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 AUTH. NAME: KEISER, H.W. AUTHOR AFFILIATION: Pennsylvania Power & Light Co.
 RECIP. NAME: BUTLER, W.R. RECIPIENT AFFILIATION: Project Directorate I-2

SUBJECT: Responds to NRC Bulletin 88-010, "Nonconforming Molded-Case Circuit Breakers."

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10/1/89



Pennsylvania Power & Light Company

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

Harold W. Keiser
Senior Vice President-Nuclear
215/770-4194

MAR 31 1989

Director of Nuclear Reactor Regulation
Attention: Dr. W. R. Butler
Project Directorate I-2
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION
RESPONSE TO BULLETIN 88-10
PLA-3152 FILE R41-2, R41-1A

Docket Nos. 50-387
and 50-388

Dear Dr. Butler:

Attached is PP&L's response to NRC Bulletin 88-10, "Nonconforming Molded-Case Circuit Breakers." If you have any questions, please contact Mr. R.M. Harris at (215) 770-7918.

Very truly yours,

H. W. Keiser

Attachments
Affidavit

cc: NRC Document Control Desk (original)
NRC Region I
Mr. M. C. Thadani, NRC Project Manager-Rockville
Mr. F. I. Young, NRC Sr. Resident Inspector-SSES
Mr. R. J. Bell, NUMARC
1776 Eye Street, N.W.
Suite 300
Washington, D.C. 20006-2496

IEZ1
||

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA)
: SS
COUNTY OF LEHIGH)

I, HAROLD W. KEISER, being duly sworn according to law, state that I am Sr. Vice President - Nuclear of Pennsylvania Power & Light Company and that the facts set forth on the attached response to NRC Bulletin 88-10, are true and correct to the best of my knowledge, information and belief.

H. Keiser

Harold W. Keiser
Sr. Vice President - Nuclear

Sworn to and subscribed
before me this 31st day
of March, 1989.

Martha C. Sedora
Notary Public

NOTARIAL SEAL
MARTHA C. SEDORA, NOTARY PUBLIC
ALLENTOWN, LEHIGH COUNTY
MY COMMISSION EXPIRES JAN. 15, 1990
Member, Pennsylvania Association of Notaries

RESPONSE TO BULLETIN 88-10

Nonconforming Molded-Case Circuit Breakers

PP&L identified 439 molded-case circuit breakers purchased prior to August 1, 1988, that were being maintained as stored spares for safety-related applications. This included breakers which had been procured commercial grade and had been dedicated for Class 1E use. Most of these were individual breakers, but a number of breakers were found in panels and a few in starters. PP&L does not maintain a stock of commercial grade breakers for later dedication.

Traceability has been established for 320 (73%) of these spare breakers. All breakers with inadequate traceability are on hold. Attachment 1 lists these breakers. Since less than 80% of PP&L's spare breakers have been determined to be traceable, Action 3 of the bulletin did not apply and testing of spare untraceable breakers was not required.

Traceability was established using a variety of mechanisms. In some cases, PP&L had a test report or certificate of conformance from the manufacturer. In other cases, PP&L had a packing list or evidence of direct shipment to Susquehanna SES from the manufacturer. For some of the Westinghouse breakers, PP&L was able to establish traceability to Eaton/Cutler Hammer. Based on inspection of Eaton's records, we have concluded that these breakers were provided to Eaton/Cutler Hammer directly from the manufacturer. This is based upon the following:

- o Eaton can demonstrate large purchases of Westinghouse breakers for its stock.
- o The breakers purchased by PP&L came from this stock.
- o Eaton was able to demonstrate traceability for other breakers that were special orders (not in stock).
- o Eaton has certified to PP&L that these breakers were procured directly from the manufacturer. (See Attachment 2)

PP&L has established traceability for all except five installed safety-related molded-case circuit breakers purchased after August 1, 1983. Attachment 3 provides details on these five breakers. Two of these are installed in a battery charger for the "E" Diesel Generator. These were determined to be untraceable on March 23, 1989. Justifications for continued operation will be prepared. The remaining three breakers are installed in Susquehanna SES Unit 2. Continued operation for Unit 2 has been justified until the next refueling outage, scheduled to begin in September, 1989. All five breakers will be replaced or tested prior to startup following that outage.

Procurement procedures have been revised to ensure that future purchases of molded-case circuit breakers for safety-related use will be traceable to the manufacturer. This includes commercial grade breakers purchased for dedication. Breakers purchased since August 1, 1988 but before the procurement procedures were revised will be held until traceability is established. Spare breakers which cannot be traced will be downgraded. These will be held for six months as requested by NRC Region 1 and will eventually be either released for non-safety-related use, sold, or discarded. PP&L has recently upgraded its dedication program. PP&L will also add traceability requirements for molded-case circuit breakers to its Defective Device List which is used during procurement and during receipt inspections to help assure the acceptability of material. These actions should ensure that only traceable breakers will be used or maintained as spares for safety-related applications.

Information generated in support of the above activities will be maintained as requested for at least five years.

