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 KEISER,H.W. Pennsylvania Power & Light Co.
 RECIP.NAME RECIPIENT AFFILIATION
 DURR,J.P. Region 1, Ofc of the Director

SUBJECT: Responds to NRC 890901 ltr re violations & deviations noted in Insp Repts 50-387/89-16 & 50-388/89-16.

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OCT 02 1989

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SUSQUEHANNA STEAM ELECTRIC STATION
RESPONSE TO NOTICES OF DEVIATION AND VIOLATION
(387/89-18; 388/89-16)
PLA-3265 FILES R41-1C, R41-2

Docket Nos. 50-387
and 50-388

Dear Mr. Durr:

This letter provides Pennsylvania Power & Light Company's response to the Notice of Deviation and Notice of Violation for NRC Combined Inspection Report 50-387/89-18 and 50-388/89-16 dated September 1, 1989.

Your cover letter also requested PP&L address the inspector's observations identified in the report (Detail 3.2) to improve emergency diesel generator reliability. PP&L will evaluate these observations as part of our diesel generator reliability program being developed to meet the station blackout rule (10CFR50.63). Incorporating these observations into this program will allow for a comprehensive evaluation of each and will automatically integrate the results into a total reliability program.

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

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 DEVIATION

DEVIATION (387/89-18-01; 388/89-16-01)

Revision 40 of the Susquehanna FSAR on page 9.5-39 states that the day tank contains fuel for over two hours continuous diesel generator (EDG) operation at full load. The same page indicates the fuel requirements at full rated load for diesel generators A, B, C and D to be 272 gallons per hour and diesel generator E to be 377 gallons per hour. The day tank capacity for each diesel generator is stated to be 550 gallons. The useable volume of the A through D day tanks from the tank bottom outlet to the fill pump stop level is approximately 360 gallons. A similar condition is present for day tank E.

The 550 gallon maximum capacity of the EDG fuel day tanks is consistent with the FSAR; however, contrary to the FSAR, the useable amount of fuel in the day tanks is only 360 gallons which is not sufficient to support two hours of continuous EDG operation. Furthermore, the daily operator rounds data sheet indicates a minimum acceptable day tank level of 60% for the A, B, C and D tanks and 46% for the E tank and on July 11, 1989, the inspector noted the "D" tank fuel level indicator to show a 66% level which corresponds to less than 1.2 hours of diesel operation.

RESPONSE:

1. Corrective Steps Which Have Been Taken And The Results Achieved:

PP&L has initiated an FSAR change to revise Section 9.5.4.2. This revision will clarify the amount of useable fuel capable of being stored in the day tanks. Additionally, the reference to the useable fuel in the day tank being sufficient for two hours of operation will be deleted since the design basis for the diesel generator run time is based upon useable fuel in the fuel storage tank and not the day tank. It will be incorporated into the next annual revision of the FSAR to be submitted by July 1990.

2. Corrective Steps Which Will Be Taken To Avoid Further Deviations:

No additional action required for this deviation.

3. Date When Full Compliance Will Be Achieved:

This FSAR revision will be submitted by July 1990.

RESPONSE TO NOTICE OF VIOLATION

VIOLATION (387/89-18-02; 388/89-16-02)

10CFR50 Appendix B Criterion V requires activities affecting quality to be accomplished in accordance with documented instructions or procedures.

Procedure CL-024-018, item 39 specifies the normal condition for valve 034038D on the diesel generator D2 outlet air receiver line to be the locked open position.

Contrary to the above, on July 13, 1989, the inspector observed the valve 034038D to be in the open position but unlocked. A lock and chain present on the valve stem were ineffective in locking the valve.

RESPONSE:

1. Corrective Steps Which Have Been Taken And The Results Achieved:

Upon identification by the Inspector, the locking chain was adjusted and repositioned. The subject valve, as well as the corresponding valves in the other diesel generator bays, was then verified to be in conformance with the definition of "locked" as described in administrative procedure AD-QA-302, System Status and Equipment Control. Additionally, our current locking program adequately controls the fixed position of devices identified in the program. Due to the unusual style of this valve, PP&L considers the condition cited by this violation to be an isolated case.

2. Corrective Steps Which Will Be Taken To Avoid Further Violations:

PP&L will review this incident with Operations section personnel to reinforce the contacting of Shift Supervision personnel in cases where difficulty in locking valves or devices is encountered as required by AD-QA-302. This review will be completed by January 1, 1990.

3. Date When Full Compliance Will Be Achieved:

Based on (1) above, PP&L is in full compliance.