

NOTICE OF VIOLATION

Pennsylvania Power and Light Company (PP&L)
Susquehanna Steam Electric Station (SSES)
Unit 1 and Unit 2

Docket Nos. 50-387, 50-388
License Nos. NPF-14, NPF-22

During an NRC inspection conducted from April 8, 1997, through May 19, 1997, three violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- 1a. Technical Specification (TS) 6.8.1 requires that written procedures shall be established and implemented for applicable procedures recommended in Appendix 'A' of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33, Appendix 'A,' item 1.I, requires procedures for refueling operations. Operating Procedure, OP-ORF-005, Refueling Operations, was established by the licensee to control the movement of fuel assemblies and blade guides in and around the reactor pressure vessel.

Contrary to the above, Susquehanna operating procedure, OP-ORF-005, Refueling Operations, was inadequate in that it did not clearly control the movement of single blade guides. Precautions at the beginning of the procedure disagreed with instructions in the body of the procedure. As a result of this inconsistency, refueling operators moved single blade guides in the automatic/semi automatic mode and a single blade guide impacted the Unit 2 reactor pressure vessel flange cover.

- b. Technical Specification (TS) 6.8.1 requires that written procedures shall be established and implemented for applicable procedures recommended in Appendix 'A' of Regulatory Guide 1.33 Revision 2, February 1978. Regulatory Guide 1.33 Appendix 'A,' item 5 requires procedures for emergencies and item 6 requires procedures for abnormal, offnormal or alarm conditions. Item 6 states that the procedures for offnormal conditions should include immediate operator action. SSES Alarm Response Procedure AR-015-D4, Stack Monitoring System Hi Hi Radiation, establishes the expected operator response to a Hi Hi System Particulate Iodine Noble Gas alarm.

Contrary to the above, alarm response procedure AR-015-D4, Stack Monitoring System Hi Hi Radiation, was inadequate in that substep 2.2.1b requires the operator to notify chemistry to confirm the validity of a System Particulate Iodine Noble Gas alarm. This action which could take up to two hours did not agree with a procedural requirement of the Emergency Plan.

Section 5.0 of the SSES Emergency Plan states that an Unusual Event should be declared as soon as it has been indicated and verified. However, it sets the parameters of the time expected to verify the need for an Unusual Event by stating that all reasonable efforts are implemented to make this verification within fifteen minutes of the initial indication of the event. The AR procedure limited the operator to a validation process which could take up to two hours before directing him to the



Emergency Plan. Therefore, the AR did not contain reasonable validation criteria, and it did not agree with and delayed entry into the Emergency Plan.

This is a Severity Level IV violation (Supplement 1).

2. 10 CFR 50 Appendix B, Criterion XI, Test Control, requires, in part, that the licensee establish a test program to assure that testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed according to written test procedures that include provisions for suitable environmental conditions.

Contrary to the above, on April 24, 1997, the Unit 1 Core Spray System Division I quarterly surveillance test procedure, SO-151-A02, specified that operators vent the core spray pumps prior to starting them in order to verify operability. This activity resulted in the Core Spray pumps being tested in a condition that was different from the as-found condition, thereby potentially affecting the validity of the surveillance test results.

This is a Severity Level IV violation (Supplement 1).

3. 10 CFR 50.59 states, in part, that licensees may make changes in the facility as described in the final safety analysis report without prior Commission approval unless the proposed change involves an unreviewed safety question. The licensee shall maintain records of changes in the facility and of changes in procedures made pursuant to this section. These records must include a written safety evaluation which provides the bases for the determination that the change does not involve an unreviewed safety question.
 - a. Contrary to the above, on June 21, July 10, and December 9, 1996, PP&L blocked open doors to rooms with high energy line break (HELB) protective features prior to performing a safety evaluation to determine if these changes to the facility constituted an unreviewed safety question.
 - b. Contrary to the above, on December 20, 1995, PP&L increased the float voltage for both Unit 1 and Unit 2, 250 Vdc batteries prior to performing a safety evaluation to determine whether the increased voltage would degrade the connected safety-related loads.
 - c. Contrary to the above, PP&L installed temporary test equipment on the operable 'A' and 'C' emergency diesel generators in support of surveillances on November 10 and November 20, 1996, respectively, without performing a safety evaluation to determine whether this change to the facility constituted an unreviewed safety question.
 - d. Contrary to the above, on May 5, 1997, PP&L cross connected the normal and backup fire protection systems and the systems have remained in the cross connected condition without first performing a safety evaluation for the proposed change to the facility as described in the Final Safety Analysis Report (FSAR). This



constitutes a change to the normal fire protection system which is described in the FSAR and TS 3/4 7.6.

This is a Severity Level IV violation (Supplement 1).

Pursuant to the provisions of 10 CFR 2.201, Pennsylvania Power and Light Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region I, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at King of Prussia, Pennsylvania
this 23rd day of June 1997

