



Pennsylvania Power & Light Company

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

John

Harold W. Keiser
Senior Vice President-Nuclear
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NOV 24 1992

Mr. Edward C. Wenzinger, Chief
Reactor Projects Branch 2
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

SUSQUEHANNA STEAM ELECTRIC STATION
REPLY TO NOTICE OF VIOLATION
(387/92-22 & 388/92-22)
PLA-3869 FILE R41-2

Docket Nos. 50-387
50-388

Dear Mr. Wenzinger:

This letter provides Pennsylvania Power & Light Company's response to the Notice of Violation for NRC Combined Inspection Report 50-387/92-22 and 50-388/92-22 dated October 22, 1992.

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

Attachment

cc: NRC Document Control Desk (original)
Mr. G. S. Barber, NRC Sr. Resident Inspector
Mr. R. J. Clark, NRC Sr. Project Manager

9212010291

7pp.

REPLY TO A NOTICE OF VIOLATION

A. Violation (388/92-22-01)

Technical Specification 6.8.1 requires that written procedures be established, implemented and maintained covering the activities referenced in Regulatory Guide 1.33. Regulatory Guide 1.33 requires the licensee to comply with ANSI N18.7-1976/ANS-3.2. ANSI N18.7-1976/ANS-3.2, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants", paragraph 5.2.7 requires that maintenance or modifications on safety related equipment be preplanned and performed in accordance with written procedures, documented instructions or drawings appropriate to the circumstances, and paragraph 5.3.5 requires the procedures to contain enough detail to permit the maintenance to be performed correctly and safely.

Contrary to the above, on September 9, 1992, insulation was removed from the Unit 2 High Pressure Coolant Injection (HPCI) and Reactor Core Isolation Cooling (RCIC) Systems with the plant operating at power without any procedure or instruction. Additionally, the insulation was removed without any prior knowledge or authorization from anyone in the operations department.

Response

1. Reason for the Violation

On September 9, 1992, insulation was removed from the Unit 2 High Pressure Coolant Injection (HPCI) and Reactor Core Isolation Cooling (RCIC) systems with the unit operating at 60% power. The insulation was being removed in preparation for the Unit 2 Fifth Refueling Outage which commenced on September 12, 1992. This event occurred due to the fact that the insulation removal work was performed prior to the HPCI and RCIC systems being taken out of service. The "support" work review process for removing insulation from HPCI/RCIC systems on September 9 failed to identify the operational and potential environmental qualification consequences of removing insulation from these two systems.

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

- a. Immediate corrective action was to reinstall the removed insulation on the HPCI and RCIC systems.
- b. The HPCI and RCIC room coolers were operated to decrease the room temperatures. Both the HPCI and RCIC system remained operable throughout the event.



- c. The scheduling process for maintenance "support" work was reviewed as a result of this event. This review revealed that a procedure/policy governing insulation control does not exist at the Station. Insulation activities are performed utilizing two engineering specifications which only address technical/mechanical applications of removal/installation of insulation.

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

- a. A Planning Directive will be issued which will clarify the status control requirements for insulation. This Planning Directive will state that whenever the Unit is in Condition 1, 2 or 3, an Equipment Release Form (ERF) will be required to be submitted to Operations prior to removing insulation; and whenever the Unit is in Condition 4, 5 or *, an ERF will be required on a system basis in order to remove insulation. (This has been verbally communicated with the Maintenance Planners.) This Planning Directive will be issued by November 30, 1992.
- b. The Planning and Production organizations will be trained on the Planning Directive. This training will be completed by December 31, 1992.

4. Date of Full Compliance:

Based on (3) above, PP&L will be in full compliance by December 31, 1992.

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B. Violation (387/92-02-02)

Technical Specification 6.8.1 requires that written procedures be established, implemented and maintained covering the activities referenced in Regulatory Guide 1.33. Regulatory Guide 1.33 requires that administrative procedures be implemented. Licensee Administrative Procedure AD-QA-482, Post Maintenance/Modification Test Program requires that testing be performed following maintenance or modification to ensure proper system function prior to restoring a system to an operable status.

