

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Susquehanna Steam Electric Station - Unit 1						DOCKET NUMBER(2) 0 5 0 0 0 3 8 7 1			PAGE (3) OF 0 4	
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TITLE (4)
Requirements for Testing Activated Carbon Samples Not Met

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)		
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES		DOCKET NUMBER(S)
0 7	1 9	9 7	9 7	0 1 3	0 0	0 7	2 1	9 7	Susquehanna SES Unit 2		0 5 0 0 0 3 8 8

OPERATING MODE (9) 1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 1.1 (Check one or more of the following) (11)										
POWER LEVEL (10) 1 0 0	<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.405(c)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(b)							
	<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)							
	<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> OTHER (Specify in Abstract below and in Text, NRC Form 366A)							
	<input type="checkbox"/> 20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(v)(A)								
	<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(1)(2)(v)(B)								
<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(v)(C)									

(LICENSEE CONTACT FOR THIS LER (12))

NAME Cornelius T. Coddington - Senior Engineer-Licensing	TELEPHONE NUMBER AREA CODE 7 1 7 5 4 2 - 3 2 8 9
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE) NO

EXPECTED SUBMISSION DATE (15)

MONTH	DAY	YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On June 19, 1997, at 1400, with both Unit 1 and Unit 2 in Condition 1 (Power Operation) at 100% power, during a review of the specification used to purchase new activated carbon, it was determined that the requirements for periodic testing of used activated carbon samples by laboratory analysis differed from the requirements as specified by Technical Specification surveillances 4.6.5.3.b.2, 4.6.5.3.c, 4.7.2.b.2, and 4.7.2.c. On June 25, 1997, it was determined that the Technical Specification requirements for testing were not being met. This constitutes a condition prohibited by Technical Specifications. Limiting Condition For Operation (LCO) 3.0.3 was entered until enforcement discretion was granted. The cause of the event was determined to be human performance in that it was not recognized that the Technical Specifications needed to be revised when improved industry standards for testing activated carbon were identified in 1987. A Technical Specification change has been requested from the NRC. In 1996, specific training on maintaining licensing basis documents has been provided to engineering and management personnel. An evaluation of processes, such as revising tests and standards used by PP&L, will be performed to insure consistency with licensing documents. There were no safety consequences or compromises to public health and safety as a result of this event since the test methodology used provided greater assurance to determine the adsorption capability of the charcoal.

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**LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION**

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Unit 1		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER						
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TEXT (If more space is required, use additional NRC Form 366A's) (17)

EVENT DESCRIPTION

On June 19, 1997, at 1400, with both Unit 1 and Unit 2 in Condition 1 (Power Operation) at 100% power, during a review of the specification used to purchase new activated carbon, it was determined that the requirements for periodic testing of used activated carbon samples by laboratory analysis differed from the requirements as specified by Technical Specification surveillances 4.6.5.3.b.2, 4.6.5.3.c, 4.7.2.b.2, and 4.7.2.c. On June 25, 1997, it was determined that the Technical Specification requirements for testing were not being met. This constitutes a condition prohibited by Technical Specifications. Limiting Condition For Operation (LCO) 3.0.3 was entered and enforcement discretion was requested from the NRC and granted by them.

Background

The Technical Specifications contain Limiting Conditions For Operation (LCO) for the Standby Gas Treatment System (SGTS; EISS Code: BH) and the Control Room Emergency Outside Air Supply System (CREOASS; EISS Code: VI). The associated surveillance requirements require that laboratory analysis of carbon samples meet the laboratory testing criteria of Regulatory Guide 1.52, Revision 2, March 1978.

Regulatory Position C.6.a.(3) of Regulatory Guide 1.52, Revision 2 requires that representative samples of used activated carbon pass the laboratory tests listed in Table 2 of the Regulatory Guide. In Table 2, "Laboratory Tests for Activated Carbon," the applicable test for activated carbon bed depths of 4 inches or greater is test 5.b at a relative humidity of 70% for a methyl iodide penetration of less than 0.175%. A footnote for this test requirement directs the reader to Table 5-1 of ANSI N509-1976.

