



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

SEP 11 1991

Mr. W. D. Lanning, Deputy Director
Division of Reactor Safety
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

SUSQUEHANNA STEAM ELECTRIC STATION
REPLY TO NOTICE OF VIOLATION
(387/91-06-01)
PLA-3647 FILE R41-2

Docket Nos. 50-387
50-388

Dear Mr. Lanning:

This letter provides Pennsylvania Power & Light Company's response to the Notice of Violation for NRC Combined Inspection Report 50-387/91-06 and 50-388/91-06 dated August 13, 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: NRC Document Control Desk (original)
Mr. G. S. Barber, NRC Sr. Resident Inspector
Mr. J. J. Raleigh, NRC Project Manager

~~9109170317~~



REPLY TO A NOTICE OF VIOLATION

A. *Violation (387/91-06-01)*

10 CFR Part 50.55a (g) requires adherence to Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code for inservice testing (IST) of pumps and valves.

ASME B&PV Code, Section XI, Article IWV-1100, specifies, in part, that certain Class 1, 2 and 3 valves (including check valves), which are required to perform a specific function in mitigating the consequences of an accident be included in the IST program.

Licensee Procedure AD-QA-423 (Revision 8), "Station Pump and Valve Testing Program," Section 6.2.1(b), states in part that, this Test Program shall identify, test and analyze all safety-related valves for signs of possible degradation in performance over time. These components shall be tested in accordance with the Code, with appropriate relief requested for those components not testable in full accordance with the Code.

Contrary to the above, as of May 8, 1991, the licensee's IST program was inadequate in that safety related containment instrument gas check valves 1(2)-26-18 and 1(2)-26-029 were not included in the IST program nor were relief requests provided. Consequently, these check valves were not tested as required by Section XI, Article IWV-1100, of the ASME Code.

Response

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

- a) Instrument gas check valves 1(2)-26-18 and 1(2)-26-029 are being incorporated into the next revision of PP&L's IST program plan. Relief requests will be submitted to permit testing on a refueling outage frequency.
- b) The valves will be tested during the next refueling outage on each unit.

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

No additional corrective action is needed to avoid further violations.

3. *Date of Full Compliance:*

Full compliance will be achieved prior to startup following the next scheduled refueling outage on each unit. The Unit 1 6th refueling and inspection outage is scheduled to begin on March 7, 1992. The Unit 2 5th refueling and inspection outage is scheduled to begin on September 12, 1992.

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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
 LANNING, W.D. Region 1 (Post 820201)

SUBJECT: Responds to NRC 910813 ltr re violations noted in insp repts
 50-387/91-06 & 50-388/91-06. Corrective actions: Instrument
 gas check valves being incorporated into next rev of PP&L's
 IST program plan.

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PDR ADOCK 05000387
G PDR

TELL



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