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 50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylv 05000388  
 AUTH. NAME AUTHOR AFFILIATION  
 KEISER, H. W. Pennsylvania Power & Light Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
 WIGGINS, J. T. Region 1, Ofc of the Director

SUBJECT: Responds to NRC 871118 ltr re violation noted in Insp Repts  
 50-387/87-16 & 50-388/87-16. Corrective actions: reactor bldg  
 HVAC operating procedure revised to require confirmation,  
 verification & tagging of dampers. Training underway.

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Pennsylvania Power & Light Company

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DEC 13, 1987

Harold W. Keiser  
Vice President-Nuclear Operations  
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Mr. James T. Wiggins  
Chief, Project Branch No. 3  
Division of Reactor Projects  
U.S. Nuclear Regulatory Commission  
Region I  
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SUSQUEHANNA STEAM ELECTRIC STATION  
NRC INSPECTION REPORTS 50-387/87-16  
AND 50-388/87-16  
PLA-2945 FILE R41-1C, R41-2

Docket Nos. 50-387  
and 50-388

Dear Mr. Wiggins:

This letter provides PP&L's response to your letter of November 18, 1987 which forwarded NRC Region I Combined Inspection Reports 50-387/87-16 and 50-388/87-16 with Appendix A, Notice of Violation.

The 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: NRC Document Control Desk (original)  
NRC Region I  
Mr. J. R. Stair - NRC Resident Inspector  
Mr. M. C. Thadani, NRC Project Manager

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## RESPONSE TO NOTICE OF VIOLATION

### Violation (387/87-16-02)

Technical Specification 3.6.5.1 requires that secondary containment integrity be maintained while in Operational Condition 1. In accordance with Technical Specification 1.37 and 4.6.5.1.b.3, included in the requirement for secondary containment integrity is that all secondary containment penetrations required to be closed during accident conditions, including penetrations between zones, are either closed or capable of being closed by an automatic isolation system.

Contrary to the above, during the period August 31 - September 4, 1987, while in Operational Condition 1, secondary containment penetrations (manual dampers XD-17513 and XD-17514) between Zones I and III, required to be closed during accident conditions, were not closed or capable of being closed by an automatic isolation system.

### Response:

#### 1) Reason for the violation:

This event occurred as a result of inadequate communication. An Equipment Release Form (ERF) associated with the evolution to remove the Unit 1 719' elevation removable wall to the Railroad Access Bay was submitted to the operations section's for their approval. The ERF also requested the Railroad Access Bay be aligned to Zone I. The wording in the ERF was misleading in that the Railroad Access Bay can only be aligned to or isolated from Zone III HVAC via the two isolation dampers. In addition, verbal communication between the Unit Supervisor and the Plant Control Operator failed to clearly detail the planned evolution, i.e., isolation of the Railroad Access Bay in accordance with the operating procedure, for the purpose of removing the 719' elevation removable wall.

#### 2) Corrective steps which have been taken and the results achieved:

The Unit 1 719' elevation removable wall was reinstalled on September 3, 1987. Following installation Zones I and III were no longer cross-tied.

The Reactor Building HVAC operating procedure was revised to require step-by-step confirmation, verification and administrative tagging of Railroad Access Bay isolation dampers during any Railroad Access Bay evolutions. Additionally, the affected work planning group was instructed on the wording to be used when requesting wall removal between the Reactor Building HVAC Zones and the Railroad Access Bay. These actions ensure a more positive control over the evolutions.

3) Corrective steps to be taken to avoid further violations:

Training, concerning the operating procedure revisions and the importance of good communications, is being conducted for all licensed and non-licensed operators.

4) Date of full compliance:

Based on the actions taken in (2) above, PP&L is in full compliance.