Table 5-1 of ANSI N509-1976 is entitled "Summary Table of New Activated Carbon Physical Properties Batch Tests To Be Performed On Finished Adsorbents." Test 5.b (as referenced in Regulatory Guide 1.52, Revision 2) is this table refers to a radioiodine removal efficiency qualification test for new activated carbon using methyl iodide at 80°C and 95% relative humidity. The acceptable test method is RDT-M16-1T, paragraph 4.5.3, except at 80°C and 95% relative humidity with the pre- and post-loading sweep medium at 25°C.

As a result of heightened awareness to the need for evaluating impacts to licensing documents as a result of changes to processes (e.g., testing, specifications, etc.), Pennsylvania Power and Light Company (PP&L) identified, during review of the specification used to purchase new activated carbon, that a discrepancy existed between the test procedures/conditions of the plant's Technical Specifications and those used in Surveillance Testing. PP&L had earlier determined that the vendor's testing at 30°C and 95% relative humidity in accordance with ASTM D-3803-1979 was acceptable. However, PP&L did not

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FACILITY NAME (1) Unit 1 Susquehanna Steam Electric Station	DOCKET NUMBER (2) 0 5 0 0 0 3 8 7	LER NUMBER (6)					PAGE (3)		
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TEXT (If more space is required, use additional NRC Form 366A's) (17).

revise the Technical Specification requirements to reflect the use of the ASTM D-3803-1979 standard in lieu of RDT-M16-1T, which was referenced as an "acceptable test method" in ANSI N509-1976, which in turn was referenced in Regulatory Guide 1.52, Revision 2.

CAUSE OF EVENT

The cause of the event was determined to be human performance in that it was not recognized that the Technical Specifications needed to be revised when improved industry standards for testing activated carbon were identified in 1987.

