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Harold W. Keiser
Vice President-Nuclear Operations
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JUN 0 5 1986

Mr. Richard W. Starostecki
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 REPORT 50-387/86-06
AND 50-388/86-04
PLA-2656 FILE R41-1C,R41-2

Docket No. 50-387
50-388

Dear Mr. Starostecki:

This letter provides PP&L's response to your letter of May 7, 1986 which forwarded NRC Region I Inspection Report 50-387/86-06; 50-388/86-04 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)

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VIOLATION 1 (387/86-06-04)

Unit 1 Technical Specification 6.8.1.a requires establishment and implementation of procedures specified in Appendix "A" of Regulatory Guide 1.33, Revision 2, including equipment control procedures. Administrative Procedure AD-QA-306, Revision 3, System Equipment Release, requires shift supervision to control equipment release by review of the Equipment Release Form for completeness, review of plant status to determine if the work can be performed, and release of equipment for work with associated Limiting Conditions for Operations (LCO's) identified in the daily LCO log.

Contrary to the above, on March 27, 1986, the licensee did not properly control work on the reactor building recirculation plenum, in that, the Limiting Condition for Operation action statement was not entered for secondary containment integrity, the instructions on the Equipment Release Form were not complete, and the instructions were not followed by the work group.

RESPONSE:

1) Corrective steps taken and results achieved:

Upon notification, that both the supply and discharge recirculation access hatches were open, the operations shift supervisor immediately halted fuel movement. The maintenance crew was directed to stop work on the recirculation plenum and reinstall the personnel access hatches. This action reestablished Secondary Containment Integrity.

Prior to recommencing the preventive maintenance activities in the recirculation plenum a new work authorization was prepared which included detailed written instructions to control the removal and installation of the plenum access hatches. A new Equipment Release Form (ERF) was also prepared. This ERF contained complete and precise information as to which plenum hatch would be open and how the opening and closing of the hatch would be controlled. These precautions insured that Secondary Containment Integrity requirements would not be violated.

2) Corrective steps to be taken to prevent recurrence:

Future work inside the recirculation plenum will be controlled by similar specific instruction on how to gain and secure access into the plenum to ensure Secondary Containment.

3) Date when full compliance will be achieved:

PP&L is now in full compliance.

VIOLATION 2 (388/86-04-02)

Unit 2 Technical Specification 6.8.1.a and Appendix "A" of Regulatory Guide 1.33, Revision 2, requires the establishment and implementation of equipment control procedures. Administrative Procedure AD-QA-302, Revision 4, System Status Equipment Control, requires root valves (first valves off process line) that supply safety-related instrumentation be locked open.

Contrary to the above, as of April 17, 1986, the root valves 247F155A,B,C and D that supply the safety-related scram discharge volume level transmitters were not locked open. The valves were open, in accordance with the system checkoff list.

RESPONSE:

1) Corrective steps taken and the results achieved:

A procedure change was prepared and approved to correct the check-off list to indicate "Locked Open" as the normal position for valves 247F155 A,B,C and D.

Locking devices were installed on valves 247F155A,B,C and D.

An Interim Drawing Change Notice was prepared to correctly show the subject valves as normally being "Locked Open".

2) Corrective steps to be taken to prevent recurrence:

The Operation's Supervisor will reinforce the requirements of AD-QA-302 to those individuals assigned to procedure preparation.

3) Date by which full compliance will be achieved:

PP&L is now in full compliance.

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