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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 880425 ltr re violations noted in Insp Repts 50-387/88-07 & 50-388/88-06. R
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Pennsylvania Power & Light Company

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Harold W. Keiser
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JUN 10 1988

Mr. James T. Wiggins, Chief
Reactor Projects Branch No. 3
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

SUSQUEHANNA STEAM ELECTRIC STATION
NRC INSPECTION REPORT 50-387/88-07
and 50-388/88-06
PLA-3033 FILE R41-1C, R41-2

Docket Nos. 50-387
and 50-388

Dear Mr. Wiggins:

This letter responds to your letter of April 25, 1988 which forwarded NRC Region I Combined Inspection Reports 50-387/88-07 and 50-388/88-06 with Appendix A, Notice of Violation.

The notice required submittal of a written reply within thirty (30) days of the date of the letter. Permission to delay the response was granted by Mr. R. Blough on May 24 and June 3, 1988. We trust that the commission will find the attached response acceptable.

Very truly yours,

Harold W. Keiser

Attachment

cc: NRC Document Control Desk (original)
NRC Region I
Mr. F. I. Young, NRC Sr. Resident Inspector
Mr. M. C. Thadani, NRC Project Manager

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RESPONSE TO NOTICE OF VIOLATION

PP&L recognizes the adverse trends indicated by events itemized in this Notice of Violation and other events that have occurred during the Unit 2 second refueling and inspection outage. We agree with the violations as stated. Personnel accountability and attention to details are inherent in our effort to improve performance. Although each event was mitigated and well managed to conclusion, the broad implications of these events must be analyzed in order to prevent recurrence. PP&L Management has established a Management Task Force to review and analyze the unexpected events of the outage from a broad perspective. The task force has been charged to analyze the commonality of these events, identify broad implications associated with the events and develop recommendations that will improve the safety and operation of Susquehanna Steam Electric Station. A report will be issued by July 31, 1988.

VIOLATION A.1

A. Technical Specification 6.8.1 requires that written procedures important to safety shall be established and implemented.

1. Susquehanna Steam Electric Station (SSES) operating procedure OP-235-001, "Fuel Pool Cooling and Cleanup System," requires the removal of both the common and Unit 2 filter/demineralizers (F/Ds) prior to stopping a fuel pool cooling pump.

Contrary to the above, on March 23, 1988, a Nuclear Plant Operator secured a fuel pool cooling pump prior to taking a F/D out of service resulting in a backwash of both the F/Ds.

RESPONSE

(1) REASON FOR THE VIOLATION:

As stated, violation A.1 implies that the backwash of both F/Ds was a direct result of securing a fuel pool cooling pump prior to taking the F/Ds out of service. The cause of backwash was that the letdown valve was left open contrary to operating procedures in order to provide a continuous letdown path for water being added to the reactor vessel.

(2) CORRECTIVE ACTIONS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

- a. Portions of the emergency plan organization were mobilized on a non-emergency basis to recover from the event. Access to the Reactor Building was controlled by the TSC. All affected piping was flushed to the Unit 2 CST. Water in the CST was processed through the liquid radwaste system. Sludge remaining in the CST was removed, processed, and handled as radioactive waste.
- b. Applicable operating procedures were strengthened to preclude inadvertent draining of the filter demineralizers.
- c. System Operating Procedures for Fuel Pool Cooling and Cleanup System (FPCCS) were revised to preclude inadvertent tripping of other FPCCS pumps when one FPCCS pump is secured.

d. The event and its causes were reviewed with all operating personnel.

(3) CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

A design review will be conducted to investigate possible system modifications which could prevent resin and filter materials from draining out of the fuel pool filter demineralizers on loss of flow conditions. This design review is scheduled for completion by September 30, 1988.

(4) DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

PP&L is in full compliance.

VIOLATION A.2

A. Technical Specification 6.8.1 requires that written procedures important to safety shall be established and implemented.

2. SSES administrative procedure, AD-QA-425, "Station Reporting Requirements," requires that if a press release is issued, the NRC will be notified by ENS telephone within four hours.

Contrary to the above, on March 24, 1988, at 4:00 pm, a press release was issued and the required notification was not made until March 25, 1988, at 9:35 am.

RESPONSE

(1) REASON FOR THE VIOLATION

When the TSC at Susquehanna SES is activated during an emergency, NRC is kept informed over ENS during periodic updates. In this event, the TSC was activated in a non-emergency mode and periodic updates to the NRC were not required. The failure to make an ENS call at the time of the press release was due to personnel error and procedural inadequacies. The Sr. Resident Inspector and other Region I personnel were personally apprised of the situation and the contents of the press release. In addition, PP&L telecopied the news release to the Information Manager of NRC Region I (Mr. Karl Abraham) shortly after its release. However, the shift supervisor was not notified of the press release and a timely ENS call was not made.

(2) CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

On March 25, 1988, the Shift Technical Advisor discovered that an Emergency Notification System (ENS) call had not been made concerning the news release. The STA informed the Shift Supervisor who immediately made the ENS call at about 0930.



