



Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101-1179 • 215/774-5151

Harold W. Keiser
Senior Vice President-Nuclear
215/774-4194

APR : 8 1991

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station PI-137
Washington, DC 20555

SUSQUEHANNA STEAM ELECTRIC STATION
REPLY TO NOTICE OF VIOLATION
(387/90-26-01)
PLA-3560 FILE R41-2

Docket Nos. 50-387
50-388

This letter provides Pennsylvania Power & Light Company's reply to the Notice of Violation for NRC Combined Inspection Report 50-387/90-26 and 50-388/90-26 dated March 20, 1991.

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

cc: Region I - Regional Administrator
Mr. G. S. Barber, NRC Sr. Resident Inspector
Mr. J. J. Raleigh, NRC Project Manager

9104-220199

REPLY TO A NOTICE OF VIOLATION

A. Violation (387/90-26-01)

Technical Specification (TS) 6.8.1 requires that written procedures shall be established, implemented, and maintained covering certain activities, including the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978. Section 1.6 of Appendix "A" of the Regulatory Guide, identifies protocols affecting "Authorities and Responsibilities for Safe Operation and Shutdown", as a safety-related activity that requires written procedures. The licensee's administrative procedure AD-QA-300, "Conduct of Operations", Section 6.2, Formal Directions, states in paragraph 6.2.4, that plant operations are to be within the boundaries specified in Technical Specifications and License Conditions.

Contrary to the above, plant operations were not strictly maintained within the boundaries specified in the Technical Specifications and License Conditions. On January 15, 1991, the inboard Main Steam Isolation Valves were declared inoperable due to insufficient Containment Instrument Gas pressure. The applicable Technical Specification 3.6.3 (which requires restoration of the MSIVs to an operable status or isolation of the affected penetration(s) within four hours; or otherwise, have the plant in hot shutdown within the next twelve hours) was not implemented, in that the plant continued to operate for about seven hours without the operating staff recognizing the requirements of that Limiting Condition of Operation.

Response

1. Reason for the Violation:

On January 15, 1991, the inboard Main Steam Isolation Valves were declared inoperable due to insufficient Containment Instrument Gas pressure via TS LCO ACTION 3.4.7.a (Main Steam Isolation Valves). TS LCO ACTION 3.6.3.a (Primary Containment Isolation Valves) should also have been declared, however, this LCO (ACTION 3.6.3.a) was not referenced in the surveillance procedure which contains the criteria for Containment Instrument Gas System Pressure (SO-100-006/Shiftly Surveillance Operating Log). SO-100-006 only referenced taking LCO ACTION 3.4.7.a. The Licensed Operator did not recognize the applicability of LCO ACTION 3.6.3.a and only took LCO ACTION 3.4.7.a as referenced in the surveillance procedure. It should be noted that neither TS LCO Action statements were violated as a result of this event.



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

Surveillance procedures SO-100-006 (Unit 1) and SO-200-006 (Unit 2), "Shiftly Surveillance Operating Log", were revised to require taking Technical Specification LCO ACTIONS 3.4.7.a and 3.6.3.a when Containment Instrument Gas system pressure falls below acceptance criteria. The procedure revisions were reviewed with the Operations Shift personnel.

3. Corrective Steps Which Will Be Taken to Avoid Further Violations:

Training will be conducted for all Licensed Operations personnel, relative to this incident, to re-emphasize that all applicable Technical Specification LCO ACTIONS must be recognized and taken when a component or system is deemed INOPERABLE. This training will be completed by July 1, 1991.

4. Date of Full Compliance

Based on (2) above PP&L is in full compliance.



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AUTH. NAME AUTHOR AFFILIATION
 KEISER, H.W. Pennsylvania Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 910320 ltr re violations noted in insp repts
 50-387/90-26 & 50-388/90-26 on 910115. Corrective actions:
 surveillance procedures revised & training conducted.

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