PP&L Pennsylvania Power & Light Company
Two North Ninth Street • Allentown, PA 18101 • 215 / 770-5151

SEP 12 1986

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

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

SUSQUEHANNA STEAM ELECTRIC STATION
NRC INSPECTION REPORTS 50-387/86-10
AND 50-388/86-10
PLA-2715 FILE R41-1C,R41-2

Docket Nos. 50-387
and 50-388

Dear Mr. Martin:

This letter provides PP&L's response to your letter of August 14, 1986 which forwarded NRC Region I Combined Inspection Reports 50-387/86-10 and 50-388/86-10 with Appendix A, Notice of Deviation.

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 Keiser

H. W. Keiser
Vice President-Nuclear Operations

Attachment

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

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RESPONSE TO NOTICE OF DEVIATION

Deviation: (387/86-10-07, 388/86-10-07)

The FSAR Section 2.3.3 states that the instrument accuracy for the primary meteorological monitors will be the following:

- wind speed ±1% of full scale or ±0.15 mph;
- wind direction ±2° based on 540° range; and,
- delta temperature ±0.15°/50m.

Contrary to the above, the measurement accuracy for wind speed, wind direction and an estimate of atmospheric stability are not adhered to in the meteorological monitoring program in that the calibration procedures used for these instruments, SI-099-313 to SI-099-318, have the following tolerance limits:

- wind speed ±5.6/±2.8 mph
- wind direction ±19.4/±9.7 degrees
- delta temperature ±1.6/±0.8° F (±0.9/±0.44° C)

for the "as found" and "as left" accuracy specifications, respectively.

Further, the calibration procedure for delta-temperature instrumentation doesn't include an actual sensor calibration (i.e., water bath to test accuracy of thermistor). Only an electronics loop calibration is performed, which assumes no instrument measurement error.

Response:

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

The plant computer system sensor compression limits for meteorological data have been revised. These revisions improve and upgrade the collection of actual meteorological data.

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

a. PP&L will modify the existing meteorological system on the primary and backup meteorological towers to meet the accuracy criteria established in the FSAR. Short term corrective actions will be to decrease the ranges of the delta temperature and wind speed sensors in order to gain accuracy.

b. Meteorological temperature sensors at Susquehanna are not presently "calibrated". They are purchased to a specification which provides for an output proportional to temperature. The devices are checked to insure they are operating properly, i.e. not open or grounded, and placed in service. Historically, multiple temperature sensors installed at Susquehanna fail catastrophically not incrementally. Therefore, any temperature sensor problem will be immediately detected.

However, meteorological system calibration practices for wind speed, wind direction and delta temperature will be reviewed to assure

instrument and channel integrity. Present calibration practice will be reviewed against intra-company (PP&L) practice, current industry practice and other regulatory guidelines/practices, then revised as necessary.

(3) Date of full compliance:

a. The exact date for installation of new meteorological instrumentation cannot be established at this time due to the modification process. However, the new instrumentation is expected to be operational for the second semiannual calibration scheduled in 1987.

Delta-temperature and wind speed sensor ranges will be decreased by December 31, 1986.

b. Meteorological system calibration practices will be reviewed and revised prior to operation of the new meteorological instrumentation.