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AUG 09 1996

U.S. Nuclear Regulatory Commission
Attn.: Document Control Desk
Mail Station P1-137
Washington, D. C. 20555

**SUSQUEHANNA STEAM ELECTRIC STATION
REPLY TO NOTICE OF VIOLATION
NOS. 50-387/388/96-03-01, 96-03-02, 96-03-03
PLA-4492 FILES A17-12/R41-2**

**Docket Nos. 50-387
and 50-388**

*Reference: Letter, J. T. Wiggins to R. G. Byram, "Notice of Violation
No. 50-387/388/96-03-01, 96-03-02, 96-03-03," dated June 10, 1996.*

The purpose of this letter is to provide the required response to the referenced June 10, 1996 Notice of Violation. Our formal reply is provided as Enclosure 1 to this letter.

As discussed in the predecisional enforcement conference on May 7, 1996, PP&L believes that our Corrective Action Program remains effective. These violations have focused our attention on the need to enhance the use of the Licensing Basis in the corrective action process, and to reemphasize its importance to our personnel. PP&L's ongoing efforts in reviewing Licensing Basis issues will continue to enhance our overall sensitivity to the potential regulatory significance of deficiencies that have low safety consequences: Please be assured that PP&L continues to act on all of the actions outlined in the conference.

Any questions on our response should be directed to Mr. J. M. Kenny at (610) 774-7535.

Very truly yours,


R. G. Byram

Enclosure: "Reply to a Notice of Violation"

copy: Regional Administrator, NRC Region I
Mr. K. M. Jenison, NRC Sr. Resident Inspector - SSES
Mr. C. Poslusny, Jr., NRC Sr. Project Mgr. - OWFN
Mr. W. P. Dornsife, Pa. DEP

4608140216 LPP

REPLY TO A NOTICE OF VIOLATION

Statement of Violation A:

A. "10CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," requires, in part, that measures shall be established to assure that significant conditions adverse to quality, such as failures, deviations, and nonconformances, are promptly identified and corrected.

Contrary to the above, significant conditions adverse to quality were not promptly identified and corrected specifically:

1. From April, 1993 to March 1996, the licensee failed to ensure the Reactor Water Cleanup (RWCU) ventilation area leak detection and isolation system would operate in accordance with the system design requirements outlined in an October 1992 Safety Evaluation Report (SER). The licensee did not promptly correct this nonconformance, as a result, the Unit 2 RWCU ventilation area leak detection and isolation system was in an indeterminate state of operability from April 1993 to June 1995.
2. Since November 1995, the licensee has failed to restore seismic monitoring system instrumentation to the locations outlined in the plant Technical Specifications (TS) or implement the associated TS ACTION statement. The licensee did not promptly correct this nonconformance, and as a result, at the close of the inspection report period, the licensee was not in compliance with the plant TS."

PP&L Response to A.1:

Admission or Denial of the Alleged Violation:

PP&L admits the violation.

The Reasons for the Violation if Admitted:

- On April 30, 1993, as a result of an approved Technical Specification amendment, a setpoint change was implemented on the subject Unit 2 RWCU instrumentation channels. To maintain the design basis for this new setpoint, an adjustment to the room air supply louvers was planned but not implemented. It was subsequently determined that the setpoint calculation for both units had not considered the most limiting conditions for avoidance of spurious isolations.
- An engineering deficiency report was written and an operability determination was performed assuming both the Unit 1 and Unit 2 air supply louvers were in the same position. It was later found during deficiency resolution activities that the Unit 2 louvers were not in the assumed position; they were subsequently restored to be consistent with Unit 1. Based on the actual position of the Unit 2 louvers, it was determined that the Unit 2 RWCU Penetration Room Differential Temperature channels were inoperable from April 30, 1993 to June 26, 1995.

Based on the above, the reasons for the violation were, the deficiency in the original setpoint calculation, and the subsequent unverified assumption regarding the position of the Unit 2 air supply louvers.

The Corrective Steps That Have Been Taken and the Results Achieved:

- The setpoint calculations have been completed, and a proposed amendments to the Technical Specifications documenting new Trip Setpoints and Allowable Values for both units were submitted to the NRC on June 10, 1996.
- The louvers on the Unit 2 air supply register were adjusted to be consistent with Unit 1. This action returned the channels to an operable condition.

The Corrective Actions That Will be Taken to Avoid Further Violations:

A procedure identifying the requirements for controlling manually adjustable passive air distribution equipment will be developed and communicated to the appropriate work groups in the department. Adjustments to these devices will be documented under existing department programs. This action will be completed by September 15, 1996.

The Date By Which Full Compliance Will be Achieved:

Full compliance was achieved on June 26, 1995, when the Unit 2 air supply register louver was repositioned.

PP&L Response to A.2:

Admission or Denial of the Alleged Violation:

PP&L does not contest the violation.

The Reasons for the Violation if Admitted:

PP&L's approach to the seismic monitor location issue has been consistently based on its safety significance, which has been shown to be minimal. The reason for this violation was a failure to fully consider the regulatory implications of the deficiencies in determining the priority and extent of our corrective actions.

The Corrective Steps That Have Been Taken and the Results Achieved:

Seismic monitors VT15701/25701 have been relocated from the reactor building basemat to the containment foundation. This action provides complete consistency between the plant and the Technical Specifications.

