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 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: Forwards revised response to violations noted in Insp Repts
 50-387/89-80 & 50-388/89-80,per 900122 request.

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Harold W. Keiser
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MAR 16 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
REVISED RESPONSE TO ENFORCEMENT ACTION 89-208
NRC INSPECTION REPORT (387/89-80; 388/89-80) Docket Nos. 50-387
PLA-3356 FILES R41-1C, R41-2 and 50-388

Dear Mr. Hodges:

At the request of Mr. G.S. Barber, PP&L has revised Item 2 of Violation Response 387/89-80-02; 388/89-80-02 (submitted on January 22, 1990/PLA-3325) to clearly identify our schedule of corrective actions. No other changes were made to the response.

This letter therefore provides Pennsylvania Power & Light Company's revised 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

9003210278 900306
PDR ADCK 05000387
Q PDC

TEIA
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- 2 - FILES R41-1C/R41-2 PLA-3356
Mr. Marvin W. Hodges

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 (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 revise 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. FSAR revisions will be incorporated into the next FSAR update to be submitted in July 1990. The Technical Specification change will be submitted by March 31, 1990. Nuclear Department procedures will be revised by July 2, 1990.

3. Date of Full Compliance

Based on (1) above, PP&L is in full compliance. PP&L will revise the FSAR, Technical Specifications and nuclear department procedures per the schedule identified in (2) above.