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

SUBJECT: Forwards chemistry reorganization description for plant.

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Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101-1179 • 215/770-5151

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

JUN 14 1990

Mr. Thomas T. Martin
Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

SUSQUEHANNA STEAM ELECTRIC STATION
CHEMISTRY REORGANIZATION
PLA-3398 FILE R41-2

Dear Mr. Martin:

Attached is a short description of Pennsylvania Power & Light's (PP&L) Chemistry reorganization for the Susquehanna SES. Because of the significance of Chemistry on plant systems, PP&L has created a new Chemistry Supervisor position that reports directly to the Assistant Superintendent of Plant. A Chemistry Laboratory Supervisor, a Chemistry Support Supervisor and a Senior Engineer responsible for chemistry systems report to the Chemistry Supervisor. The Chemistry Supervisor, Chemistry Laboratory Supervisor and the Chemistry Support Supervisor should be qualified to ANSI N18.1-1971 Section 4.4.3.

PP&L determined that an individual with proven management ability was needed to fill the Chemistry Supervisor position. The individual chosen has the managerial capabilities desired, but lacks the necessary educational and experience qualifications to meet Section 4.4.3 of the ANSI standard. To compensate for this lack of experience, PP&L will assure that both the Chemistry Laboratory Supervisor and the Chemistry Support Supervisor meet the ANSI standard. All ANSI required sub-tiered chemistry positions will report directly to these individuals. Also, the Chemistry Supervisor incumbent will not be allowed signature authority as a "Responsible Supervisor-Level I" in accordance with plant administrative procedures, will not be assigned emergency plan positions in the chemistry area, and will not approve the results of any Technical Specification required surveillance activities.

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PP&L's intent is to fully qualify the incumbent Chemistry Supervisor to the ANSI standard. This will be accomplished through an accelerated training program and experience in the Chemistry Supervisor position. Our intent is to have the incumbent fully qualified to ANSI N18.1-1971 Section 4.4.3 within two years. PP&L believes Technical Specification Section 6.3 requirements are met through these actions.

Very truly yours,



H. W. Keiser

Attachment

RDK:bir
RDK\NRC.E27

cc: NRC Document Control Desk (original) .
NRC Region I (w/o attach.)
Mr. G. S. Barber, NRC Resident Inspector
Mr. M. C. Thadani, NRC Project Manager

**SUSQUEHANNA S.E.S. CHEMISTRY REORGANIZATION
NRC BRIEFING**

I. Background

Over the past several years the importance of plant chemistry to the long term success of the station has become quite apparent. Coupled with this is our long term goal to be among the best in the industry in chemistry. Experience and extensive assessments throughout this period have identified a number of issues impacting the effectiveness of our chemistry program. In order to address the identified issues, a new organizational structure and additional manpower will be provided. The new organization is shown attached. Four key management positions are identified:

- o Chemistry Supervisor
- o Chemistry Lab Supervisor
- o Chemistry Support Supervisor
- o Sr. Engineer - Chemistry Systems

Technical Specification section 6.3, Unit Staff Qualification, commits the station to meeting ANSI N18.1-1971 for minimum qualification of comparable positions. The new chemistry positions have been reviewed against the requirements of ANSI N18.1-1971. Personnel filling the positions of Chemistry Supervisor, Chemistry Lab Supervisor and Chemistry Support Supervisor should meet Section 4.4.3. The Sr. Engineer - Chemistry Systems is not directly comparable to any position in ANSI N18.1-1971.

II. Evaluation

The intent of these moves is to strengthen the chemistry function. Essential to the new organization is a leader with proven management ability. Mr. Robert A. Breslin has been selected to fill this need as Chemistry Supervisor. He possesses a B.S. in Mechanical Engineering, has eleven years of nuclear experience and has completed SRO certification at SSES.

ANSI N18.1-1971 Section 4.4.3 specifies the qualifications for radiochemists. Mr. Breslin does not meet this qualification. To compensate, the following actions will be taken.

- o Both the incumbents for the Chemistry Lab Supervisor and Chemistry Support Supervisor will meet the ANSI qualification.
- o The Sr. Engineer-Chemistry Systems has a B.S. in Mechanical Engineering and 12 years of nuclear experience.

- o Mr. Breslin will not be allowed signature authority as a "Responsible Supervisor-Level I" in accordance with plant administrative procedures, will not be assigned emergency plan positions in the chemistry area, and will not approve the results of any Tech Spec required surveillance activity.

Our intent is to fully qualify Mr. Breslin to the ANSI standards. This will be accomplished through an accelerated training program and experience in the Chemistry Supervisor position. This training program is being prepared; when it is complete we will review it with you. Our intent is to use the training program and 2 years of chemistry experience to reach full ANSI qualification.

Recommended SSES Chemistry Organization (effective 5/1/90)

