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 50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylva      05000388

AUTH. NAME      AUTHOR AFFILIATION  
 KEISER, H.W.      Pennsylvania Power & Light Co.  
 RECIPIENT NAME      RECIPIENT AFFILIATION  
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SUBJECT: Responds to NRC 920222 ltr re violations noted in Insp Repts  
 50-387/90-81 & 50-388/90-81. Corrective actions: AD-QA-101,  
 "Procedure Program" revised to require periodic review of  
 procedure format & content & industry experience.

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**Pennsylvania Power & Light Company**

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MAY 15 1992

Harold W. Keiser  
Senior Vice President-Nuclear  
215/774-4194

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

**SUSQUEHANNA STEAM ELECTRIC STATION**  
**REPLY TO NOTICE OF VIOLATION**  
**DATED FEBRUARY 22, 1991**  
**PLA-3766** FILE R41-2

Docket Nos. 50-387  
and 50-388

Attached is Pennsylvania Power & Light Company's revised response to Violation Number 3 to the Notice of Violation dated 2/22/91 resulting from Inspection Nos. 50-387/90-81 and 50/388/90-81. Pennsylvania Power & Light Company has accepted the violation.

The notice required submittal of written reply within 30 days of the date of the letter. Our initial response was provided on March 28, 1991. As a result of a follow up inspection to the Maintenance Team Inspection conducted March 16-27, 1992, we have agreed to revise our response to Violation No. 3.

If you have any questions, please contact Mr. W.W. Williams at (215) 774-5610.

Very truly yours,

H. W. Keiser

Attachment

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cc: NRC Document Control Desk (original)  
NRC Region I  
Mr. G. S.Barber, NRC Sr. Resident Inspector  
Mr. J. J.Raleigh, NRC Project Manager

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**AFFIDAVIT**

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**COMMONWEALTH OF PENNSYLVANIA )**  
**COUNTY OF LEHIGH )** : SS

I, HAROLD W. KEISER, being duly sworn according to law, state that I am Sr. Vice President - Nuclear of Pennsylvania Power & Light Company and that the facts set forth on the attached response to Notice of Violation to NRC Combined Inspection Report Nos. 50-387/90-81 and 50-388/90-81 are true and correct to the best of my knowledge, information and belief.

*H. Keiser*

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Harold W. Keiser  
Sr. Vice President - Nuclear

Sworn to and subscribed  
before me this 15<sup>th</sup> day  
of May, 1992.

*Martha C. Sedora*

Notarial Seal  
Martha C. Sedora, Notary Public  
Allentown, Lehigh County  
My Commission Expires Jan. 15, 1994  
Member, Pennsylvania Association of Notaries

## REPLY TO A NOTICE OF VIOLATION

### A. Violation

Technical Specification 6.8.1 states: "Written procedures shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978."

Regulatory Guide 1.33 states "comply with the 'requirements' of ANSI N18.7-1976/ANS-3.2."

ANSI N18-7-1976/ANS-3.2, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," paragraph 5.2.15, requires that plant procedures shall be reviewed by an individual knowledgeable in the area affected by the procedure no less frequently than every two years to determine if changes are necessary or desirable. Paragraph 3.2 requires persons or organizations performing functions of assuring that the administrative controls and quality assurance program is established and implemented or of assuring that an activity has been correctly performed shall have sufficient authority and organizational freedom to identify quality problems. Additionally, it requires that the verification of conformance to established program requirements is accomplished by a qualified person who does not have responsibility for performing or directly supervising the work.

Contrary to the above, during the period October 1988 to October 1990, required procedural reviews and verification of approximately 2,000 Unit 1 and 2 procedures, including safety related maintenance procedures, surveillance procedures and checklists were conducted, but were not accomplished with independent personnel not having responsibility for performing or directly supervising the procedure.

### Response

#### 1. Reason for the Violation

Pennsylvania Power & Light Company agrees that the periodic procedural reviews conducted during the period October 1988 to October 1990 were not accomplished in accordance with the intent of ANSI N18.7-1976. PP&L's practice of using step-by-step procedure performance to accomplish the periodic reviews represented only a review of the implementation of the technical aspects while other aspects (e.g., consistency with other new or revised procedures, industry events, etc.) were not considered.

Pennsylvania Power & Light Company believes that compliance with the requirements of

Paragraph 3.2 of ANSI N18.7-1976 is achieved by the Quality Verification function of the Nuclear Quality Assurance organization through the performance of audits and surveillances. Quality Verification personnel are independent of the activity they are evaluating (i.e., they are qualified individuals who do not have responsibility for performing or directly supervising the work). PP&L does not believe that the independence provision of Paragraph 3.2 is to be extended to the periodic review requirement of Paragraph 5.2.15. Our periodic reviews are accomplished using a person "knowledgeable" in the area affected by the procedure being reviewed.

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

AD-QA-101, "Procedure Program", was revised to require that the periodic review include a review of procedure format and content, controls and hierarchy assuring consistency with applicable governing procedures and confirmation of correct scope, applicable industry experience, applicable SSES events, etc. The revision, issued 3/21/91, eliminated taking credit for accomplishing the periodic review solely on the basis of a step-by-step performance of the procedure. PP&L believes this position is consistent with the guidance of ANSI N18.7-1976, paragraph 5.2.15.

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

To further enhance the "Procedure Program" procedure and to ensure the performance of adequate technical and administrative reviews, the scope covered by the Periodic Review Form of the procedure will be broadened to include applicable industry and SSES events. This revision will be completed by June 30, 1992.

4. Date of Full Compliance:

PP&L has been in full compliance since AD-QA-101 was revised on 3/21/91.