



Pennsylvania Power & Light Company

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Bruce D. Kenyon
Vice President-Nuclear Operations
215/770-7502

MAR 27 1985

Mr. Harry B. Kister, Chief
Projects Branch No. 1
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

SUSQUEHANNA STEAM ELECTRIC STATION
NRC INSPECTION REPORTS 50-387/84-38
AND 50-388/84-47
ER 100450 FILE 841-04
PLA-2435

Docket Nos. 50-387
50-388

Dear Mr. Kister:

This letter provides PP&L's response to your letter of February 27, 1985, which forwarded NRC Region I Combined Inspection Reports 50-387/84-38 and 50-388/84-47 with Appendix A, Notice of Violation.

Your Notice advised that PP&L was to submit a written reply within thirty (30) days of the date of the letter. 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
Ms. M. J. Campagnone - NRC (NRR Project Manager)

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RESPONSE TO NOTICE OF VIOLATION

A. Violation (387/84-38-02)

Technical Specification 6.8.1 requires that procedures for implementation of the fire protection program be established, implemented and maintained. Administrative Directive AD-QA-140, Revision 2, "Use and Storage of Combustible/Hazardous Materials", requires that compressed gas cylinders shall not be stored in the plant except in properly installed racks designed for that purpose. Additionally, FSAR Section 9.5.1.1.11 states that, with the exception of the nitrogen cylinders for the containment instrument gas system and the hydrogen and oxygen analyzer system, there is no permanent gas storage inside structures housing safety-related equipment.

Contrary to the above, on November 27, 1984, approximately 15 compressed gas cylinders (i.e., Hydrogen, Oxygen and Nitrogen) were found stored in an unauthorized location, next to and physically tied to the safety-related outboard Main Steam Isolation Valve Leakage Control System (MSIVLCS) piping on the 719 foot elevation of the Unit 1 Reactor Building.

Response:

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

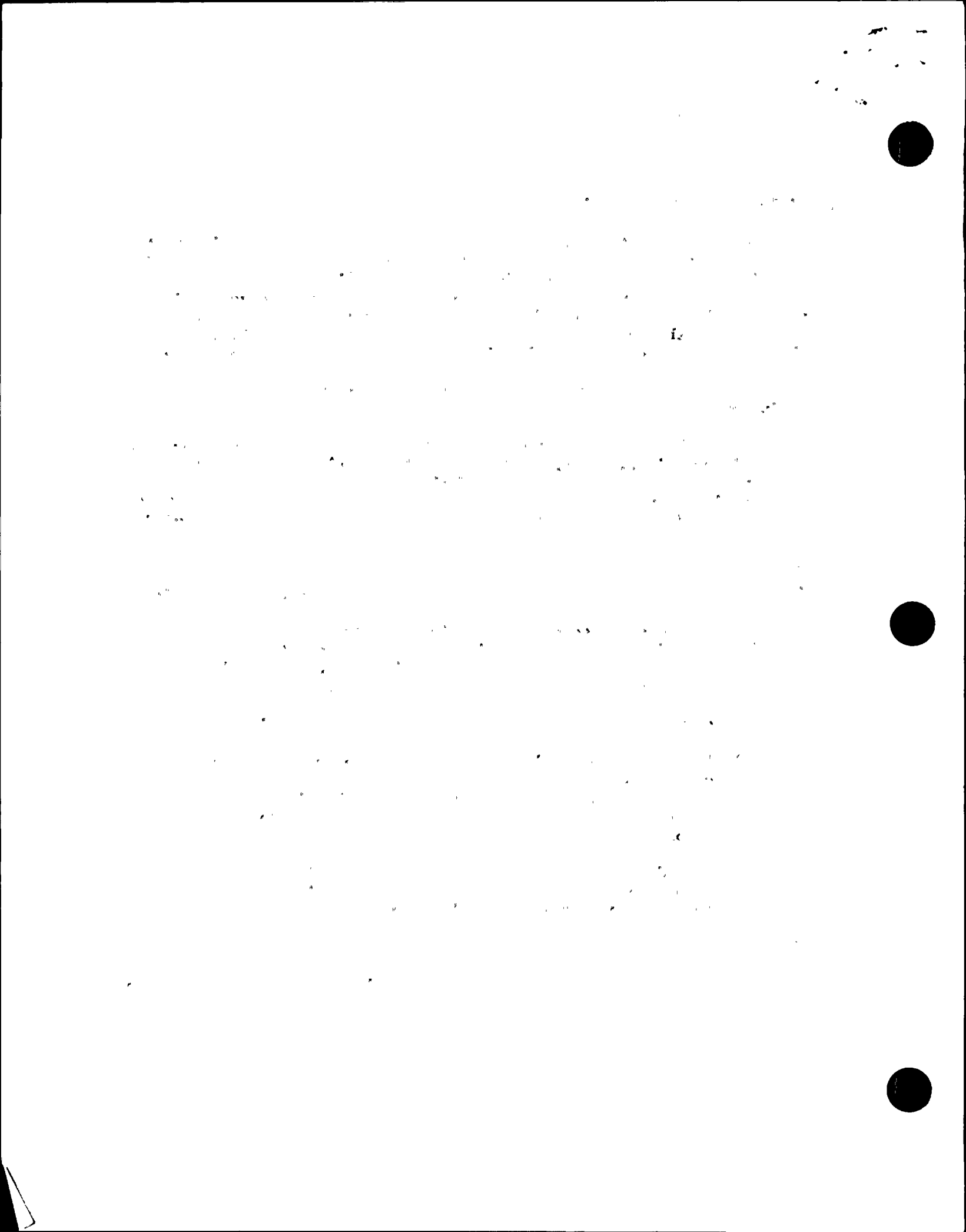
Storage racks for compressed gas bottles were fabricated and installed in designated locations for the transient storage and/or staging of reserve bottles. This results in an acceptable level of control of compressed gas bottles within the plant.

(2) Corrective steps being taken to avoid further violations:

- (a) As part of the daily plant walkdown, an inspection for compressed gas bottle storage problems is conducted. Additionally, the monthly Duty Team's cleanliness walkdown includes an inspection for compressed gas bottle storage problems.
- (b) In order to reinforce the above and emphasize the need for proper compressed gas bottle control, an "All Station Personnel" memo has been issued from the Superintendent of Plant.

(3) Date of Full Compliance:

Based on the actions taken in (1) above, PP&L is in full compliance.



B. Violation (387/84-38-04)

Technical Specification 6.8.1 requires that procedures for implementation of the fire protection program be established, implemented and maintained. Administrative Directive AD-QA-145, "Fire Brigade", Revision 1, dated February 29, 1984, requires successful completion of the Initial Fire Brigade Training Course as a prerequisite to initial assignment to the Fire Brigade.

Contrary to the above, as of November 28, 1984, four fire brigade members had not completed the Initial Fire Brigade Training Course and this training requirement has not been waived by the licensee for these individuals.

Response:

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

Fire Brigade members training records were reviewed and four brigade members were immediately removed from the brigade. Three members have subsequently received the Initial Fire Brigade Training Course; the other member was determined to have equivalent training and/or experience.

(2) Corrective steps taken to avoid further violations:

Plant personnel responsible for Fire Brigade training and assignment have reviewed, and fully understand the administrative requirements for Fire Brigade membership.

(3) Date of Full Compliance:

Based on the actions taken in (1) above, PP&L is in full compliance.

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