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 50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylva 05000388  
 AUTH. NAME: KEISER, H.W. AUTHORITY AFFILIATION: Pennsylvania Power & Light Co.  
 RECIP. NAME: MARTIN, T.T. RECIPIENT AFFILIATION: Region 1 (Post 820201)

SUBJECT: Discusses failure to meet committment re installation of corrosion rate monitors, per Generic Ltr 89-13.

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Harold W. Keiser  
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SEP 09 1991

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  
DELAYED IMPLEMENTATION OF  
GENERIC LETTER 89-13  
COMMITMENT TO INSTALL CORROSION  
RATE MONITORS  
PLA-3645**

**FILE R41-2**

Docket No. 50-387  
and 50-388

- References:
1. Letter, PLA-3377, H.W. Keiser to T.T. Martin, "Supplemental Response to Generic Letter 89-13", dated April 27, 1990.
  2. Letter, PLA-3585, H.W. Keiser to T.T. Martin, "6/91 Confirmatory Response to G.L. 89-13 (Piping Inspection Program)", dated June 4, 1991.

Dear Mr. Martin:

Reference 1 provided PP&L's commitment to implement a piping inspection program in response to Generic Letter 89-13, "Service Water System Problems Affecting Safety-Related Equipment". To date, we have developed and put in place a program for ultrasonic and radiographic testing of ESW and RHRSW piping (Reference 2). The final element of the program involved the installation of corrosion rate monitoring probes by September 1, 1991.

PP&L has recently determined that our modification planning process inadvertently deferred the installation of these monitoring probes. While there is no short-term safety consequences to this deferral, as described below, failure to meet our commitment is a serious matter which is under investigation. We are assembling a broad-based team of responsible supervisors to determine the root cause of this error and to recommend changes to prevent its recurrence. We will be pleased to share the results of this investigation with you when it is completed.

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PP&L believes that deferring this modification, which was proposed to meet a Generic Letter recommendation, is of no short-term safety consequence for the following reasons:

1. PP&L has removed and examined piping samples at various locations (and for various reasons) over the life of the SSES units. Our evaluation of these samples has indicated significant margin exists prior to reaching minimum wall thickness limits.
2. PP&L Specification H-1019, "Inspection Program for Piping Corrosion and Degradation", will provide assurance of the structural integrity of the affected piping systems through routine inspections. Data will be collected that will be used to calculate general corrosion rates and ultimately, predict component service life.
3. The proposed corrosion rate monitoring probes are being installed to monitor the properties of the water in the piping to allow corrective changes to water chemistry in order to slow down corrosion rates. Given reasons 1. and 2. above, these proactive measures are not critical to assuring piping integrity for the short term.

Our new scheduled implementation date for this modification is during the third quarter of 1992. Any questions on this letter should be directed to Mr. R.R. Sgarro at (215) 774-7916.

Very truly yours,



H. W. Keiser

cc: ~~NRC Document Control Desk (original)~~  
NRC Region I  
Dr. W. R. Butler - NRC Project Director - OWFN  
Mr. G. S. Barber - NRC Resident Inspector - SSES  
Mr. J. J. Raleigh - NRR Project Manager - OWFN