



Pennsylvania Power & Light Company

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Bruce D. Kenyon
Vice President-Nuclear Operations
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DEC 5 1984

Mr. Thomas T. Martin, Director
Division of Engineering and Technical Programs
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

SUSQUEHANNA STEAM ELECTRIC STATION
NRC INSPECTION REPORTS 50-387/84-21
AND 50-388/84-26 (ADDITIONAL RESPONSE SUBMITTAL)
ER 100450 FILE 841-04
PLA-2303

Docket Nos. 50-387
50-388

Dear Mr. Martin:

This letter provides PP&L's response to your letter of July 18, 1984, which forwarded NRC Region I Combined Inspection Reports 50-387/84-21 and 50-388/84-26, concerning the actions taken or planned to upgrade the dispositioning of nonconformance reports.

Your letter advised that PP&L was to submit a written reply. We trust that the Commission will find the attached response acceptable.

Very truly yours,

B. D. Kenyon
Vice President-Nuclear Operations

Attachments

cc: Mr. R. H. Jacobs - NRC Senior Resident Inspector

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ADDITIONAL RESPONSE TO VIOLATION

Violation: (387/83-31-04 and 388/83-31-04)

10 CFR Part 50, Appendix B, Criterion XV, states: "Measures shall be established to control materials, parts, or components which do not conform to requirements in order to prevent their inadvertent use or installation. These measures shall include, as appropriate, procedures for identification, documentation, segregation, disposition, and notification to affected organizations. Nonconforming items shall be reviewed and accepted, rejected, repaired or reworked in accordance with documented procedures."

Licensee's procedure NDI-QA-8.1.5 (Revision 1), paragraph 6.2.5, for implementing this criterion for Non-Conformance Reports (NCR's) states: "Disposition of NCR's by the responsible/dispositioning organization shall be provided within 30 days although circumstances may dictate that more immediate action is required. If more than 30 days are required to disposition an NCR, the dispositioning organization shall provide the Responsible Quality Control Supervisor, and other involved groups with a status report that details the action being taken, any interim controls and the date when the disposition will be completed."

Contrary to this on December 2, 1983, the dispositioning organizations for NCR 83-779 and NCR 83-1190, issued respectively on August 11, 1983, and October 21, 1983, provided neither the required dispositions within 30 days nor the status reports required when more than 30 days are needed to disposition the NCR's. In addition, 157 similar examples were also found.

