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### Pennsylvania Power & Light Company

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Robert G. Byram Senior Vice President—Nuclear 610/774-7502 Fax: 610/774-5019

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JAN 27 1994

Mr. James H. Joyner, Chief
Facilities Radiological Safety and Safeguards Branch
Division of Radiation Safety and Safeguards
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

# SUSQUEHANNA STEAM ELECTRIC STATIONREPLY TO NOTICE OF VIOLATION(387/93-21-01)PLA-4086FILE R41-2

Docket Nos. 50-387 50-388

Dear Mr. Joyner:

This letter provides Pennsylvania Power & Light Company's response to the Notice of Violation for NRC Combined Inspection Report 50-387/93-21 and 50-388/93-21 dated December 29, 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

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

102030101

#### <u>REPLY TO A NOTICE OF VIOLATION</u>

#### A. <u>Violation</u> (387/93-21-01)

Technical Specification 6.12.1 states: "In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR Part 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a high radiation area ..."

Contrary to the above, on November 1, 1993, a high radiation area barricade (ropes) was found to be down and the high radiation area sign was missing. The unbarricaded high radiation area, located on the Unit 1 Reactor Building 719-foot elevation by the south CRD scram discharge header, had dose rates of approximately 800 mrem/hr contact and 200 mrem/hr general area.

#### <u>Response</u>

#### 1. <u>Reason for the Violation</u>

This particular high radiation area barricade consisted of two pieces of rope tied together. The two pieces of rope became untied causing the high radiation area barricade to fall to the floor and the high radiation sign to fall behind a piece of equipment.

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

- a. The high radiation area was re-barricaded and posted immediately. The rope barricade was replaced with a single piece of rope and thoroughly secured at each end.
- b. Other areas of the plant were inspected to identify any similar uses of knotted ropes. No other similar barricades were identified.
- c. Procedure (HP-TP-310, Posting and Labeling) has been revised to state that use of ropes tied together should be avoided.
- d. A letter was issued to station personnel from the VP-Nuclear Operations reinforcing the importance that plant personnel contact HP whenever radiological posting problems are noted.

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

- a. Training (HP-II/GET) will be revised to reinforce the importance that plant personnel contact HP whenever radiological posting problems are noted.
- b. The event and corrective actions will be reviewed with all HP Technicians and HP First Line Supervisors by March 1, 1994.

#### 4. <u>Date of Full Compliance</u>:

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







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