

filed 6/30/93



Pennsylvania Power & Light Company

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

Robert G. Byram
Senior Vice President-Nuclear
215/774-7502

JUN 28 1993

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**

(387/93-07-01)

PLA-3993

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 50-387/93-07 and 50-388/93-07 dated May 27, 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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REPLY TO A NOTICE OF VIOLATION

A. Violation (387/93-07-01)

Technical Specification 6.8.1 requires that written procedures be established, implemented and maintained covering activities referenced in Regulatory Guide 1.33. Regulatory Guide 1.33 requires licensees to establish administrative procedures for equipment control.

Nuclear Department Administrative Procedure NDAP-QA-0302, System Status and Equipment Control, requires additional controls for containment boundary valves located outside containment. Specifically, manual valves shall be closed, locked and tagged.

Procedure CL-152-0012, Unit 1 HPCI system - Mechanical, Item 50 specifies the normal position of the 155F092 HPCI turbine exhaust breaker test valve as locked, closed, capped, and containment tagged.

Contrary to the above, on April 20, 1993, the inspector discovered that the HPCI turbine exhaust vacuum breaker test valve (155F092) was closed, but unlocked. All other required valve attributes were proper.

Response

1. Reason for the Violation

An investigation was performed to identify the cause of this event; however, the exact cause could not be determined. The investigation included the following activities:

- A document search was performed to identify all work performed on the valve, in the vicinity of the valve, or on the same system (HPCI). All identified work documents were reviewed to determine when the valve was unlocked. Operators involved in the last known manipulation of the valve were interviewed. Since it has been over a year since the valve was operated, no significant details were recalled.
- A search of the Susquehanna Equipment Information System (SEIS) database was performed to identify all valves in the same room. Room I-106 contains 17 valves; 15 on HPCI, 2 on RCIC.

ATTACHMENT TO PLA-3993
FILE R41-2
PAGE 2 OF 2

- The Unit Logs and Reactor Building NPO logs were reviewed. No mention of 155F092 being unlocked was discovered.
- A field review was also performed as part of the investigation. The valve is located in a locked room, not a high traffic area. The chain used to lock the valve is normally placed through the valve yoke and handwheel, not around the pipe. It is located approximately eight feet off the floor.

This investigation did not identify any unusual conditions, incidents, or cause for the valve being unlocked.

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

- a. The valve was verified closed and locked.
- b. The corresponding Unit 2 valve was verified to be closed and properly locked.
- c. CL-152-0012 was performed again. No other unlocked or mispositioned valves were discovered.
- d. Operations has performed an evaluation of this occurrence. Procedures for CL performance and training were reviewed. The corrective actions identified in 3 below resulted from this evaluation and review.

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

- a. Nuclear Training Procedure (NTP-QA-32.1), "ASO/NPO Operator Training and Qualification Program" will be revised to require a discussion and demonstration of proper valve locking. This procedure will be revised by 8/01/93.
- b. Operator training on existing procedural controls and expectations concerning CL performance, valve locking requirements, and status control is being performed during operator requalification cycle 93-03. This training is scheduled to be completed by 9/15/93.
- c. Demonstration of proper valve locking by incumbents will be performed during operator requalification cycle 93-04. This training is scheduled to be completed by 10/15/93.

4. Date of Full Compliance:

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

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 BYRAM, R.G. Pennsylvania Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 WENZINGER, E.C. Region 1 (Post 820201)

SUBJECT: Responds to NRC 930527 ltr re violation noted in Insp Rept.
 50-387/93-07. Corrective actions: demonstration of proper
 valve locking by incumbents will be performed during
 operator requalification cycle 93-04 w/completion by 931015.

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