



Pennsylvania Power & Light Company

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SEP 28 1995

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
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SUSQUEHANNA STEAM ELECTRIC STATION
REPLY TO NOTICE OF VIOLATION
(388/95-17-01)
PLA-4370

FILE R41-2

Dockets Nos. 50-387
and 50-388

This letter provides Pennsylvania Power & Light Company's response to the Notice of Violation for NRC Combined Inspection Report 50-387/95-17 and 50-388/95-17 dated August 29, 1995.

The notice required submittal of a written reply within thirty (30) days of the date of the letter transmitting the Notice of Violation. We trust that the commission will find the attached response acceptable.

Very truly yours,

R. G. Byram

Attachment

copy: NRC Region I
Ms. M. Banerjee, NRC Sr. Resident Inspector
Mr. C. Poslusny, NRC Sr. Project Manager

020077

~~9510020335-950928~~
PDR ADDCK 05000387
Q PDR

IEO/ 11



REPLY TO A NOTICE OF VIOLATION

Violation : (388/95-17-01)

Technical Specification (TS) 3.8.3.1 Limiting Condition for Operation (LCO) specifies action to be taken when one of the required Unit 1 and common A.C. distribution system load groups are not energized. TS 3.0.3 states that when an LCO is not met, within one hour action shall be initiated to place the unit in at least hot shutdown within 12 hours and at least cold shutdown in subsequent 24 hours.

SSES procedure SE-124-207, Revision 8, 18 Month Emergency Diesel Generators Auto Start and Engineered Safety System Buses Energization on Loss of Off-site Power with a LOCA, disables the auto-close permissive relays for the primary and alternate supply breakers to ESS buses 1B and 1D. With the auto-closure of the primary and alternate supplies defeated, the buses are considered de-energized. SE-124-207, step 6.4.4, directs operators to enter TS 3.0.3 because more than one ESS bus is considered de-energized and TS 3.8.3.1 no longer applies.

Contrary to the above, on April 29, 1995, during the performance of SE-124-207, TS 3.0.3 was not entered when the auto-close permissive relays for the primary and alternate supply breakers to ESS buses 1B and 1D were disabled.

Response

1. Reason for the Violation

The reasons for the failure to enter the Unit 2 Technical Specification LCO 3.0.3 for the engineering surveillance procedure SE-124-207 (Division II, 18 month Emergency Diesel Generator (EDG) LOCA/LOOP test) are as follows:

- There was an incorrect evaluation of the necessity for Technical Specification 3.0.3 entry. This was due to the limited information provided in the surveillance procedure, incomplete information provided by the test director, and an incomplete review of applicable Technical Specification interpretations.
- Final corrective actions to a precursor event processed under our previous corrective action system were not adequately disseminated to the Operations organization. Therefore, Operations' personnel were not formally trained on revisions made to the engineering surveillance procedure concerning Technical Specification LCO 3.0.3 applicability.

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

- a. Counseling was provided to applicable Operations management personnel by senior station management addressing the issue of entry into Technical Specification LCO 3.0.3 while performing the identified EDG surveillance testing. Additionally, the event and circumstances of the event were included as a Manager of Operations Agenda training item and provided to the licensed operators.
- b. Counseling was provided to the applicable test director concerning entry into Technical Specification LCO 3.0.3 for the identified EDG surveillance testing. The test director was also counseled concerning the inappropriate decision to concur with actions inconsistent with a procedure step without a thorough understanding of the bases for that procedure step.
- c. The engineering surveillance procedures (SE-124-107/207), which control the 18 month diesel generator LOOP/LOCA testing, were revised to assure that the basis for entry into Technical Specification LCO 3.0.3 is clearly stated.
- d. The new Condition Report program (deficiency management system) requires that communications with affected departments occur in the evaluation and development of the action plan.

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

- a. Test director training will be developed and conducted which emphasizes Engineering management's expectations when questions and/or disagreements with the action/s called out in a procedure being run by a test director arise.
- b. Licensed operator training will be developed and conducted addressing the entry into Technical Specification LCO 3.0.3 for the above discussed EDG testing.
- c. Submit a technical specification change that will preclude the need for entry into Technical Specification LCO 3.0.3 during the above discussed EDG testing. This amendment request is scheduled to be submitted by December 29, 1995.

4. Date of Full Compliance

Full compliance was achieved on April 29, 1995, upon completion of the 18 month diesel generator LOCA/LOOP testing.

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 50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylvania 05000388

AUTH. NAME AUTHOR AFFILIATION
 BYRAM, R.G. Pennsylvania Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Forwards response to NRC 950829 ltr re violations noted in insp repts 50-387/95-17 & 50-388/95-17. Corrective actions: counseling was provided to applicable Operations mgt personnel by senior station mgt.

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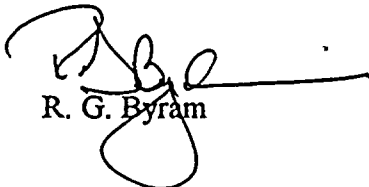
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1-1-52

