

ENCLOSURE 1

NOTICE OF VIOLATION

Pennsylvania Power & Light Company
Susquehanna Unit 1

Docket No. 50-387
License No. NPF-14

During an NRC inspection conducted on January 1, 1992 - February 10, 1992, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1990), the violations are listed below:

- A. Susquehanna Unit 1 Technical Specification (TS) 6.8.1 requires that written procedures be established, implemented and maintained covering activities addressed in Regulatory Guide (RG) 1.33. RG 1.33 requires administrative procedures for safe operation and shutdown. PP&L Nuclear Department Administrative Procedure, NDAP-QA-300, "Conduct of Operations," was established in accordance with this specification. Section 4.8 and 4.9 of that procedure provides requirements, responsibilities, and authorities for assuring safe operation and shutdown, including the investigation of anomalous instrumentation indications.

Contrary to the above, on January 16, an anomalous instrumentation indication involving a control room alarm annunciating high pressure in the offgas systems was not sufficiently investigated to determine cause. As a result, an apparent detonation of combustible gas (due to the accumulation of hydrogen in the common recombiner system piping) was not recognized as having occurred. Consequently, hot work on the system was allowed to continue without effecting corrective measures.

This is a Severity Level IV violation.

- B. Susquehanna Unit 1 Technical Specification (TS) 6.8.1 requires that written procedures be established, implemented and maintained covering activities addressed in Regulatory Guide (RG) 1.33. RG 1.33 requires maintenance procedures be established. PP&L Maintenance Procedure, AD-QA-502, "Work Authorization," (WA) specifies the implementation requirements for all maintenance activities for plant systems and components. Section 6.8.1 requires workers to sign the WA as completed on the actual completion of the activity.

Contrary to the above, on June 12, 1989, a WA (WA T73111) authorizing repair activities for the actuator and valve seat for HV-16907 was signed off as completed without actually effecting the repair of the valve seat. Consequently, though the valve was assumed to provide isolation of the common recombiner system (when closed),

hydrogen gas was allowed to leak-by the impaired valve seat, accumulate in the downstream piping, and present a combustible gas hazard.

This is a Severity Level IV violation.

Pursuant to the provisions of 10 CFR 2.201, Pennsylvania Power and Light is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region I, and a copy to the NRC Resident Inspector, within 30 days of the date of the letter transmitting this Notice of Violation. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.