



Pennsylvania Power & Light Company

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

DEC 10 1986

Mr. Stewart D. Ebnetter, Director  
Division of Reactor Safety  
U.S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

SUSQUEHANNA STEAM ELECTRIC STATION  
NRC INSPECTION REPORTS 50-387/86-21  
AND 50-388/86-22  
PLA-2759 FILE R41-1C,R41-2

Docket Nos. 50-387  
50-388

Dear Mr. Ebnetter:

This letter provides PP&L's response to your letter of October 31, 1986 which forwarded NRC Region I Combined Inspection Reports 50-387/86-21 and 50-388/86-22 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. However, as discussed with Mr. J. P. Durr of NRC Region I on November 26, 1986, PP&L has been authorized to delay the response until December 10, 1986. We trust that the Commission will find the attached response acceptable.

If you have any further questions, please contact R. D. Kichline (215-770-7860).

Very truly yours,

H. W. Keiser  
Vice President-Nuclear Operations

Attachment

cc: Mr. L. R. Plisco - NRC Senior Resident Inspector  
Mr. M. C. Thadani - NRC (NRR Project Manager)

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## RESPONSE TO NOTICE OF VIOLATION

PP&L contends that paragraph 4.2.15 of Specification (procedure) E-49 sheet 20, rev. 19, "Conduit & Cable Tray Notes & Details" was not violated with respect to the RCIC motor operated valve HV-E51-2F008 and therefore refutes the Notice of Violation. Conduit sealing became an escalated concern at the Susquehanna SES in 1981 after Flaxoap cable lubricant was found to migrate through conduit to associated electrical equipment. Conduit sealing is normally required on long cable runs where dust, moisture and/or cable lubricant in the conduit is a concern. Sealing is not necessary on shorter conduit runs where the conditions which require sealing are not present. Paragraph 4.2.15 of Specification E-49 exempts sealing on certain short conduit runs which meet other specified conditions. Since the conduit runs from the RCIC MOV (HV-E51-2F008) meet the exemption criteria identified in Specification E-49, no violation has occurred.

The "Flaxoap migration" issue was reported to the NRC under 10CFR50.55(e) on August 5, 1981. A final report dated January 13, 1982 (PLA-1000) stated in part that "Bechtel Drawing E-49... has been revised to include the appropriate conduit sealing requirements." The NRC closed the 50.55(e) action for Unit 1 in Inspection Report 387/82-03 and for Unit 2 in Inspection Report 388/83-21. PP&L believes the NRC closure of this item adequately indicates acceptance of construction activities associated with conduit sealing.

Paragraph 4.2.15 of Specification E-49 does state that "Conduits -- located above or below -- shall be effectively sealed against dust, moisture and Flaxoap with sealant material PR-895 (formerly PR-615) or PR-855 -- or equal"; however, it also specifically excludes "Flex, conduit and/or nipples between TB's (terminal boxes)/JB's (junction boxes) and local devices." (Note 2.b to this paragraph). The conduits from RCIC MOV (#HV-E51-2F008) run between the MOV and local junction boxes. Therefore, the conditions of note 2.b to paragraph 4.2.15 of Specification E-49 are applicable and sealing of the conduit at the MOV is not required.

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