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

MAY 30 1985

Mr. Stewart D. Ebneter
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 50-387/85-06
AND 50-388/85-06
ER 100450 FILE 841-04 Docket Nos. 50-387
PLA-2483 50-388

Dear Mr. Ebneter:

This letter provides PP&L's response to your letter of April 29, 1985, which forwarded NRC Region I Combined Inspection Reports 50-387/85-06 and 50-388/85-06 with Appendix A, Notice of Violation and Appendix B, 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,

for B. D. Kenyon
Vice President-Nuclear Operations

Attachments

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

IE01

RESPONSE TO NOTICE OF VIOLATION

A. Violation (50-387/85-06-10 and 50-388/85-06-10)

The Facility Operating Licenses for Units 1 and 2, dated September 28, 1983 and March 23, 1984 respectively, require that the licensee shall fully implement and maintain all provisions of the approved fire protection program contained in the licensee's Fire Protection Review Report (FPRR), Revision 2. The provisions include the fire dampers installed in all fire barriers.

Licensee's fire protection program implementing procedure NDI-QA-15.3.1, Fire Protection Program, Revision 1, Section 6.3, specifies that fire protection tests shall encompass the applicable NFPA requirements and in Section 6.4 of the same procedure, specifies that plant equipment shall be tested on regularly scheduled basis. NFPA 90A requires that fire dampers shall be functionally tested every 12 months.

Contrary to the above, as of February 15, 1985, the licensee did not maintain certain provisions of the FPRR in that the fire dampers, installed in the walls the licensee committed in the FPRR to maintain as fire barriers (for example, Lube Oil Reservoir Rooms in Units 1 and 2), were not functionally tested.

Response

PP&L initiated a review of the fire protection implementing procedure and commitments to determine if PP&L is in fact in violation. PP&L has made the following conclusions:

(a) Section 6.3 to NDI-QA-15.3.1 (Rev. 1), which requires Fire Protection Testing to encompass NFPA requirements, only applies to acceptance testing.

(b) Section 6.4 to NDI-QA-15.3.1, which requires testing on a regularly scheduled basis, does not reference NFPA. It only indicates that fire protection for safety related equipment is subject to the testing and surveillance requirements of SSES Technical Specifications.

(c) NFPA-90A is the standard for the Installation of Air Conditioning and Ventilating Systems. Testing is covered in Section B-7 of Appendix B of this standard. A specific note indicates that Appendix B is not part of the NFPA document, but it is included for information purposes only. In addition, since Section B-7 utilized the word "should" rather than "shall", it is clear that NFPA intended this section to be optional.

[illegible]

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RESPONSE TO NOTICE OF DEVIATION

Deviation (50-387/85-06-06 and 50-388/85-06-06)

By letter dated March 26, 1981, the licensee committed to perform a duct failure analysis for fire damper installation in a drywall assembly, to determine if additional fire proofing and/or supports will be required. This was the basis for the approval of the fire damper installation in a drywall assembly, as documented in Supplemented 1 to Safety Evaluation Report, dated June 1981, Section 9.5.2.2.

Contrary to the above, as of February 15, 1985, the licensee had not performed the duct failure analysis.

Response:

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

The individuals who performed the calculation within Bechtel Power Corporation have been contacted. A search of the records of the calculations prepared by Bechtel has been initiated. As of May 28, 1985, the record copy of the calculation has not been found.

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

A duct failure analysis will be provided. This will either be the original calculation or the calculation will be redone.

(3) Date of Full Compliance:

PP&L will achieve full compliance by June 28, 1985.

In conclusion, fire dampers are subject to the surveillance requirements of the Technical Specifications and are not subject to Section B-7 of Appendix B to NFPA 90A.

PP&L has concluded that it is not in violation with respect to fire dampers.

B. Violation (50-387/85-06-11)

The Facility Operating License for Unit 1, dated September 28, 1983 requires that the licensee shall maintain all provisions of the approved fire protection program contained in the licensee's Fire Protection Review Report (FPRR), Revision 2. The provisions include the fire doors installed in all fire barrier walls.

Contrary to the above, as of February 15, 1985, the licensee did not maintain certain provisions of the FPRR in that several fire doors in Unit 1, installed in walls the licensee committed in the FPRR to maintain as fire barriers, were not maintained as fire barriers and were found non-functional. The doors were considered non-functional, because they were either held open or would not lock shut due to a broken latch or inadequate closer. Examples of non-functional doors that degraded the associated fire barriers are Door No. 211 in Reactor Building Elevation 683 feet, Door No. 109 in Core Spray Pump Room Elevation 670 feet, and the door to the North Load Center Room. In addition, doors to protected stairwells were held open by a fusible link. This will not stop smoke infiltration through the doors and would impede fire fighting effort by activation of smoke detection alarms in areas not having an actual fire.

Response

(1) Discussion on Fire Doors

Door No. 211 and Door No. 109 were repaired on 5/15/85 and 2/27/85 respectively. The four North Load Center Room Doors and Door Nos. 109 and 211 were verified to be functional on 5/22/85 by plant staff personnel.

In general, fire doors which are non-functional due to faults in the operating mechanisms such as broken latches or inadequate closure devices are addressed in the plant maintenance program. Door hardware, like any other piece of equipment, occasionally requires repair or adjustment. It is the responsibility of the individual detecting the problem to properly report it. Work requests are instituted on non-functional doors detected.

PP&L does not plan any additional corrective steps as we believe our existing maintenance program to be adequate. As non-functional doors are found they are corrected. PP&L believes the number of doors detected during the audit with faulty mechanisms is well below the threshold which would constitute a violation on the basis of inadequate maintenance of doors.

(2) Discussion of fusible links:

PP&L has provided fusible link type swinging door closures which are listed by Underwriters Laboratories. The basic standard used to investigate these products is UL 228 "Door Closers Holders and Integral Smoke Detectors". In response to FSAR Question 281.25 which requested that all fire doors be locked or alarmed, PP&L responded that fire doors would be closed or locked or alarmed or provided with automatic hold-open and release mechanisms.

In addition, PP&L could not identify any NFPA standard or NRC document which prohibits the use of fusible links. Therefore, PP&L considers the use of fusible links to be in compliance.