



Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101 • 215 / 770-5151

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

December 31, 1981

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

SUSQUEHANNA STEAM ELECTRIC STATION  
NRC INSPECTION OF OCTOBER 20 - NOVEMBER 18, 1981  
REPORT NO. 50-387/81-25  
ER 100450 FILE 840-4  
PLA-989

---

Dear Mr. Keimig:

Reference is to your letter of November 27, 1981 which forwarded IE Inspection Report No. 50-387/81-25 and "Appendix A, Notice of Violation."

Your letter advised that PP&L was to submit within thirty (30) days of the date of the Notice, 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:

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

PSAR Appendix D, Section D.2.5 states that: "Activities affecting quality will be prescribed by documented instructions, procedures, or drawings appropriate to the circumstances."

Maintenance Test MT 81-001, Refueling Platform (Mechanical Inspection), Revision 0 of October 7, 1981, Step 3.4 requires that the refueling platform be in its normal position over the dryer/separator storage areas as a prerequisite to the test.

Contrary to the above, on November 5, 1981, Maintenance Test MT 81-001 was being conducted with the refueling platform located over the spent fuel storage pool."

8201250083 820107  
PDR ADDCK 05000387  
PDR  
Q

December 31, 1981

- 2 -

SSES PLA-989  
100450 840-4

1. Corrective Action Taken and the Results Achieved:

The incident described in the Notice, involving the mechanical inspection of the refueling platform in accordance with maintenance procedure MT-81-001, was in compliance with plant administrative controls; however, we recognize a need to strengthen the administrative controls to provide more specific instructions regarding procedure change mechanisms and the applicability of each.

Plant procedures for Susquehanna assume that the procedure will be used on an operating plant. Prior to fuel load, some provisions of these procedures (such as Radiation Work Permit requirements) simply do not apply. When these situations arise, a Work Instruction identifies the steps that are not applicable. This mechanism provides a means of utilizing procedures, written for the operations phase, during the construction/preoperational test phase. When the plant commences operation, items such as these would correctly reflect existing conditions and could not be waived by a Work Instruction.

We believe that this process, which is both controlled and documented, is an acceptable method for waiving procedural provisions which are not applicable prior to fuel loading.

2. Corrective Action Taken to Avoid Further Violations:

Plant Administrative Procedures are being revised to provide additional criteria in order to eliminate any ambiguity in the preparation and use of Work Instructions. These criteria will clarify the process for generating Work Instructions to assure that Work Instructions are not used to make unauthorized changes to approved procedures.

With these additional clarifications, personnel tasked with the responsibilities to prepare, review and approve Work Instructions will have adequate guidance to assure that this requirement is met.

3. Date When Full Compliance Will be Achieved:

The required procedural revisions will be completed by February 1, 1982.

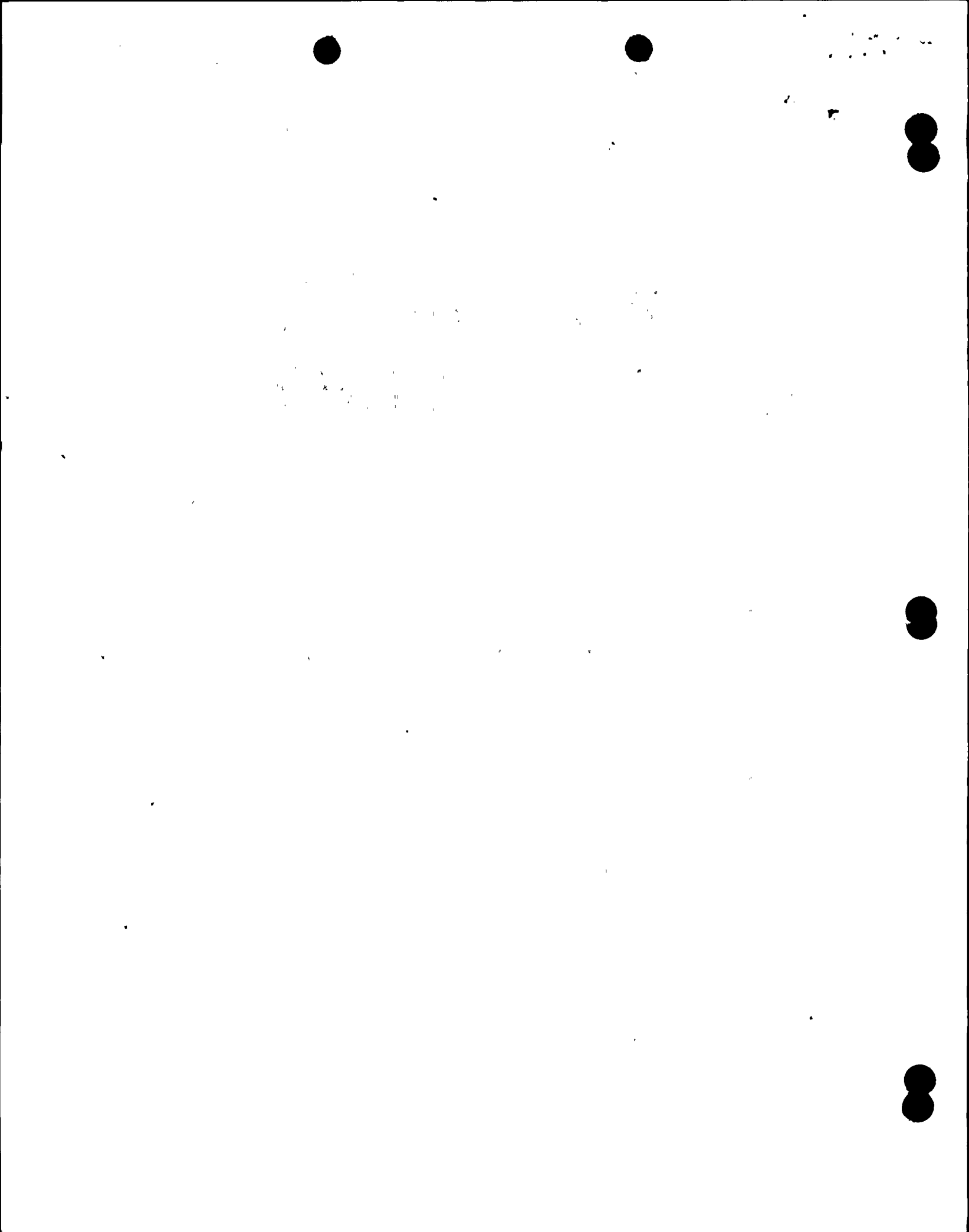
We trust the Commission will find this response acceptable.

Very truly yours,



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

CIM:jmk



December 31, 1981

- 3 -

SSES PLA-989  
100450 840-4

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 November 27, 1981 are true and correct to the best of my knowledge, information and belief.

*Norman W. Curtis*

---

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

Sworn to and subscribed  
before me this thirtieth day  
of December, 1981.

*Jean A. Smolick*

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

DEC 30 1981

REC'D I  
12 30

US NRC  
REGION I  
JAN 4 PM 1 54