(3) CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

Procedures will be revised by June 30, 1988, to more clearly require notification of the Shift Supervisor regarding issuance of press releases.

(4) DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

PP&L is in full compliance.

VIOLATION A.3

A. Technical Specification 6.8.1 requires that written procedures important to safety shall be established and implemented.

3. SSES work authorization (WA) V86043 requires that the reactor protective system (RPS) "states links" be closed prior to removing a temporarily installed jumper.

Contrary to the above, on March 22, 1988, an I&C technician removed the temporarily installed jumper prior to closing the states link causing a full RPS scram.

RESPONSE

(1) REASON FOR THE VIOLATION:

This incident was caused by personnel error on the part of the I&C technician.

(2) CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

Following the full RPS actuation, the scram was reset. The incident was reviewed with all I&C personnel to reemphasize the need for paying close attention to detail.

(3) CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

No further action is required.

(4) DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

PP&L is in full compliance.

VIOLATION B.1

B. Technical Specification 6.8.1 states, "Written procedures important to safety shall be established, (and) implemented . . . covering the . . . applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978 . . ."



Appendix A of Regulatory Guide 1.33, Revision 4, recommends the operation of fuel storage pool purification, cooling systems and reactor protective system be covered by applicable procedures.

1. SSES administrative procedure AD-QA-101 requires that procedures addressing these systems receive an adequate technical review. Specifically, review of the above station procedure requires that a review will be performed to ensure valve positions and positioning requirements are correct for proper system operation. In addition, the review is to ensure that procedure steps are concise and understandable.

Contrary to the above, on March 29, 1988, review of Procedure TP-235-006, "Fuel Pool Cooling System Piping Flush," was not adequate, in that the operation of the skimmer surge tank outlet valve 2-53-001 was not addressed in the procedure. As a consequence, the piping flush was attempted with the valve mispositioned.

RESPONSE

(1) REASON FOR THE VIOLATION:

Valve 2-53-001 was closed during the F/D backwash initiating event. TP-235-006 was written to flush the contaminated piping and associated equipment downstream of the FPCCS pump. The boundary of the TP was not broad enough to cover components affected by the initial event.

(2) CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

The valve was opened and the flush resumed.

(3) CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

Training of operations and technical staff personnel will be conducted by August 31, 1988 to reinforce the importance of properly bounding recovery plans when placing equipment back in service following unexpected transients.

(4) DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

PP&L is in full compliance.

VIOLATION B.2

- B. Technical Specification 6.8.1 states, "Written procedures important to safety shall be established, (and) implemented . . . covering the . . . applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978 . . ."

Appendix A of Regulatory Guide 1.33, Revision 4, recommends the operation of fuel storage pool purification, cooling systems and reactor protective system be covered by applicable procedures.

2. SSES administrative procedure AD-QA-103, "Protective Permit and Tag System," addresses the application of permits for blocking. this procedure requires the listing of electrical devices by noun name and/or component number.

Contrary to the above, on March 22, 1988, blocking permit 2-88-603 did not correctly identify fuse B21H-F6A, resulting in a wrong fuse (C72A-F6A) being pulled, causing an RPS actuation.

RESPONSE

(1) REASON FOR THE VIOLATION:

The GE panel in which the fuse was located contained fuses for more than one system. The Equipment Release Form (ERF) requesting the blocking provided insufficient information in that only an abbreviated fuse identification (F6A) was specified - the system designator was not specified. This identification would have been sufficient for specifying a fuse on a non-GE panel.

(2) CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

Following the full RPS actuation the fuse was reinstalled and the scram was reset. Applicable administrative procedures and instructions were revised to require specification of the system designator and fuse number, location and position on all requests for safety tagging involving fuses in GE panels.

(3) CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FUTURE VIOLATIONS:

No further action is required.

(4) DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

PP&L is in full compliance.

VIOLATION C

- C. Technical Specification 6.11.1 states, "Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure."

SSES health physics procedure HP-TP-310, "Posting, Labeling, and Locking Requirements," requires that entrances to the controlled zone shall be conspicuously posted.

Contrary to the above, on March 31, 1988, a personnel door in the Unit 2 turbine building southwest corner, elevation 676 foot was improperly posted while in an open position.

RESPONSE

(1) REASON FOR THE VIOLATION:

The cause of this violation was unapproved use of the door by personnel performing maintenance activities. The door was propped fully open thereby obstructing the posting.

(2) CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

All hoses which were leading through the door were removed. The posting on the door was relocated such that no positioning of the door will obstruct the sign. Other doors of similar design and use were inspected and postings were repositioned accordingly. One issue of "Station News" was dedicated to this issue.

(3) CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

Training will be conducted with all HP technicians regarding this incident by June 30, 1988.

A review of turbine building ingress/egress point controls will be undertaken and corrective actions identified by August 31, 1988.

(4) DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

PP&L is in full compliance.

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