

PRIORITY 1
(ACCELERATED RIDS PROCESSING)

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9502100326 DOC. DATE: 95/02/03 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.
 RECIPIENT NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Forwards response to NRC 941222 ltr re violations noted in insp repts 50-387/95-25-01 & 50-388/94-25-01. Corrective actions: evaluatio was performed on external training identified above that was completed on 940825.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 3
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:

05000387

	RECIPIENT ID CODE/NAME		COPIES		RECIPIENT ID CODE/NAME		COPIES	
	PD1-2	PD	LTR	ENCL			LTR	ENCL
			1	1	POSLUSNY, C		1	1
INTERNAL:	ACRS		2	2	AEOD/DEIB		1	1
	AEOD/SPD/RAB		1	1	AEOD/SPD/RRAB..		1	1
	AEOD/TTC		1	1	DEDRO		1	1
	<u>FILE CENTER</u> 02		1	1	NRR/DISP/PIPB		1	1
	NRR/DORS/OEAB		1	1	NRR/DRCH/HHFB		1	1
	NUDOCS-ABSTRACT		1	1	OE DIR		1	1
	OGC/HDS2		1	1	RGN1 FILE 01		1	1
EXTERNAL:	LITCO BRYCE, J H		1	1	NOAC		1	1
	NRC PDR		1	1				
NOTES:			1	1				

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK, ROOM P1-37 (EXT. 504-2083) TO ELIMINATE YOUR NAME FROM DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTR 21 ENCL 21



Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

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

FEB 03 1995

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

SUSQUEHANNA STEAM ELECTRIC STATION
REPLY TO NOTICE OF VIOLATION
(387/94-24-01 AND 388/94-25-01)
PLA-4255 FILE R41-2

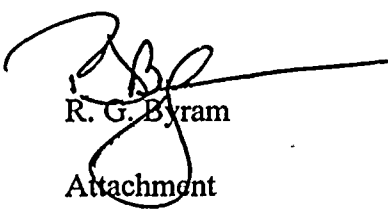
Docket Nos. 50-387
50-388

Dear Sir:

This letter provides Pennsylvania Power & Light Company's response to the Notice of Violation for NRC Combined Inspection Report 50-387/94-24 and 50-388/94-25 dated December 22, 1994.

The notice required submittal of a written reply within thirty (30) days of the date of the letter transmitting the Notice of Violation. However, as discussed with Mr. James H. Joyner of Region I on January 17, 1995, PP&L has been authorized to delay the response until February 3, 1995, due to a delay in receipt of the Inspection Report. We trust that the commission will find the attached response acceptable.

Very truly yours,


R. G. Byram

Attachment

cc: Regional Administrator - Region I
Ms. M. Banerjee, NRC Sr. Resident Inspector
Mr. C. Poslusny, Jr., NRC Sr. Project Manager

9502100326 950203
PDR ADOCK 05000387
Q PDR

JED



REPLY TO A NOTICE OF VIOLATION

Violation (387/94-24-01; 388/94-25-01)

10 CFR 71.5 entitled "Transportation of Licensed Material," states that "Each licensee who transports licensed material outside of the confines of its plants or other place of use, . . . shall comply with the applicable requirements of the regulations . . . in 49 CFR 170 through 189".

49 CFR 172.704 entitled "Training Requirements" paragraph (d) (1-5) indicates that "a record of current training, inclusive of the current two years, in accordance with this subpart, shall be created and retained by each hazmat employer . . .". This "record shall include certification that the hazmat employee has been trained and tested, as required by this subpart".

Contrary to the above, training records for individuals responsible for certifying the adequacy of radioactive material shipments did not include an employer certification that the individuals had been trained in accordance 49 CFR 172 Subpart H-Training.

Response

1. Reason for the Violation

Two individuals at PP&L are responsible for determining the acceptability of radioactive material shipments. These individuals, while not receiving the same training, were trained on aspects of radioactive material transportation. One individual received external training that, while not formally evaluated by PP&L or properly documented, was considered acceptable by the functional unit responsible for radioactive material shipments. No specific training requirements to 49CFR172 were understood to be necessary at the time this individual received training. Upon further evaluation it was determined that this training did not meet the requirements.

The second individual received training on August 25, 1994. This training, provided by an external organization, was acceptable to PP&L. The training, while properly documented in accordance with PP&L training program requirements was not evaluated to assure compliance with 49CFR172 training requirements. No evaluation to these requirements was performed by PP&L because information concerning this training, provided by the external organization conducting the training, was believed to be adequate and in compliance with the 49CFR172 regulations. Additionally, PP&L's training program for radioactive material transportation did not require that external training test records, as required by 49CFR172, be maintained. The omission of training test records occurred because of the use of an external organization to conduct the training.

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

- a. An evaluation was performed on the external training identified above that was completed on August 25, 1994. This evaluation determined that the training complied with the 49CFR172 requirements.
- b. The other individual responsible for radioactive material transportation and additional employees who perform radioactive material transportation activities completed training which complied with the requirements of 49CFR172.
- c. Nuclear Training Procedure NTP-QA-42.6 (Effluents Management Training and Certification Programs) was revised to incorporate the training and training program requirements of 49CFR172.

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

The actions in 2.c above were taken to avoid further violations; therefore, no additional actions are required.

4. Date of Full Compliance

Based on 2. above PP&L is in full compliance.

