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 RECIPIENT NAME RECIPIENT AFFILIATION
 Region 1 (Post 820201)

SUBJECT: Responds to NRC 930308 ltr re violations noted in insp repts
 50-387/93-01 & 50-388/93-01.C/As: procedure revised to
 require that start & stop times of individual instrument,
 taken out-of-svc, be recorded on surveillance coversheet.

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APR 06 1993

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SUSQUEHANNA STEAM ELECTRIC STATION
REPLY TO NOTICE OF VIOLATION
(388/93-01-01)
PLA-3950 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 50-387/93-01 and 50-388/93-01 dated March 8, 1993.

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,


R. G. Byram

Attachment

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

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PDR ADCK 05000387
Q PDR



REPLY TO A NOTICE OF VIOLATION

A. Violation (388/93-01-01)

10 CFR 50, Appendix B, Criterion V requires that procedures be written to ensure that specific quantitative and qualitative information be provided to demonstrate satisfactory accomplishment. Technical Specification (TS) 3.3.3, Table 3.3.3-1, footnote (a) allows channels to be made inoperable for a period not exceeding two hours without tripping the affected channel as long as the redundant channel in the same trip system is operable. Nuclear Department Administrative Procedures (NDAP-QA-722, Step 6.7.1) only suggests that start and stop times be documented by the assigned work group for surveillances that specify an allowed performance time, i.e., the amount of time before a TS action must commence.

Contrary to the above, on February 10, 1993, upon the licensee's completion of a 18 month calibration of the reactor water level-low-low-low trip channels (Level 1) in accordance with surveillance procedure SI-280-303, the inspector determined that the procedure did not ensure that specific quantitative and qualitative information was provided to demonstrate satisfactory accomplishment. Specifically, the procedure did not require that the out-of-service times for the safety-related reactor water level detectors be recorded to assure sufficient monitoring and control of the two hour allowed performance time. Further, no other licensee procedure or practice provided assurance that the two hour allowed performance time was being effectively monitored or controlled. The time that each individual channel was actually out-of-service could not be determined, but was not expected to exceed two hours based on past practice.

Response

1. Reason for the Violation

Although Susquehanna station procedures did not specifically require documentation of the allowed out-of-service times or Allotted Performance Times (APT), compliance with Technical Specification APT requirements was being maintained by the I&C work group during the performance of surveillances with APTs. Compliance with technical specification requirements and associated technician responsibilities were also included in the I&C technician training and certification program.

Station administrative procedure NDAP-QA-0722, Rev. 0, which became effective on 1/05/93, suggested that the work groups document the start and stop times for equipment taken out-of-service for surveillance purposes. Prior to 1/05/93, the effective procedure (AD-QA-422) only required the work group to be responsible to assure that the equipment is returned to service within the required time period. Both procedures

required entry into appropriate LCO action statements if the APT was exceeded. Additionally, I&C surveillance procedures specifically identify the APTs in the surveillance procedure, and also identify their associated technical specifications requirements.

I&C and Operations personnel closely coordinate the performance of instrument surveillances. Consequently, if any condition is identified which would affect the operability of the equipment being surveilled, I&C would notify Operations that a LCO needs to be entered.

Even though no documentation existed to verify equipment out-of-service time did not exceed technical specification requirements, I&C technicians understood and accepted the responsibility for complying with APTs. It was therefore believed that compliance with the Technical Specifications was being adequately implemented and controlled.

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

- a. Procedure NDAP-QA-0722 was revised (PCAF 1-93-1532) to require that the start and stop times of individual instrument channels, when taken out-of-service, be recorded on the surveillance authorization (SA) coversheet. Start and stop times are now being recorded on SA coversheet.
- b. I&C crew personnel have been trained by I&C supervision regarding the changes to the application of APTs.

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

No additional actions are necessary.

4. Date of Full Compliance:

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