



Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101 • 215 / 770-5151

Bruce D. Kenyon
Vice President-Nuclear Operations
215/770-7502

APR 1 1985

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 REPORT 50-388/85-02
ER 100508 FILE 841-04
PLA-2439

Docket No. 50-388

Dear Mr. Ebnetter:

This letter provides PP&L's response to your letter of March 4, 1985, which forwarded NRC Region I Inspection Report 50-388/85-02 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,


B. D. Kenyon
Vice President-Nuclear Operations

Attachments

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

8505150286

JE-01



RESPONSE TO NOTICE OF VIOLATION

A. Violation (388/85-02-01)

License NPF-22, Item 2.c.2.5 requires in part, "conducting the post-fuel-loading initial test program as described in Section 14 of the Final Safety Analysis Report without deviating from the initial test program administrative procedures." The Pennsylvania Power and Light Company administrative procedure governing the post fuel loading initial test program, AD-TY-460, requires, in Section 6.5.17, "preparation of a test exception report whenever test results fail to satisfy acceptance criterion," "and, in Section 6.1.15," analysis of oscillatory behavior whenever more than two positive polarity peaks exist utilizing form AD-TY-460-5."

Contrary to the above, as of January 10, 1985, two examples of failure to follow the administrative procedure for adequate analysis of test results for the post fuel loading initial test program were identified:

1. ST-8.4-6 implemented on October 7, 1984 did not analyze for the oscillatory behavior of RHR level and pressure in the time period of 1560-1680 seconds, did not complete form AD-TY-460-5 as required in step 8.4.7.1, did not identify in Section 8.4.7.2 that such oscillations would not meet acceptance criteria and did not prepare a test exception report.
2. ST-11.3-4 implemented on September 29, 1984 did not identify in Step 11.3.6 that LPRMs 08-33 and 32-17 were bypassed, did not indicate that the acceptance criteria analysis in step 11.3.6 could not be satisfied and did not prepare a test exception report.

Response:

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

- a. A test exception report for ST 8.4-6 (No. 185) was prepared, approved and closed in accordance with the Unit 2 Startup Test Program Administrative Procedures.
- b. A test exception report for ST 11.3-4 (No. 186) was prepared, approved and closed in accordance with the Unit 2 Startup Test Program Administrative Procedures.

(2) Corrective steps to avoid further violations:

The Unit 2 Startup Test Program has been completed; therefore, no action is required to prevent further violations.

(3) Date of Full Compliance:

Based on the actions taken in (1) above, PP&L is in full compliance.





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THE UNIVERSITY OF CHICAGO
DEPARTMENT OF CHEMISTRY
5800 S. UNIVERSITY AVENUE
CHICAGO, ILLINOIS 60637

RECEIVED
JAN 10 1964

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TO THE DIRECTOR, NATIONAL BUREAU OF STANDARDS
WASHINGTON, D. C. 20535

Yours very truly,
[Signature]

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