





Pennsylvania Power & Light Company

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Harold W. Keiser
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AUG 30 1989

Mr. James C. Linville, Chief
Reactor Projects Branch 2
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

SUSQUEHANNA STEAM ELECTRIC STATION
RESPONSE TO NOTICE OF VIOLATION
(387/89-15; 388/89-13)
PLA-3244 FILES R41-1C, R41-2

Docket Nos. 50-387
and 50-388

Dear Mr. Linville:

This letter provides Pennsylvania Power & Light Company's response to the Notice of Violation for NRC Combined Inspection Report 50-387/89-15 and 50-388/89-13 dated July 28, 1989.

The notice required submittal of 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,

H. W. Keiser
for H. W. Keiser

Attachment

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

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RESPONSE TO NOTICE OF VIOLATION

VIOLATION: (388/89-13-01: Unit 2)

Technical Specification 3.6.5.1 requires that secondary containment integrity be maintained while in Operational Condition 1, 2, 3 and when irradiated fuel is being handled in secondary containment. In addition, secondary containment penetrations are required to be closed or capable of being closed by an automatic isolation system per Technical Specifications 1.37 and 4.6.5.1.b.3.

Contrary to the above, during the period May 11 - May 20, 1989 while in Operational Condition 1, secondary containment penetrations (manual dampers XD-17513 and XD-17514) between Ventilation Zones I and III, which were required to be closed, were not closed or capable of being closed by an automatic isolation system.

RESPONSE:

Reference LER 50-388/89-005-00 for more details concerning this event.

1) Reason for the Violation .

- a) The equipment release form (ERF) prepared for this evolution failed to initiate entry into Operating Procedure OP-134-002. This procedure provides direction to close the isolation dampers. The ERF did not reference the correct plant system, properly identify the work to be done, equipment requested or applicable Technical Specification conditions for this evolution.
- b) Reviews of the ERF failed to identify these deficiencies. As such Operating Procedure OP-134-002 was not entered and the cross-tie between Zone I and Zone III resulted.
- c) The Railroad Access Bay (normally part of Zone III) can be aligned to Zone I by removing walls or floor hatches or opening personnel access doors. It can also be isolated from secondary containment in order to allow opening of the Railroad Access Bay door. Although complex, this design allows for the necessary access between the railroad bay and refueling floor or Unit 1 reactor building during power operation. Alignment of the railroad bay is administratively controlled.

2) Corrective Steps Which Have Been Taken and the Results Achieved .

- a) Upon discovery, Limiting Condition for Operation 3.6.5.1 was entered and then cleared when the subject isolation dampers were closed.
- b) PP&L has developed a standardized Equipment Release Form (ERF) for all Railroad Access Bay evolutions involving the removal of hatches and removal walls and the opening of the railroad bay door. This ERF will be incorporated into the Maintenance and Construction planning programs. The enhancements include direct references to plant system no. 34 (Reactor Building HVAC),

identification of which HVAC Zones are affected by the wall/hatch removal or bay door opening and the referencing of all applicable Tech Specs affected on both Unit 1 and Unit 2.

3) Corrective Steps Which Will be Taken to Avoid Further Violations

- a) Operations, Maintenance and Construction will conduct training on this event and the standardized ERF developed as a result of the event. Operations training will also emphasize the importance of thorough ERF reviews.
- b) PP&L will evaluate potential plant modifications to reduce the likelihood of mispositioned dampers.

4) Date When Full Compliance Will be Achieved

Based on (2) above, PP&L is in full compliance.

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