



Pennsylvania Power & Light Company

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

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

JAN 27 1990

Mr. Marvin W. Hodges, Director  
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 ENFORCEMENT ACTION 89-208  
NRC INSPECTION REPORT (387/89-80; 388/89-80) Docket Nos. 50-387  
PLA-3325 FILES R41-1C, R41-2 and 50-388

Dear Mr. Hodges:

This letter provides Pennsylvania Power & Light Company's response to the Notice of Violation for Enforcement Action 89-208 dated December 22, 1989, (NRC Combined Inspection Report 50-387/89-80 and 50-388/89-80 dated October 26, 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.

Your letter also requested PP&L provide a response to our actions related to Regulatory Guide 1.8, Revision 2. PP&L's commitment to Regulatory Guide 1.8, Revision 2, as stated at the Enforcement Conference was with respect to the licensed operator requalification program. Our actions are addressed in item 2 of the violation response.

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 VIOLATION

VIOLATION (387/89-80-02; 388/89-80-02)

10CFR50.54 (1) states, in part, as a condition of the facility operating license, that the licensee shall designate individuals to be responsible for directing the licensed activities of licensed operators who are senior reactor operators licensed pursuant to 10CFR55.

10CFR55.59(a)(2) states, in part, that the licensed individual must pass an annual requalification operating test.

Contrary to the above, a senior reactor operator, who had failed an annual requalification operating test administered on January 11, 1989, was designated by the licensee to be responsible for directing the licensed activities of licensed operators on fourteen (14) eight hour shifts from January 18 to January 24, 1989, for Unit 1 and from January 27 to February 2, 1989 for Unit 2. This individual was retrained and retested successfully by the licensee on February 24, 1989.

RESPONSE:

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

- a. Nuclear Training Procedure-QA-31.2, "Licensed Operator Requalification Program - Implementation", has been revised to require a licensed operator be removed from licensed duties following the failure of the annual Requalification examination.
- b. PP&L has reviewed our licensed operator requalification examination records since the effective date of the revised 10CFR55 (May 26, 1987), and determined that one other licensed operator resumed shift duties following the failure of his annual requalification examination. This individual failed the written portion of his requalification examination by less than 1% (received grade of 79.3%; required grade of 80%). Under our then existing program plant management determined this operator to be acceptable to return to licensed duties. The operator was successfully re-examined eight weeks after his initial failure.
- c. PP&L has reviewed our licensed operator requalification program against 10CFR55, NUREG-1262 and Regulatory Guide 1.8, Revision 2, and concluded that this program is in compliance with these documents.

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

PP&L will initiate revisions to the FSAR, the Technical Specifications and other nuclear department procedures to consistently document our commitment to 10CFR55 and Regulatory Guide 1.8, Revision 2 with respect to the licensed operator requalification program. These revisions will be initiated by March 31, 1990.

3. Date of Full Compliance

Based on (1) above, PP&L is in full compliance. PP&L will initiate revisions to the FSAR, Technical Specifications and nuclear department procedures with respect to the licensed operator requalification program by March 31, 1990.

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50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylv      05000388  
AUTH. NAME      AUTHOR AFFILIATION  
KEISER, H.W.      Pennsylvania Power & Light Co.  
RECIP. NAME      RECIPIENT AFFILIATION  
HODGES, M.W.      Region 1, Ofc of the Director

SUBJECT: Responds to violations for Enforcement Action 89-208 noted in Insp Repts 50-387/89-80 & 50-388/89-80.

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PDR ADCK 05000387  
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