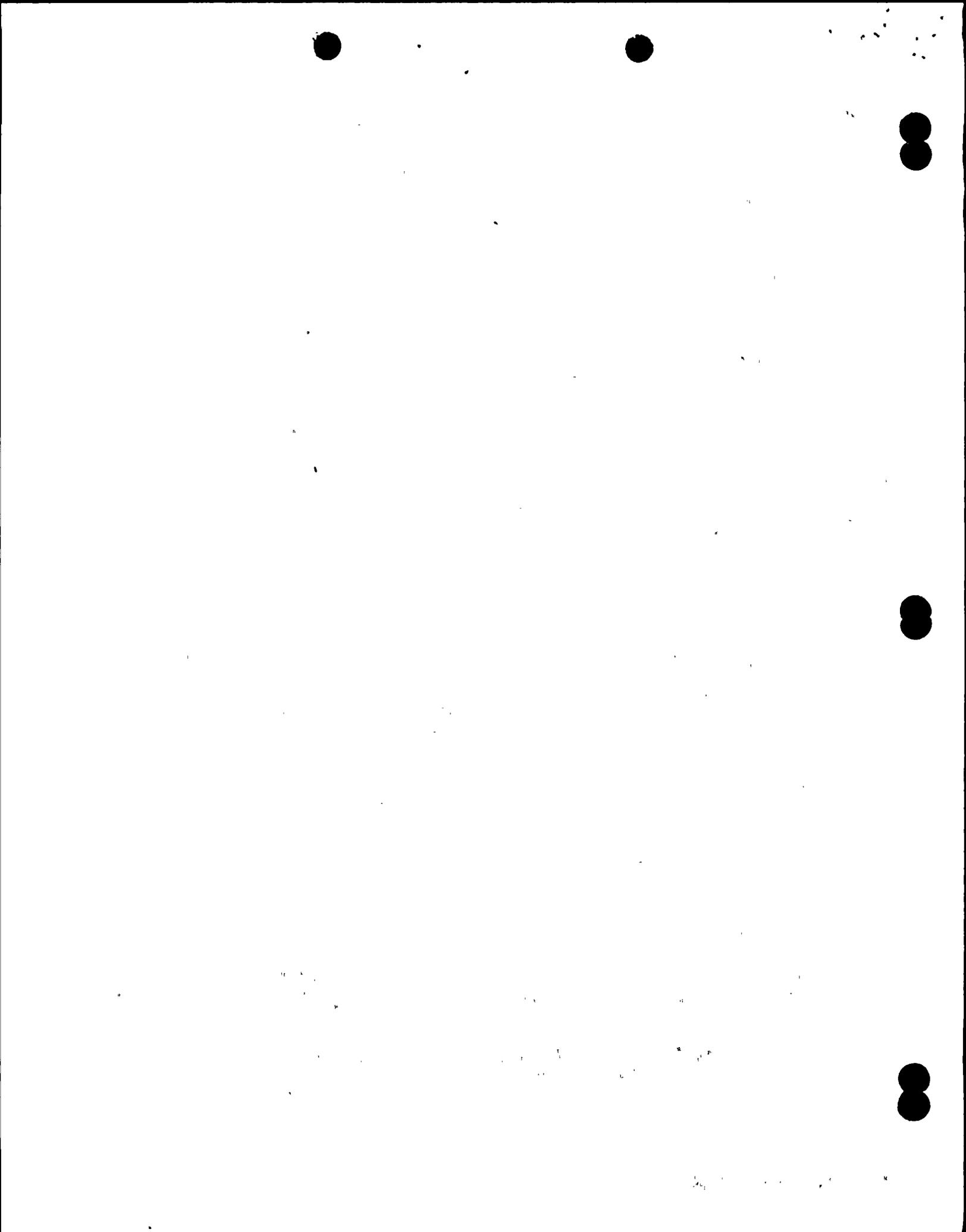
The Notice of Violation states as follows and the corrective actions are detailed below:

1. 10 CFR 50, Appendix B, Criterion V, states, in part: "Activities affecting quality shall be prescribed by documented instruction procedures. . .and shall be accomplished in accordance with these instructions, procedure. . ."

Section 2.3.4 of Drawing E-49, Sheet 9, Revision 10 on Conduit and Cable Tray Notes and Defects states, in part: "The minimum separation distances required between totally enclosed raceways located in areas not subject to fire. . .or mechanical damage shall be as follows:

- 2.3.4.1 One inch minimum between class 1E wireways, cable trays, or conduit. . ."

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2.3.4.2 One inch minimum between class 1E wireways, cable trays or conduit and similar non-class 1E raceways. . ."

Contrary to the above, on May 20, 1981 the inspector observed that the following conduits/tray installations did not meet the 1 inch separation criteria.

Unit 1 -

- Conduit No. FIP057 (green division) and Conduit No. EIK684 (red division).
- Conduit No. FIP479 (green division), adjacent Fire line conduit and Conduit EIK994 (red division).
- Conduit No. IP0059 (non-Q) and Conduit No. EIP349 (red division).
- Conduit No. IKG040 (non-Q) and Conduit No. FIKG07 (green division).

Unit 2 -

- Conduit No. E2K307 (red division and Tray No. F2KG61, 62 (green division).
- Conduit No. E2M055 (red division), an unlabeled conduit, and conduit No. FIK793 (green division)."

