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

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Mr. Thomas T. Martin
Regional Administrator
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

SUSQUEHANNA STEAM ELECTRIC STATION RESUMPTION OF REFUELING ACTIVITIES PLA-4045 FILE R41-2

Docket No. 50-387

Dear Mr. Martin:

The purpose of this letter is to inform you that Pennsylvania Power and Light Company (PP&L) has met the conditions as specified in Confirmatory Action Letter 1-93-18 dated October 29, 1993 and is planning to resume refueling activities. As stated in the Confirmatory Action Letter PP&L has:

- 1. Reviewed all root cause analyses and corrective and compensatory actions with Mr. Rob Temps (AIT Leader).
- 2. Made available for review by the AIT, all documentation (including analysis, assessments, reports, procedures, drawings, personnel training and qualification records, and correspondence) that have pertinence to the refueling bridge problems encountered during the current refueling activities.
- 3. Made available for review by the AIT, all equipment, assemblies, and components that were associated with the problems encountered during the current refueling activities.
- 4. Made available for interview by the AIT, all personnel that were associated with, or have information or knowledge that pertains to the problems encountered during the current refueling activities.

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9312200322 931104 PDR ADOCK 05000387 P PDR Specifically, PP&L has performed thorough root cause analyses of refueling floor activities during the U1-7RIO, with particular emphasis on problems encountered during the recent refueling operations at SSES. Results of these reviews indicate several areas which contributed or caused these difficulties. They are as follows:

- 1. Procedures for refueling activities, while addressing all necessary aspects, were not consolidated and user-friendly.
- 2. The design of the refueling masts at SSES did not take into account simultaneous horizontal and vertical movements with a loaded grapple. This was not fully understood nor included in operating procedures.
- 3. Maintenance support activities for refueling floor work were controlled by generic work plans.
- 4. Two incidents of mast section binding and subsequent release of middle sections were caused by bent mast sections. The first followed a scraping of an unloaded grapple across the vessel flange protector. The second was caused by a rapid stopping/reversal of the refueling bridge in a horizontal direction with the grapple loaded with a control rod blade guide assembly.

PP&L has identified several corrective actions and compensatory measures. These are to support resumption of fuel load in the current outage and enhancement of refueling operations in future outages. They include:

- 1. Preparation and issue of a single procedure for direction of all core refueling activities for the current refuel outage.
- 2. Specific direction incorporated into operating procedures which prohibits simultaneous horizontal and vertical movement of the refueling bridge mast/grapple assembly. Also, all horizontal movement of the refueling bridge mast/grapple assembly is restricted to movement with the mast in the normal up position, except for fuel assemblies near the periphery.
- 3. Maintenance support activities will require specific work authorizing documents and work instructions.
- 4. The Unit 1 bridge has been outfitted with a new mast/grapple assembly.
- 5. Training on the events and the revised procedures will be conducted prior to resuming core alterations for all licensed operators assigned refueling duties.
- 6. Evaluation of potential interferences with double blade guide movement in the spent fuel pool. Any identified issues will be resolved prior to resuming refueling activities.

PP&L has identified two additional compensatory measures which are being implemented for the current refuel outage. After the current outage, these compensatory measures will be evaluated for their applicability in future outages. These compensatory measures are:

- 1. Engineering personnel will be stationed on the refueling floor. He will observe all refueling activities and will be available for consultation to assure proper refueling bridge operations.
- 2. Once every 24 hours, refueling activities will be halted to conduct a partial maintenance test that assures the continued reliable performance of the refueling bridge.

While several further enhancements are being implemented and longer term enhancements are being evaluated for future refueling outages, the above specific actions, when complete, will insure that all refueling activities are conducted in a safe manner.

Based upon the above, PP&L has met the conditions of the Confirmatory Action Letter and is preparing to resume refueling activities.

If you have any questions, please contact us.

Very truly yours,

cc:

NRC Document Control Desk (original)

Mr. R. J. Clark, NRC Sr. Project Manager

Mr. G. S. Barber, NRC Sr. Resident Inspector (SSES)

Mr. R. Temps, NRC Sr. Operations Engineer - Region I

Mr. W. P. Dornsife, PA DER/BRP

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