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FIL: 50-387 Susquehanna Steam Electric Station, Unit 1, Pennsylv 05000387
50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylv 05000388
AUTH.NAME AUTHOR AFFILIATION
HODGES, M.W. Region 1 (Post 820201)
RECIP.NAME RECIPIENT AFFILIATION
KEISER, H.W. Pennsylvania Power & Light Co..

SUBJECT: Discusses insp repts 50-387/92-23 & 50-388/92-23 on
920824-1009 & forwards notice of violation.

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Docket Nos. 50-387
50-388

EA No. 92-234

Mr. Harold W. Keiser
Senior Vice President - Nuclear
Pennsylvania Power & Light Company
2 North Ninth Street
Allentown, Pennsylvania 18101

Dear Mr. Keiser:

SUBJECT: NOTICE OF VIOLATION - INSPECTION REPORT NOS. 50-387/92-23
AND 50-388/92-23

This refers to the special fire protection safety inspection conducted from August 24 to October 9, 1992, at both the Susquehanna Steam Electric Station and at your Allentown, Pennsylvania, offices. During the inspection, four apparent violations related to your fire protection program were identified. The inspection report which documents these findings was transmitted to you on December 4, 1992. The issues related to the apparent violations were discussed at an enforcement conference at the NRC Region I office on January 19, 1993. Persons attending the conference are identified in Attachment 1. Also, copies of your visual presentation material used at the conference are included as Attachments 2 and 3 to this letter.

The first apparent violation concerned your apparent failure to perform Technical Specification inspections on Kaowool fire barrier cable raceway wrap systems and gypsum board fire enclosures since their installation over ten years ago. This finding was based on information contained in the surveillance procedure in use at the time of our inspection and discussions with personnel performing the surveillance inspection. Your investigation subsequent to our inspection determined that Kaowool wrap and gypsum board enclosures had been inspected until a procedure change made in December 1989 deleted inspections for these fire barrier materials. An NRC inspection, performed on January 20 and 21, 1993, to be documented in NRC Inspection Report Nos. 50-387/93-01 and 50-388/93-01, reviewed your records and confirmed your finding. You further indicated you are now in the process of enhancing your procedures and processes for performing these surveillance inspections. Also, surveillances have been re-performed in plant areas containing the fire barrier materials in question using enhanced methods. No significant additional discrepancies were identified.

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The second apparent violation concerned the inadequate implementation of the fire protection program quality assurance requirement to have field personnel verify that fire protection installations were installed in accordance with design specifications. You have nearly completed a comprehensive plant walkdown of installed fire wrap barriers. All identified fire barrier defects have been or are being repaired.

The third apparent violation concerned the failure to follow procedures to apply adequate quality measures to fire protection program design drawings. You have nearly completed a comprehensive plant walkdown to compare their drawings to the installed fire wrap barriers. All the drawing errors found have been corrected and further drawing enhancements are planned.

The fourth apparent violation concerned the finding that Kaowool fire barrier material had been installed in an area that was not protected by automatic fire suppression and where Kaowool has not been specifically approved for use. Your plant walkdowns have identified no other areas that contained Kaowool that were not protected by a suppression system or did not have an NRC approved exemption. To correct this deficiency, you are planning to remove the Kaowool and replace it with Thermo-Lag material.

Although not an enforcement action, an unresolved item (URI 387 and 388/92-03-01) that concerned the use of a Thermo-Lag configuration in three areas was also discussed during the enforcement conference. In response to this unresolved item, you noted that our inspection report had stated that: (1) there was reasonable basis for PP&L to believe the NRC's rejection of the cable tray portion of the test results in 1982 applied only to the three fire areas for which there had been an exemption request, and (2) that in 1982, PP&L was not aware of and was not attempting to meet the 250 degree temperature rise criterion. At the enforcement conference, you indicated that our inspection report adequately defined PP&L's position, with respect to SSES spray-on Thermo-Lag fire barrier configuration. Therefore, you believe that your staff had addressed all of the NRC's concerns at the time of licensing.

Based on our inspection findings as documented in the subject inspection report and your presentation at the enforcement conference, we consider this unresolved item to be closed. However, closure of this item does not constitute an NRC position on the acceptability of the use of Thermo-Lag installed in your plant or the Thermo-Lag test acceptance criteria which you used. These items are part of a generic issue concerning the acceptability of Thermo-Lag which is currently under review by the NRC. Licensee actions concerning the use of Thermo-Lag are addressed in NRC Bulletins 92-01 and 92-02, Supplement 1; and Generic Letter 92-08.

Although the four apparent violations noted above were collectively initially considered for escalated enforcement action, we have determined that this action was not appropriate in this instance. Our determination is based on your description of the causes, safety significance of the violations and your corrective actions to the identified deficiencies, as well as a subsequent review of our overall inspection findings.

However, the above activities appear to be in violation of NRC requirements, as specified in the enclosed Notice of Violation (Notice). The violations are of concern because each of these violations could be attributed to the inadequate application of quality and lack of management oversight to changes in the fire protection program that allowed these violations to occur undetected over a considerable period of time. It is noted that all of the violations were NRC identified; it was also noted that once these problems were identified, you initiated prompt and extensive corrective action.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document room.

The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96.511.

Sincerely,

Original Signed By:
Marvin W. Hodges

Marvin W. Hodges, Director
Division of Reactor Safety

Enclosures:

1. Appendix A, Notice of Violation
2. Attachment 1, Personnel Attending The Enforcement Conference
3. Attachment 2, Licensee Response Presented at the Enforcement Conference
4. Attachment 3, Supporting Information to Licensee Response

Mr. Harold W. Keiser

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cc w/encls:

- J. M. Kenny, Nuclear Licensing
- H. G. Stanley, Superintendent of Plant-SSES
Vice President, Nuclear Operations
- M. M. Urioste, Nuclear Services Manager, General Electric Company
- R. M. Peal, Supervisor, Nuclear Compliance
- H. D. Woodshick, Special Office of the President
- J. C. Tilton, III, Allegheny Electric Cooperative, Inc.
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