



**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 18 1992

Mr. Lee H. Bettenhausen, Chief  
Operations Branch  
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**  
**PLA-3851** FILE R41-2/R41-1C

Docket No. 50-387  
and 50-388

Dear Mr. Bettenhausen:

This letter provides Pennsylvania Power & Light Company's response to the Notice of Violation, for NRC Combined Inspection Report Nos. 50-387/92-18 and 50-388/92-18 dated August 14, 1992.

The notice required submittal of a written reply within thirty (30) days of the date of the letter. However, as discussed with Mr. John R. White of NRC Region I on August 27, 1992, PP&L has been authorized to delay the response until September 25, 1992, due to a delay in receipt of the Inspection Report. We trust that the Commission will find the attached response acceptable.

Very truly yours,

H. W. Keiser

Attachment

~~9209280026~~

Mr. L.E. Bettenhausen  
FILES R41-2/R41-1C PLA-3851

cc: NRC Document Control Desk (original)  
NRC Region I  
Mr. G. S. Barber - NRC Resident Inspector  
Mr. J. J. Raleigh - NRR Project Manager

REPLY TO A NOTICE OF VIOLATION

A. Violation (387/92-18-01; 388/92-18-01)

*10CFR55.25 requires, in part, that the facility licensee notify the Commission within 30 days of learning of the diagnosis of a medical condition that causes a licensed operator to fail to meet the medical requirements of 55.21*

*Contrary to the above, the facility licensee reported to the Commission in excess of 30 days of learning of the diagnosis of medical conditions that caused three licensed operators to fail to meet medical requirements. On April 16, 1991, one licensed operator was diagnosed with a need to wear corrective lenses. The NRC was notified on July 15, 1992. On April 23, 1991, one licensed operator was diagnosed with an inability to detect odors. The NRC was notified with partial information on May 29, 1991. On March 13, 1992, (NOTE: the NRC violation stated the date as March 13, 1991; however, the information contained in the report reflected the correct date of March 13, 1992) one licensed operator was diagnosed with a need to wear corrective lenses. The NRC was notified on June 11, 1992.*

Response

1. Reason for the Violation:

The reason for the failure to notify NRC, within 30 days of identification, of a change in the medical status of the licensed operator diagnosed with a need to wear corrective lenses on March 13, 1992, was identified through a root cause analysis performed after the June 11, 1992 submittal. The identified cause was that established guidance did not adequately identify distribution responsibilities to assure a timely transition of medical status information to personnel responsible for implementation of activities associated with a change in a licensed operators medical status (ie: NRC notification). Prior to June 1992, the medical status information associated with a licensed operator's annual medical examination was transmitted from the PP&L consulting physician through the PP&L Health Services organization to the Superintendent of Plant - Susquehanna with a copy to the Manager of Nuclear Operations. These managers then informally distributed this information to personnel responsible for implementation activities. If the information was not received by these managers or otherwise delayed, NRC notification within 30 days did not occur.

The notifications submitted on May 29, 1991 and July 15, 1991 were generated as a result of our corrective actions associated with the internal audit that was conducted as a result of NRC Information Notice 91-08. No specific root cause analysis was performed on these incidents; however, PP&L believes that the corrective actions taken as a result of the root cause analysis that was performed following the June 11, 1992 submittal, satisfactorily addresses the issue.



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

1. Following the submittal of the June 11, 1992, letter PP&L performed a root cause analysis as documented in SOOR 1-92-234. Corrective actions taken in response to this analysis:
  - a. Require the PP&L Health Services Department provide notification of a change in a licensed operator medical status and NRC Form 396 to the Operations Training Coordinator who then is responsible to obtain the appropriate approvals on Form 396.
  - b. Require the PP&L Health Service Department provide a copy of the notification of a change in a licensed operator medical status to personnel responsible for NRC notifications.
2. Operations procedure OI-AD-074 was revised to provide written communication guidelines for documenting licensed operator medical status changes.
3. Operations procedure OI-AD-010 was revised to require Licensed Operators provide written notification of a change to their 10CFR55.21 medical status that is not identified through the routine medical examinations.

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

A Nuclear Department Administrative Procedure (NDAP) will be developed to procedurally identify interdepartmental responsibilities. The activities to be incorporated into the NDAP are being performed as noted in (2) above, however they are not procedurally documented in an interdepartment procedure. The development of the NDAP is therefore considered an enhancement and is not required to prevent further violations.

4. Date of Full Compliance:

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



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 50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylvania 05000388

AUTH. NAME: KEISER, H.W. AUTHOR AFFILIATION: Pennsylvania Power & Light Co.  
 RECIP. NAME: BETTENHAUSEN, L. RECIPIENT AFFILIATION: Region 1 (Post 820201)

SUBJECT: Responds to NRC 920814 ltr re violations noted in insp repts 50-387/92-18 & 50-388/92-18. Corrective actions: Operations procedure OI-AD-074 revised to provide written communication guidelines for documenting licensed operator changes.

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