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SUBJECT: Responds to NRC 980716 ltr re violations noted in insp repts  
           50-387/98-04 & 50-388/98-04. Corrective actions: basis  
           document for Bypass Indication Sys was developed &  
           historical review performed.

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**SUSQUEHANNA STEAM ELECTRIC STATION  
REPLY TO NOTICE OF VIOLATION**

(50-387/388/98-04-01)

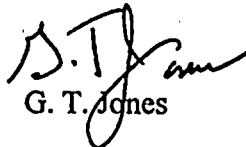
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Docket Nos. 50-387  
and 50-388

This letter provides PP&L's response to NRC Notice of Violation 50-387/388-98-04-01 (Attachment 1), which was contained in NRC Inspection Report 50-387/98-04 and 50-388/98-04, transmitted by NRC letter dated July 16, 1998. We trust that the NRC will find the attached responses acceptable. If you have any questions, please contact Mr. J. M. Kenny at (610) 774-7535.

Sincerely,

  
G. T. Jones

Attachment

copy: NRC Region I  
Mr. K. M. Jenison, NRC Sr. Resident Inspector  
Mr. V. Nerses, NRC Sr. Project Manager

IED 1/1

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PDR ADDCK 05000387  
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**REPLY TO NOTICE OF VIOLATION**

**Violation 50-387/388/98-04-01**

"10CFR 50.65(b) established the scope of the monitoring program for selection of safety-related and nonsafety related structures, systems, or components (SSCs) to be included within the scope of the maintenance rule program.

Contrary to the above, from July 10, 1996 to June 8, 1998, the licensee had failed to include in the scope of the Maintenance Rule program the Bypass Indication system which is a safety related display instrumentation system which provides the operator with information for normal plant operation and allows the operator to perform manual safety functions."

**Response to Violation 50-387/388/98-04-01**

**1. Reason for the Violation**

The Bypass Indication System (BIS) is identified as safety-related display instrumentation (non-NSSS) by SSES FSAR section 7.1.1b.4. When scoping for the maintenance rule was developed, the BIS was identified during the review of Q components; however, the safety-related display function was not recognized. During the review, the Q components in the system were determined to provide an electrical isolation function only. The isolators were considered to be adequately monitored because for maintenance rule purposes, they were monitored as part of the systems for which the isolation function existed. This position was presented to the Maintenance Rule Expert Panel at meeting 1998-0130 on 1/30/98 for consideration. The Expert Panel concurred with the basis for not including the BIS in scope. Therefore, the BIS was not added to scope of the maintenance rule at that time because the safety-related display function of the BIS was not considered in the decision. This oversight was the result of human error.

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

A basis document for the Bypass Indication System (BIS) was developed and a historical review performed. The BIS was added to the scope of the maintenance rule on 7/14/98 at Maintenance Rule Expert Panel meeting 1998-0714. The BIS was classified (a)(2) based on the results of the historical review. There were no adverse consequences resulting from the system not being included in the maintenance rule scope during the period the violation existed.



- Further, a review was conducted to identify other systems with Q components that were not included in the scope of the maintenance rule. Two additional systems were identified: System 77, Modular Control Room System, and System 66, Transient Monitoring System.

System 77 was determined not to be in the scope of the maintenance rule because it contains only control panels and termination cabinets that are monitored as part of the Control Structure Building System (System 12K). The functional components contained in the control panels and termination cabinets are not part of System 77. These components are monitored as part of the systems that the control panels support.

System 66, Transient Monitoring System (TMS), contains Q isolators which are adequately monitored since for maintenance rule purposes, they are monitored as part of the systems for which the isolation function exists. Failures of the isolators are only MRFFs if they impact the monitored system's functionality (i.e., RCIC, RHR, etc.). The TMS has no safety-related function. To avoid future confusion, change documents were submitted to re-assign the Q components in the Transient Monitoring System to the safety-related systems that they connect to. The database changes are complete. Based upon this action, the Transient Monitoring System is not in the scope of the maintenance rule.

The results of the above described review were discussed at Maintenance Rule Expert Panel meeting 1998-0825. The panel concurred with the results of the review.

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

No further action is required to avoid further violations.

**4. Date of Full Compliance**

SSES was in full compliance on 7/14/98. On this date, the BIS was added to the Maintenance Rule scope and classified (a)(2).