RMH:tah
rmhmeb124a(14)

Untraceable Spare Safety-Related Molded-Case Circuit Breakers

ATTACHMENT 1

Quantity	Manufacturer	Model or Part #	Chain of Supply*
1	GE	TEC26007	Scranton
2	GE	TEC26100	Scranton
2	GE	TFK224F000	GESCO
4	Hoinemann	AM1516	Cooper
2	Hoinemann	2X-AM1516	Cooper
1	ITE	EE2-B050	Unknown
2	ITE	EF2-B050	Comsip (Linden)
1	ITE	EH2-B030	Anasco
2	ITE	EH2-B050	Kooler
29	ITE	E41B020	Unknown
1	ITE	FJ2-B225	Kooler
2	ITE	P1515	Comsip (Whittier)
2	Square D	KAL36100	Unknown
1	Square D	KAL36100	Note 1
2	Square D	KAL36225	Unknown
1	Square D	Q0015	Comsip (Linden)
2	Hastingshouse	EB2040	Power Conv. WESCO (Alahurst)
2	Hastingshouse	EHB3040L	Dauphin
1	Hastingshouse	HFB3022ML	Unknown
4	Hastingshouse	HFB3110ML	Note 1
5	Hastingshouse	HFB3110ML	Barbov
2	Hastingshouse	HFB3150	Note 1
1	Hastingshouse	HFB3190ML	Unknown
2	Hastingshouse	HFB3190ML	West Chester
3	Hastingshouse	HFB3270ML	Unknown
30	Hastingshouse	HFB3270ML	Note 1
1	Hastingshouse	HFB3480ML	Unknown
5	Hastingshouse	HFB3480ML	Note 1
2	Hastingshouse	JB3200H	Note 1
2	Hastingshouse	JB3200H	Power Conv. WESCO (Alahurst)
2	Hastingshouse	JB3250M	Unknown

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Note 1: These breakers were returned from plant installations. They were probably installed during construction.

Note 2: These were direct shipped to Cooper from the manufacturer. These will be reclassified as traceable once documentation is received.

* See next page for supplier names and addresses.

CHAIN OF SUPPLY

Anesco - Anthracite Electric Supply Company - Kingston, Pennsylvania

Barbey Electronics Corporation - Reading, Pennsylvania

Brown Electrical Products Company - Cleveland, Ohio

Comsip, Inc. - Customline Division - Linden, New Jersey

Comsip, Inc. - Instrument and Control Systems - Whittier, California

Cooper Energy Services - Mount Vernon, Ohio

Cuny & Guerber - Jersey City, New Jersey

Dauphin Electric Supply - Lewisburg, Pennsylvania

Fromm Electric - Piscataway, New Jersey

GESCO - General Electric Supply Company - Reading, Pennsylvania

Keeler-Hoff Supply Company - Williamsport, Pennsylvania

L&R Electric Supply Company - Scranton, Pennsylvania

Power Conversion Products, Inc. - Crystal Lake, Illinois

Reliable Electric Service - Reading, Pennsylvania

Scranton Electric Construction Company - Scranton, Pennsylvania

WESCO - Westinghouse Electric Supply Company - Alahurst, Illinois

WESCO - Westinghouse Electric Supply Company - Reading, Pennsylvania

West Chester Electric and Electronics - West Chester, Pennsylvania

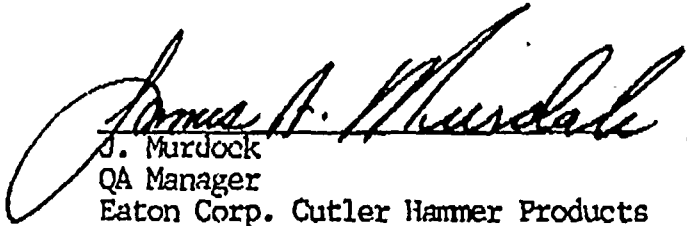
March 27, 1989

TO: R. M. Harris - PP&L Sr. Licensing Specialist
R. W. Whitmoyer - PP&L Sr. NQA Analyst

REFERENCE: NRC BULLETIN 88-010
PP&L Service Order #S-05896-5

This letter serves as certification that:

- o Eaton Corp., Cutler-Hammer Prod. Division procures all Westinghouse Breakers from Westinghouse Electric Corp. Purchase orders for stock items and special orders are placed with Westinghouse sales offices with direct shipment from Westinghouse to Eaton Corp. No distributors (e.g. Wesco) are used in the procurement of Westinghouse breakers.
- o All PP&L purchase orders for Westinghouse breakers have been filled with breakers procured directly from Westinghouse in the manner described above.


J. Murdock
QA Manager
Eaton Corp. Cutler Hammer Products

EATON

Installed Untracoable Safety-Related Molded-Case Circuit Breakers

ATTACHMENT 3

Manufacturer	Model	Chain of Supply*	System
Westinghouse	HFB3070	Dravo - Allied C&D - I/O	"E" Diesel Battery Charger (AC)
Westinghouse	LAB21500MM	Dravo - Allied C&D - I/O	"E" Diesel Battery Charger (DC)
ITE	EH2B020	West Chester	Division I Loca Isolation (Note 1)
ITE	EH2B020	West Chester	Division II Loca Isolation (Note 1)
Westinghouse	HFB3022ML	Unknown	Reactor Head Vent Valve

Note 1: Failure affects one half of isolation logic for the following:

Containment Instrument Gas
 Reactor Building Chilled Water Drywell Cooling
 Reactor Building Closed Cooling Water

* Supplier names and addresses:

Allied C&D Power Systems - Bechtelsville, Pennsylvania
 Dravo Constructors, Inc. - Pittsburgh, Pennsylvania
 I/O Electric Supply Co. - Conshohocken, Pennsylvania
 West Chester Electric & Electronics - West Chester, Pennsylvania