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Harold W. Keiser
Vice President-Nuclear Operations
215/770-7502

MAY 0 5 1986

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 50-387/86-02
AND 50-388/86-01 Docket Nos. 50-387
PLA-2634 FILE R41-1C,R41-2 50-388

Dear Mr. Kister:

This letter provides PP&L's response to your letter of April 4, 1986 which forwarded NRC Region I Combined Inspection Reports 50-387/86-02 and 50-388/86-01 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,

H. W. Keiser
Vice President-Nuclear Operations

Attachment

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

IE01

RESPONSE TO NOTICE OF VIOLATION

Violation A (387/86-02 and 388/86-01)

10 CFR 50.59 states that the licensee may make changes in the facility as described in the safety analysis report without prior Commission approval, unless the proposed change involves an unreviewed safety question. The licensee is required to maintain records of changes in the facility, and the records shall include a written safety evaluation which provides the basis for the determination that the change does not involve an unreviewed safety question.

Contrary to the above, as of March 11, 1986, the design of the seismically qualified panels for the Reactor Coolant Pressure Boundary Leak Detection System and Containment Hydrogen/Oxygen Monitoring System, which are described in the FSAR, was changed, in that the panel doors had been opened and/or removed, and the modification was not subjected to a safety evaluation in accordance with the requirement of 10 CFR 50.59.

Response:

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

The Atmospheric Analyzer Panel doors (both units) and the Unit 1 Reactor Coolant Pressure Boundary Leak Detection Panel door were reinstalled/repaired and are closed.

The Unit 2 Reactor Coolant Pressure Boundary Leak Detection Panel door is removed; however, an engineering evaluation concluded that this condition does not degrade the seismic qualification of the panel. This door will be reinstalled to maintain continuity between units.

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

A plant memorandum associating panel door integrity with seismic qualification was issued to plant supervision. This memorandum also indicates an engineering evaluation is necessary before a panel door can remain open.

(3) Date of full compliance:

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

Violation B (387/86-02)

10 CFR 50 Appendix B, Criterion XV, states that measures shall be established to control materials which do not conform to requirements in order to prevent their inadvertent use or installation. Administrative procedure AD-QA-200, Material Control Activities, and Material Section Instruction MC-OI-011, Shelf Life Tracking System, require that Quality material be tagged with a SSES Material Identification Tag (FORM 2778G), which includes the shelf life expiration date, and to track items identified with shelf life to prevent their inadvertent use.

Contrary to the above, on April 19, 1985, a Standby Liquid Control System primer assembly was installed in the system which had exceeded the vendor recommended shelf life of five years in August 1984. The expiration date was not marked on the Material Identification Tag, and the valve remained in the system until February 19, 1986.

Response:

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

All primers in stock were inspected and found to be properly tagged to include the shelf life expiration date on the tag. No other primers were identified with expired shelf life dates. The primer that was issued without the shelf life date on the tag was an exception for shelf life tracking of stock primers.

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

a. On-the-job training has been conducted with Warehouse personnel addressing shelf life program commitments and requirements.

b. The applicable Surveillance Procedure was revised to assure that adequate shelf life (36 months) remains whenever new primers are requested for installation.

c. Special notes were incorporated into the Material Management System concerning the shelf life of primers and batch qualifications of them.

(3) Date of full compliance:

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

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