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AUTHOR AFFILIATION AUTH.NAME

Region 1, Ofc of the Director KANE, W.F.

RÉCIPIENT AFFILIATION RECIP.NAME

Pennsylvania Power & Light Co. KEISER, H.W.

SUBJECT: Discusses Insp Repts 50-387/89-01 & 50-388/89-01 on

890101-0204 & forwards notice of violation.

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12 MAY 1989

Docket Nos. 50-387 50-388

EA No. 88-226

Pennsylvania Power and Light Company ATTN: Mr. Harold W. Keiser Senior Vice President - Nuclear 2 North Ninth Street Allentown, Pennsylvania 18101

Gentlemen:

Subject: Notice of Violations for NRC Inspection Report Nos. 50-387/89-01

and 50-388/89-01

This letter refers to NRC inspection 50-387/89-01 and 50-388/89-01, conducted on January 1, 1989 - February 4, 1989, concerning a violation identified by your staff and reported to the NRC involving the allowable cooldown rate being exceeded after the reactor trip on January 12, 1989 for Unit 1. The results of that inspection were sent to you on March 8, 1989. On March 21, 1989, an Enforcement Conference was conducted with you and other members of your staff to discuss this violation and recent unplanned reactor trips and Engineered Safety Features (ESF) actuations. The purpose of the meeting was to discuss your characterization of the root cause and safety significance of these events, as well as your corrective actions.

From your presentation at this conference and from our preliminary review, we recognize that the cooldown rate following the reactor trip on January 12, 1989, exceeded only slightly the technical specification limit at the bottom head, therefore the technical safety significance of the event was small. Further, a reactor scram with the loss of recirculation flow typically will generate a substantial cooldown rate on the bottom head within the first hour. Nonetheless, the NRC is concerned that the cooldown rate was not identified and evaluated prior to the reactor restart. Furthermore, this failure was one of three examples of failure to properly follow your procedures which is set forth in Violation A in the enclosed Notice. This violation is classified at Severity Level IV in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, 1988. However, we emphasize that any recurrence of this violation may result in escalated enforcement action. In addition, a second violation (Violation B) in the enclosed Notice, involving several instances in which you did not provide adequate procedure's to control evolutions, is also classified at Severity Level IV. You are required to respond to this letter and in preparing your response, you should follow instructions in Appendix A.

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With respect to the plant temperature response profile for a loss of recirculation pumps, we noted from the conference that you are re-evaluating the plant response to determine the proper way to determine the cooldown rate. We will consider the appropriate set of temperatures or indications used to calculate the cooldown rate to meet the applicable technical specifications to be an unresolved issue until you have completed your analysis and a subsequent NRC review has been performed. It is our understanding, as discussed in the conference and confirmed in conversation between Mr. Byram of your staff and members of my staff, that you will seek NRC Office of Nuclear Reactor Regulation approval should you decide to remove the bottom head drain as a parameter subject to Technical Specification temperature/pressure and cooldown/heatup rate limits. Please contact this office promptly if you have a different

Your cooperation with us is appreciated.

understanding of your commitment.

Sincerely,

William F. Kane, Director Division of Reactor Projects

Enclosures:

- Appendix A, Notice of Violations
- List of Attendees to Enforcement Conference on March 21, 1989
- Licensee Presentation Slides for Enforcement Conference of March 21, 1989

cc w/encls:

- A. R. Sabol, Manager, Nuclear Quality Assurance
- E. A. Heckman, Licensing Group Supervisor
- R. G. Byram, Superintendent of Plant SSES
- S. B. Ungerer, Manager, Joint Generation Projects Department, Atlantic Electric
- J. S. Decker, Services Project Manager, General Electric Company
- B. A. Snapp, Esquire, Assistant Corporate Counsel
- H. D. Woodeshick, Special Office of the President J. C. Tilton III, Allegheny Electric Cooperative, Inc.

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