1. Corrective Action Taken and Results Achieved:

NCR 7706 has been initiated and dispositioned to correct the separation violation that existed between EIK684 and FIP057. Conduit EIK684 has been moved and Quality Control has since accepted this rework.

NCR 7954 has been initiated to correct the separation violation of the remaining raceways that were identified by the inspector.

These NCRs were initiated by Bechtel QC as a result of the inspection findings. The inspector's observation that a separation violation existed between Conduit E2K307 and Cable Tray F2KG61, F2KG62 preceded Quality Control's inspection for separation requirements. The final inspection for separation prior to room turnover was instituted through QCI-E-3.0 on 11/16/76 because it was perceived that construction activities might subsequent to QC inspection of the installation, create circumstances where separation requirements might be violated.

The observation which the inspector made relative to non-Class 1E raceways being supported within less than one inch of Class 1E raceways occurred because the non-Class 1E raceways were installed after the Class 1E raceways had been inspected and accepted. Further it is recognized that other construction activities may disturb the original positioning of such

raceways. Hence, there was the initiation and implementation of the final separation inspection required by QCI-E-3.0. The effectiveness of this process leads us to the conclusion that all examples cited by the inspector would have been detected at the time of room turnover as prescribed by the Bechtel QC Program.

2. Corrective Action Taken to Avoid Further Violations

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

- a) A training session was held on 8/4/81 by the lead QCE to inform cognizant QCEs of the requirements of Drawing E-49. This training session dealt specifically with raceway separation.
- b) A training session relative to the separation requirements of Drawing E-49 will be conducted during the month of August to inform the applicable craftsforemen and field engineers. These personnel will be instructed to disseminate said information to their subordinates. The training sessions should alleviate the problem of non-class 1E raceways being installed within the one inch separation requirement of previously installed and inspected class 1E raceways.

3. Date when Full Compliance Will be Achieved:

- a) Training session for applicable craftsforemen and field engineers will be completed by 9/1/81.
- b) Training session for cognizant Quality Control personnel was held on 8/4/81 for 8856-E-49, QCI-E-1.0 and QCI-E-3.0 requirements.
- c) NCR 7954 will be closed 10/1/81.
- d) NCR 7706 was accepted by Quality Control on 6/11/81.

Full compliance will be achieved by 10/1/81 for Items a thru d above.

- "2. 10 CFR 50, Appendix B, Criterion XV, states, in part: "Measures shall be established to control materials. . .which do not conform to requirements in order to prevent their inadvertent use or installation."

Section 4.4.1 of Field Procedure FIP-G-3, on Hold Tags, states, in part: ". . .The Quality Control Engineer shall prepare a hold for QC clearance tag and affix it to the nonconforming item.

Section 4.4.2 of Field Procedure FIP-G-3 states, in part ". . .The tag shall remain on the item until a disposition has been implemented and the re-inspection accepted by QC Engineer.

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Contrary to the above, on May 21, 1981, the inspector observed in Unit 2 that solenoid valves which were nonconforming with the purchase order requirements for Q listing had been installed on Q listed safety related duct dampers (HDM-27534G, HDM-27534A, HDM-27514A and HDM-27514B) and that the non-Q valves had not been identified with Hold Tags in accordance with the procedural requirements."

The following is submitted in response:

1. Corrective Action Taken and Results Achieved:

All non-Q solenoid valves installed on dampers purchased under Q Spec M336A were not fully identified as nonconforming. Correspondence from Project Engineering in the form of a TWX was incorporated into NCRs 3787, 4069, 4070 and 4701. This TWX (F005242) informed the Field that the dampers purchased under Spec M336A were equipped with non-Q solenoid valves and were to be replaced with new Q-listed valves purchased under PO-J-69B. These NCRs, which were originally initiated to identify various receiving discrepancies, only covered a limited number of the total quantity of dampers which were equipped with non-Q solenoid valves. However, Quality Control/Field Engineering failed to recognize that the replacement of the non-Q valves as called for on the TWX necessitated that all solenoid valves on M336A purchased dampers be individually identified as nonconforming on an NCR. Consequently the four solenoid valves and dampers that the NRC inspector cited were never adequately addressed on an NCR and therefore no hold tags were ever placed.

To amend this situation, NCR 7834 has been issued to ensure that all nonconforming solenoid valves on Q-listed dampers have been identified. In addition, Field Engineering is in the process of reviewing all correspondence (EMCs and EWCs) from Project Engineering for a period encompassing the last six months. The objective of this review is to conform that similar correspondence was processed in accordance with the procedures for control of nonconforming and/or completed work. The results of this review will determine if additional investigative/corrective action is mandated.

2. Corrective Action Taken to Avoid Further Violation:

A training session was held on 8/7/81 with all lead QCEs to instruct them on the necessity of having the appropriate personnel initiate NCRs to control nonconforming conditions noted during review of related correspondence.

In addition, a memorandum has been issued to all Field Engineering personnel to inform them of the applicable procedures governing nonconformances relating to the aforementioned condition.

3. Date when Full Compliance Will be Achieved:

a) NCR 7834 will be completed by 12/1/81.

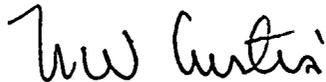
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- b) Training course for lead QCEs was held on 8/7/81 and memorandum to Field Engineering personnel was issued 8/5/81.
- c) Barring further deficiencies the review of correspondence from Project Engineering will be completed by 9/15/81.

Very truly yours,



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ARS:sab

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