Contrary to the above, on August 2, 1992, after installation of a newly design flow orifice, the "A" Control Structure Chilled Water System was returned to an operable status without performing the required post maintenance testing. AD-QA-482 requires that post maintenance/modification testing be performed prior to returning a safety system to an operable status. Subsequent testing identified flow rates which were slightly less than the design flow rate.

Response

Reference LER 50-387/92-013-00 for more details concerning this event.

1. Reason for the Violation

The reason for the failure to perform post modification testing following installation of the flow orifice in the "A" Control Structure Chilled Water System was:

- a. The system engineer identified the required retesting and initiated the work document to perform the testing. He failed to properly link that testing to operability per AD-QA-482.
- b. The modification was performed under the Work Authorization (WA) Program and not as a design change package (DCP). The design change program contains additional programmatic checks that would have linked the flow testing to operability.

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

- a. Post modification testing to determine the flow through the "A" Control Structure Chilled Water System was performed upon recognition that flow data had not been previously obtained.

- b. Upon identification that the measured flow was below the design flow rate, the flow orifice was removed from the system, restoring it to its previous configuration.

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

- a. Training will be provided to system engineering personnel to emphasize:
 - (1) The system engineer's role in specifying post modification testing requirements for Modifications, WA's and NCR dispositions. These testing requirements will consider its impact to system operability.
 - (2) The proper use of "Repair" or "Use-as-is" dispositions to NCR's, and
 - (3) Situations in the deficiency control program where the design change process is needed.
 - (4) The requirements of AD-QA-482.

This training will be completed by March 31, 1993.

- b. Revise the NCR procedure (AD-QA-120) to address the necessity for post modification/maintenance testing considerations in the disposition of NCR's and to clearly identify when a DCP is required for an NCR disposition. This revision will be completed by March 31, 1993.

4. Date of Full Compliance:

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

C. Violation (387/92-22-03)

10CFR50.59 allows holders of a licensee authorizing operation of a facility to make changes to the facility as described in the safety analysis report without prior Commission approval unless the proposed change involves an unreviewed safety question.

Contrary to the above, on August 2, 1992 a change was made to the Control Structure Chilled Water System which altered the flow rate of the system to less than that required. No safety evaluation was performed to determine whether the design change resulted in an unreviewed safety question as required by 10CFR50.59.

Response

Reference LER 50-387/92-013-00 for more details concerning this event.

1. Reason for the Violation

The reasons for the failure to perform a safety evaluation (50.59 evaluation) for the modification to the "A" Control Structure Chilled Water System were as follows:

- a. The belief that the installation of a flow orifice in this system was considered to be bounded by the non-conformance report (NCR) and work authorization (WA) programs and not a modification requiring evaluation and processing through the formalized design change package (DCP) program, and
- b. The belief that the selected design documents reviewed correctly identified the design of the system. The flow orifice installation was considered necessary to meet the design basis of the system.

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

- a. The flow orifice in the "A" Control Structure Chilled Water System was removed following identification that Startup Field Request (SFR) 2923 had previously removed the flow orifice to achieve required flow.
- b. NCR 91-0344 was re-dispositioned to update the design documents to reflect the flow orifice removal per SFR 2923.

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

Training will be provided to system engineering personnel to emphasize:

- (1) The proper use of "repair" or "Use-as-is" dispositions to NCR's and
- (2) Situations in the deficiency control program where the design change process is needed.

This training will be completed by March 31, 1993.

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 50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylv 05000388
 AUTH. NAME AUTHOR AFFILIATION
 REISER, H.W. Pennsylvania Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 WENZINGER, E.C. Region 1 (Post 820201)

SUBJECT: Responds to NRC 921022 ltr re violations noted in insp repts
 50-387/92-22 & 50-388/92-22. Corrective actions: Planning
 Directive will be issued by 921130 that will clarify status
 control requirements for insulation.

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PDR ADDCK 05000387
PDR

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