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 AUTH. NAME AUTHOR AFFILIATION
 KEISER, H.W. Pennsylvania Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 BELLAMY, R.R. Region 1, Ofc of the Director

SUBJECT: Responds to NRC 891122 ltr re violations noted in Insp Repts
 50-387/89-28 & 50-388/89-26.

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DEC 20 1989

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SUSQUEHANNA STEAM ELECTRIC STATION
RESPONSE TO NOTICE OF VIOLATION
(387/89-28; 388/89-26)
PLA-3310 FILES R41-1C, R41-2

Docket Nos. 50-387
and 50-388

Dear Mr. Bellamy:

This letter provides Pennsylvania Power & Light Company's response to the Notice of Violation for NRC Combined Inspection Report 50-387/89-28 and 50-388/89-26 dated November 22, 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

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

RESPONSE TO NOTICE OF VIOLATION

VIOLATION 1.0 (387/89-28-02; 388/89-26-02)

Technical Specification 6.11 requires, in part, that procedures for personnel radiation protection shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

Radiation Protection Procedure No. AD-00-705, Revision 13, states in Section 4.10, that it is the responsibility of each radiation worker to understand and comply with all health physics access control requirements. A health physics posting, posted at the Unit 2 drywell annulus entry point on October 17, 1989, specified that a health physics escort is required to enter the annulus.

Contrary to the above, at 10:00 am, on October 17, 1989, a radiation worker entered the Unit 2 drywell annulus without the required health physics escort.

RESPONSE:

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

The individual who entered the Unit 2 drywell annulus without an HP escort was counselled following the event to assure that he was aware of his mistake and that he was to be more alert to plant postings in the future.

2. Corrective Steps Which Will Be Taken to Avoid Further Violations

- a. To avoid further violations a station radiological safety note was issued to alert station personnel of the need to strictly follow the requirement of plant postings. The event identified by the Notice of Violation was also discussed in the safety note.
- b. The importance of adhering to all plant postings will be incorporated into the next pre-outage briefings given to all station personnel.

3. Date of Full Compliance

Based on (1) above PP&L is in full compliance. Additionally, the pre-outage briefings will be completed prior to beginning the next Unit 1 refueling and inspection outage currently scheduled to begin on September 8, 1990.

VIOLATION 2.0 (387/89-28-01; 388-89-26-01)

10CFR20.401(b) requires that each licensee maintain records showing the results of surveys required by 10CFR20.201(b). 10CFR20.201(b) requires that necessary and reasonable radiation surveys be made to ensure compliance with the regulations in 10CFR20. 10CFR20.101 provides limits for occupational exposure of personnel.

Contrary to the above, no radiation survey records were maintained showing the radiation measurements of the floor of the flooded equipment storage pit on October 5, 1989. Such records were required in that necessary and reasonable surveys were made and were needed to support work by divers in the flooded pit and to ensure compliance with 10CFR20.101.

RESPONSE:

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

A survey record documenting the radiological conditions of the flooded equipment storage pit floor has been generated. The survey record was based on documentation of HP technicians who performed surveys of the area. The record documents the measurements taken to insure compliance with 10CFR20.201(b).

2. Corrective Steps Which Will Be Taken to Avoid Further Violations

- a. Health Physics procedure, HP-TP-330, will be revised to emphasize the necessity of documenting radiation surveys made with respect to diving operations.
- b. Review of 10CFR20.201 has been included in the current Health Physics technician retraining cycle.

3. Date of Full Compliance

Based on (1) above PP&L is in full compliance. Health Physics Procedure HP-TP-330 will be revised prior to the next diving operation, or by March 31, 1990, whichever comes first. Also, the current Health Physics technician retraining cycle discussing 10CFR20.201 will be completed by February 28, 1990.