



Pennsylvania Power & Light Company

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

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

OCT 20 1989

Mr. Jacque P. Durr, Chief
Engineering Branch
Division of Reactor Safety
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

SUSQUEHANNA STEAM ELECTRIC STATION
RESPONSE TO NOTICE OF VIOLATION (387/89-26)
PLA-3272 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 Violation for NRC Inspection Report 50-387/89-26 dated September 15, 1989.

The notice required submittal of a written reply within thirty (30) days of the date of the letter. However, as discussed with Mr. J.C. Linville of NRC Region I on October 17, 1989, PP&L has been authorized to delay the response until October 20, 1989. 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

89-0260128 3pp



RESPONSE TO NOTICE OF VIOLATION

VIOLATION (387/89-26-01)

10 CFR Appendix B Criterion IX requires that measures be established to assure that special processes such as nondestructive testing are accomplished using procedures in accordance with applicable codes.

Contrary to the above, the licensee's procedures were not adequate to prevent restart of the Unit 1 reactor on June 10, 1989 with potentially unacceptable ASME Section XI ultrasonic indications in the reactor vessel. These indications had not received appropriate evaluation and review to ensure that the required ASME Code Section XI criteria were satisfied.

RESPONSE:

1. Corrective Steps Which Have Been Taken and the Results Achieved:

- a. PP&L has determined that these indications are nonmetallic inclusions and are not rejectable flaws under ASME XI.
- b. A review of our ISI program concluded that this non compliance was an isolated event associated with the review of automated data. No automated ISI is being performed during the current Unit 2 third refueling outage. Adequate controls are in place for all ISI work currently being performed.

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

- a. The ISI Contractor program will be reviewed and additional controls incorporated, to strengthen the interface between the ISI contractor and PP&L for the control of ISI automated data review.
 - (1) ISI Contractor data package summary sheets will include a new statement that says "all data indications flagged by the GERIS computer have been evaluated and the evaluation is attached."
 - (2) The review of the data package will be performed by an independent Level III qualified individual. This individual will not be associated with any analysis of the data.
 - (3) A checklist will be used by the contractor to assure that the required analyses are completed. This checklist will also indicate that all computer flagged indications have been evaluated and that notification be prepared and submitted to PP&L prior to the restart of the unit.

- b. ASME Section XI indications of the reactor pressure vessel will be dispositioned prior to restart of the unit.
- c. Additional training will be provided PP&L personnel to better interpret the GERIS summary sheets. This increase in expertise will improve the quality of our internal surveillances of the ISI contractor.

3. Date Of Full Compliance

Based on (1) above PP&L is in compliance in that the potentially unacceptable flaws in question were determined to be not rejectable under ASME XI. Additionally, our current ISI Program is adequate for ISI being performed during the current Unit 2 Refueling and Inspection outage.

Prior to performing automated ISI, PP&L will implement any enhancements resulting from our program review.

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

SUBJECT: Responds to Violation 387/89-26-01 noted in Insp Rept
 50-387/89-26.

DISTRIBUTION CODE: IE01D COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 3
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