PP&L Pennsylvania Power & Light Company
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Harold W. Keiser
Vice President-Nuclear Operations
215/770-7502

SEP 13 1985

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

SUSQUEHANNA STEAM ELECTRIC STATION
NRC INSPECTION REPORTS 50-387/85-21
AND 50-388/85-17
ER 100450 FILE 841-04 Docket Nos. 50-387
PLA-2532 50-388

Dear Mr. Kister:

This letter provides PP&L's response to your letter of August 16, 1985, which forwarded NRC Region I Combined Inspection Reports 50-387/85-21 and 50-388/85-17 with Appendix A, Notice of Violation.

Your Notice advised that PP&L was to submit a written reply to the violation within thirty (30) days of the date of the letter. We trust that the Commission will find the attached response acceptable.

Your letter also requested PP&L provide a corrective action schedule for the Unit 1 RCIC topaz inverter blown fuse problem. This schedule, to implement a change in the circuitry to assure a reliable power source to the inverter, is unnecessary since the referenced action has been completed. This modification makes the Unit 1 RCIC topaz inverter circuitry similar to that of Unit 2 which has not experienced this type of problem.

PP&L has developed a comprehensive program to manage its resources toward completion of significant modifications and correction of deficiencies at Susquehanna SES. Items are prioritized based on a number of inputs which include safety and regulatory significance among many other factors. This is a dynamic process which is continuously subject to reevaluation as new items are added. This program emphasizes and supports the resolution of significant safety and regulatory issues.

We have operated for some time using this program to manage plant modifications. We believe we have achieved our goals; however, we are not satisfied with the overall efficiency of the program. As with all management systems, we expect to periodically reassess the adequacy of this program and make changes to improve efficiency.

IE01

PP&L has investigated the allegation discussed in your letter, and has determined it has no impact on our response (PLA-2453/dated 6/24/85) to unresolved item 387/85-02-01, related to drawing deficiencies. The accuracy of all plant drawings continues to be of paramount importance to PP&L. When drawing errors are discovered they are aggressively pursued and corrected within the framework of Nuclear Department programs & procedures with the intention of creating an "error free" drawing system at Susquehanna SES.

Very truly yours,

H. W. Keiser
Vice President-Nuclear Operations

Attachments

cc: Mr. R. H. Jacobs - NRC Senior Resident Inspector
Ms. M. J. Campagnone - NRC (NRR Project Manager)

RESPONSE TO NOTICE OF VIOLATION

Violation (388/85-17-01)

Technical Specification 6.8.1 requires that written procedures be established, implemented and maintained covering applicable procedures in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33, Appendix A requires procedures for equipment control. Administrative Procedure AD-QA-302, "System Status and Equipment Control", Revision 3 dated February 22, 1985 requires that manual containment isolation valves which are required to be closed, including valves for local leak rate testing (LLRT), be locked closed.

Contrary to the above, as of July 9, 1985, manual valve 249F055, a containment isolation valve which was aligned in accordance with check off list COL-OP-250-001-2 for the Reactor Core Isolation Cooling System, was closed, but not locked.

Response:

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

Immediately upon notification of the incorrect status, the RCIC manual containment isolation valve (249F055) was locked in the closed position (July 11, 1985).

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

a) A comprehensive review and analysis was conducted to identify containment boundary valves. These valves are being compared to their respective COL's to ensure compliance to AD-QA-302.

b) Drawings (P&ID's) will be revised to clearly identify containment boundary valves.

(3) Date of full compliance:

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