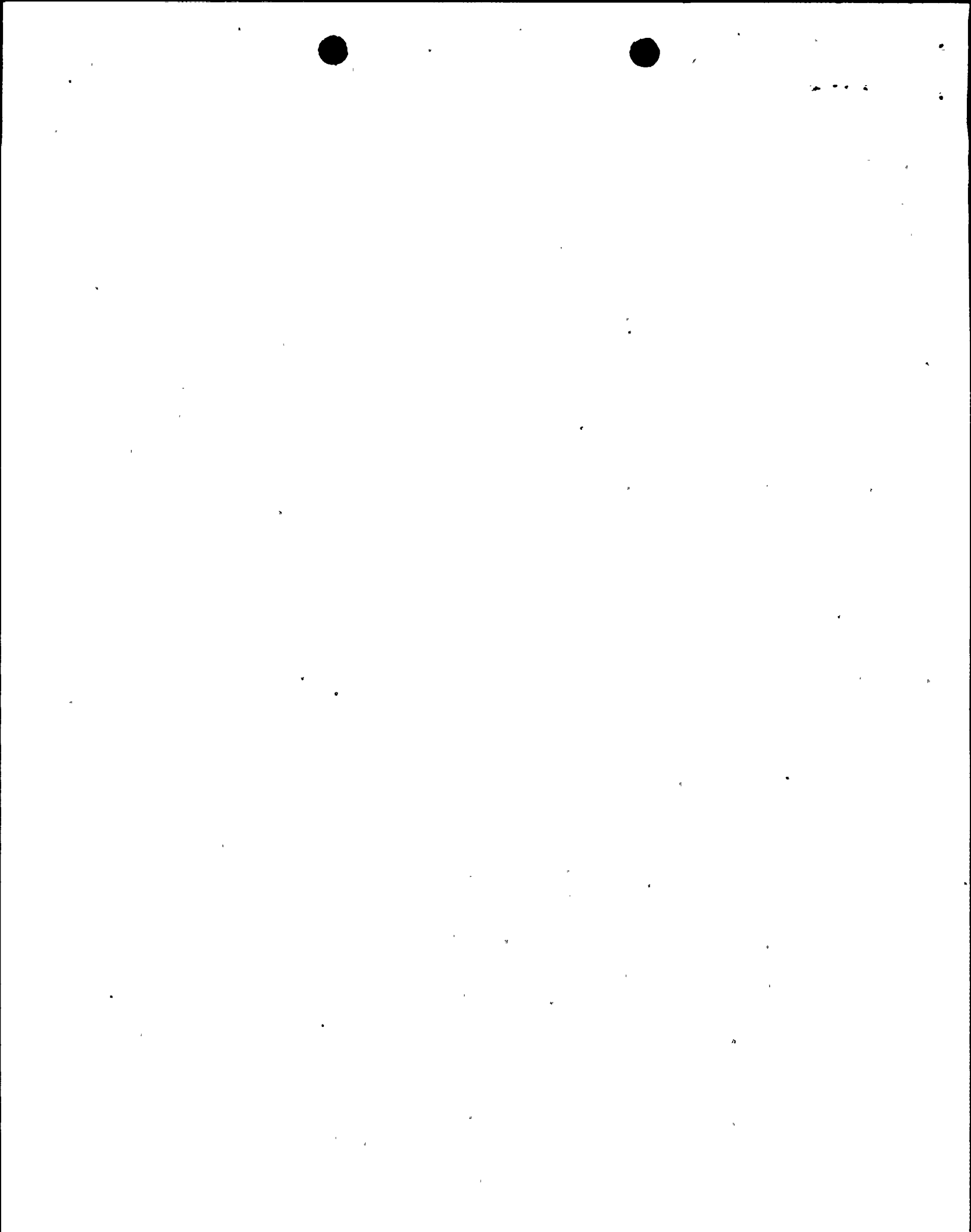
REPORTABILITY/ANALYSIS

This event was determined to be reportable per 10CFR50.73(a)(2)(i)(B), in that Susquehanna SES Units 1 and 2 were in a condition prohibited by the Technical Specifications in that the requirements for periodic testing of used activated carbon by laboratory analysis as specified by Technical Specification surveillances 4.6.5.3.b.2, 4.6.5.3.c, 4.7.2.b.2, and 4.7.2.c were not met. PP&L changed the standard being used for laboratory testing of used activated carbon from RDT-M-16-1T to ASTM D 3803-1979 without revising the Technical Specifications. This discrepancy was noted during a review of the purchase specification for new activated carbon.

The major difference between the testing standard in the Technical Specifications (RDT-M-16-1T and Regulatory Guide 1.52 Revision 2) and the standard used by vendor (ASTM D 3803-1979) is that the Technical Specifications required testing of the activated carbon sample at 80°C and 95% relative humidity while the tests were conducted using 30°C and 95% relative humidity. PP&L had determined that the use of ASTM D 3803-1979 was conservative.

When it was determined that the literal requirements of the Technical Specifications were not being met, LCO 3.03 was entered. Enforcement discretion from the NRC was requested and granted. NRC agreed that the ASTM D 3803-1979 methodology with a test temperature of 30°C and 95% relative humidity provides greater assurance to determine the adsorption capability of the charcoal than the test methodology required in the Technical Specifications. There were no safety consequences or compromises to public health and safety as a result of this event.

In accordance with the guidelines provided in NUREG-1022, Supplement 1, Items 14.1 and 10CFR50.4, the required submission date for this report was determined to be July 21, 1997.



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YEAR		SEQUENTIAL NUMBER		REVISION NUMBER														
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4	OF	4																

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CORRECTIVE ACTIONS

The following corrective actions have been taken:

- Enforcement Discretion for both Unit 1 and Unit 2 was requested by PP&L and granted by NRC.
- A change to the Technical Specifications has been submitted to the NRC.
- In 1996, specific training was instituted to raise the awareness of keeping Licensing Basis Documents up to date. This training was provided to both Management and Engineering personnel.

The following corrective actions are being taken:

- A review of the procurement and design input processes will be completed to ensure consideration of licensing document changes as a result of changes in those processes (e.g., testing methodology, specifications, etc.)
- As part of PP&L's Current Licensing Basis project, an evaluation of processes, such as revising tests and standards used by PP&L, will be performed to insure consistency with licensing documents.

ADDITIONAL INFORMATION

Past Similar Events: None

Failed Component: None