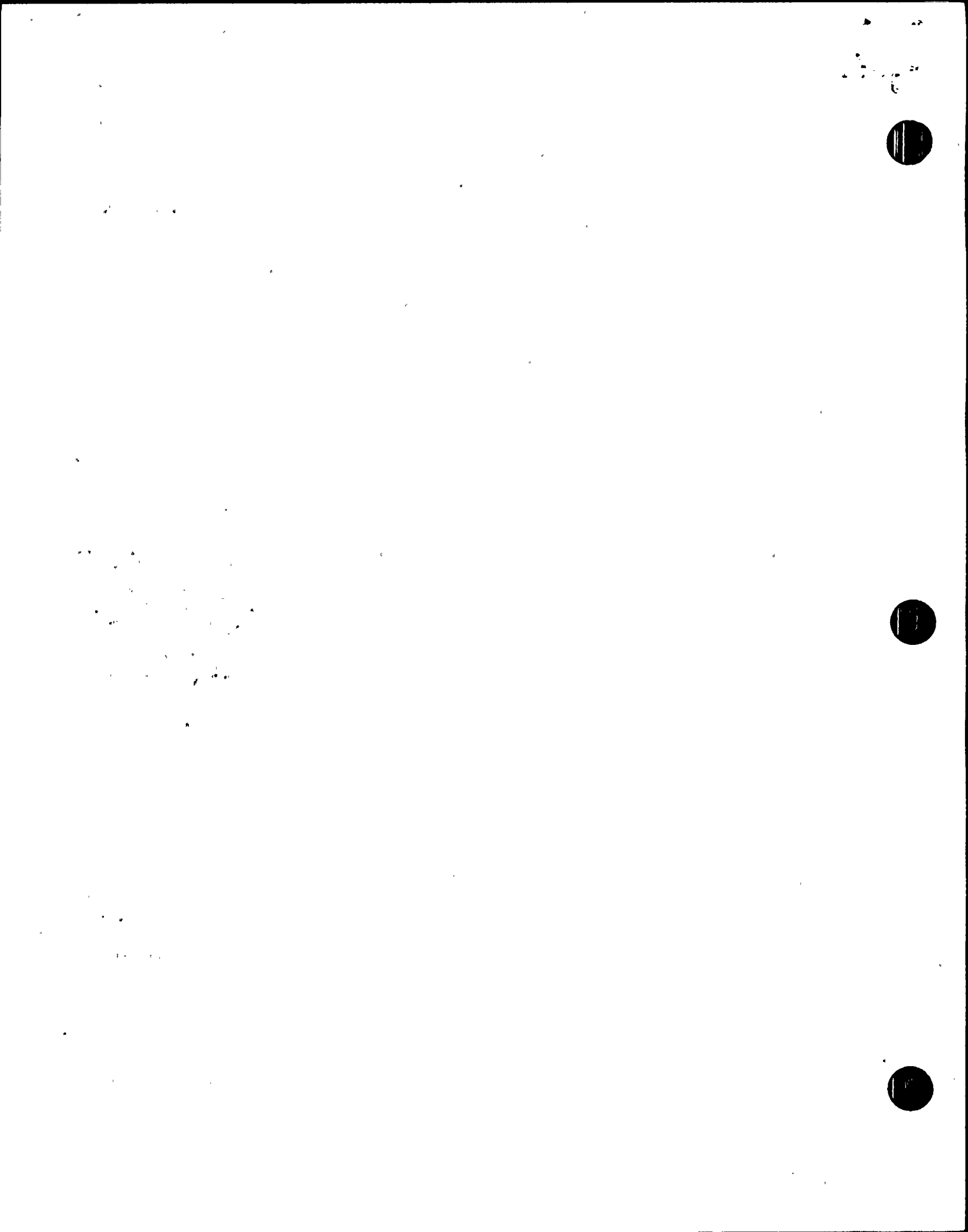
(Excerpts from July 18, 1984 letter)

With regard to the item in our January 27, 1984 letter (Violation), it appears that the stated corrective actions were not totally effective since this item has not been fully corrected. Three Nonconformance Reports issued to Nuclear Plant Engineering (NPE) in 1982 and 1983 remain unresolved, in that NPE has not provided a written response.

Additional Response:

(1) Corrective steps which have been taken and the results achieved:

- a) The Nuclear Department Instruction (NDI-QA-8.1.5 (Rev. 2)) titled "Nonconformance Control and Processing", has been revised to allow greater scheduling flexibility for the NCR dispositioning process. "Dispositioning" is the identification of actions which must be implemented to close the NCR.
- b) A Nuclear Department Instruction (NDI-QA-8.1.9 (Rev. 0)) titled "Receipt Nonconformance Control and Processing" has been issued. This instruction controls nonconformances identified during quality assurance procurement receipt inspections. These are now handled as a separate category of nonconformances.
- c) Outstanding NCR's issued prior to the effective date of NDI-QA-8.1.5/Rev. 2 (July 30, 1984) have been dispositioned or the disposition has been appropriately deferred.



- d) The Plant Staff supporting procedures controlling nonconformance reports have been revised to reflect the current revisions of the Nuclear Department instructions noted in a and b.

(2) Corrective steps which will be taken to avoid further violations:

The Nuclear Plant Engineering supporting procedures controlling nonconformance reports will be revised to reflect the current revisions of the nuclear department instructions noted in (1)a and b. These revisions will be issued by January 15, 1985.

(3) Date of Full Compliance

As a result of the above actions PP&L is in full compliance. Procedures to implement the revised NCR dispositioning process will be revised by January 15, 1985.

11/11/11