The Corrective Actions That Will Be Taken to Avoid Further Violations:

The FSAR will be clarified to ensure that no further questions are raised regarding the location description of seismic monitor VT15702. This action will be completed no later than the next required FSAR update.

The Date by Which Full Compliance Will be Achieved:

Full compliance was achieved on July 1, 1996, when seismic monitors VT15701/25701 were relocated to the location described in the Technical Specifications.

Statement of Violation B:

B. "Technical Specification (TS) 3.3.7.2 requires that at all times the seismic monitoring instrumentation listed in (TS) Table 3.3.7.2.-1 shall be operable. Table 3.3.7.2-1 requires seismic monitoring instrumentation to be located on the containment foundation. The TS ACTION statement requires that with one or more of the seismic monitoring instruments inoperable for more than 30 days, a Special Report shall be prepared and submitted to the Commission within the next 10 days outlining the cause of the malfunction and the plans for restoring the instrument(s) to operable status.

Contrary to the above, since November 7, 1995, and as of March 8, 1996, seismic monitoring instruments listed in TS Table 3.3.7.2-1 were not located on the containment foundation and were therefore inoperable for more than 30 days, and a Special Report was not prepared and submitted to the commission within the next 10 days."

PP&L Response to B:

Admission or Denial of the Alleged Violation:

PP&L does not contest the violation.

The Reasons for the Violation if Admitted:

PP&L did not submit a Special Report because the subject seismic monitor was determined to be operable. This determination was based on guidance found in Generic Letter 91-18 ("Information to Licensees Regarding Two NRC Inspection Manual Sections on Resolution of Degraded and Nonconforming Conditions and on Operability"). PP&L interpreted this guidance to allow determination by analysis that the specified function of the monitors would be conservatively met with the monitors in their incorrect location. Therefore, the monitors were considered operable, but in a nonconforming condition that was required to be corrected to "full qualification" on a priority consistent with its safety significance. Although PP&L believes that this interpretation was consistent with the guidance in Generic Letter 91-18, it now recognizes, based on this violation, that this interpretation is not accepted.

The Corrective Steps That Have Been Taken and the Results Achieved:

Seismic monitors VT15701/25701 have been relocated from the reactor building basemat to the containment foundation.

The Corrective Actions That Will Be Taken to Avoid Further Violations:

A Special Report will be submitted to the NRC by September 6, 1996.

PP&L will review its interpretation of Generic Letter 91-18 as part of ongoing industry efforts to clarify a number of Licensing Basis issues. Our procedure on Operability Determinations will be updated as necessary to reflect the results of these discussions. In the interim, similar types of non-conformances will be reviewed more critically for regulatory significance, and reviewed with the NRC if questions arise.

The Date by Which Full Compliance Will be Achieved:

Full compliance will be achieved by September 6, 1996, when the Special Report is submitted to NRC.

Statement of Violation C:

C. "10CFR50.71(e) requires, in part, that licensees revise the Final Safety Analyses Report (FSAR) annually or six months after each refuel outage provided the interval between successive updates to the FSAR does not exceed 24 months. The revisions must reflect all changes up to a maximum of six months prior to the date of filing. The revisions shall include the effects of all changes made to the facility as described in the FSAR.

Chapter 5 of the Susquehanna FSAR states the Reactor Water Cleanup (RWCU) ventilation differential temperature isolation system can detect and isolate a 5 gallon per minute (gpm) RWCU system pipe leak.

In October 1992, the NRC approved a licensee Technical Specification change request that decreased the sensitivity of the RWCU leak detection system from 5 to 25 gpm. The licensee implemented the Technical Specification change in April 1993.

Contrary to the above, as of March 8, 1996, the licensee had not updated Chapter 5 of the Susquehanna FSAR to reflect the changes to the RWCU leak detection system sensitivity that were implemented in April 1993.



PP&L Response to C:

Admission or Denial of the Alleged Violation:

PP&L admits the violation.

The Reasons for the Violation if Admitted:

PP&L's setpoint change program does require review and update of the FSAR. In this particular case, FSAR change documentation packages were prepared, but their review became protracted due to a deficiency which questioned the setpoint basis, and because of its relationship to a Design Basis Document on steam leak detection that was under review at the same time.

The Corrective Steps That Have Been Taken and the Results Achieved:

The FSAR was updated in Revision 49, dated May 9, 1996.

The Corrective Actions That Will Be Taken to Avoid Further Violations:

PP&L will provide enhanced procedural controls to ensure compliance with 10CFR50.71 requirements by October 18, 1996.

The Date by Which Full Compliance Will be Achieved:

Full compliance was achieved on May 9, 1996, when FSAR Revision 49 was submitted to the NRC.



CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9608140216 DOC. DATE: 96/08/09 NOTARIZED: NO DOCKET #
FACIL: 50-387 Susquehanna Steam Electric Station, Unit 1, Pennsylv 05000387
50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylv 05000388
AUTH. NAME AUTHOR AFFILIATION
BYRAM, R.G. Pennsylvania Power & Light Co.
RECIP. NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 960610 ltr re violations noted in insp rept
50-387/96-03 & 50-388/96-03. C/A: completed setpoint
calculations, adjusted louvers on Unit 2 & relocated seismic
monitors VT15701/25701 to containment foundation.

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PP&L Response to A.1:

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PP&L admits the violation.

The Reasons for the Violation if Admitted:

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