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MAR 0 3 1997

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
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Washington, D. C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION
REPLY TO A NOTICE OF VIOLATION
(50-387/96-13-01; 50-388/96-13-01 AND
50-387/96-13-02; 50-388/96-13-02)
PLA-4570 FILE R41-2

Docket Nos. 50-387
and 50-388

This letter provides Pennsylvania Power and Light Company's response to the Notice of Violation (50-387/96-13-01; 50-388/96-13-01 and 50-387/96-13-02; 50-388/96-13-02) contained in NRC Combined Inspection Report 50-387/96-13 and 50-388/96-13 dated January 29, 1997.

The notice requires submittal of a written reply within thirty (30) days of the date of the letter. However, as discussed with Dr. Walter J. Pasciak of NRC Region I on February 27, 1997, PP&L has been authorized to delay the response until March 7, 1997. We trust that the Commission will find the attached response acceptable.

If you have additional questions, please contact Mr. R. D. Kichline at (610) 774-7705.

Very truly yours,

R. G. Byram

Attachment

copy: NRC Region I
Mr. K. Jenison, NRC Sr. Resident Inspector
Mr. C. Poslusny, Jr., NRC Sr. Project Manager

Distribution w/cy of Licensee's Response Letter:
Region I Docket Room (with concurrences)
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Inspection Program Branch (IPAS)

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IE01

REPLY TO A NOTICE OF VIOLATION

Violation A (50-387/96-13-01; 50-388/96-13-01)

10 CFR 50, Appendix B, Criterion XVI, "Corrective Action," requires licensees to assure that conditions adverse to quality, such as deficiencies and nonconformances, are promptly identified and corrected. In the case of significant conditions adverse to quality, the licensee shall assure that the corrective action is taken to preclude repetition.

PP&L Nuclear Department Administrative Procedure NDAP-QA-0702, "Condition Reports," Revision 1, provides the program for identification, reporting, evaluating, and correcting conditions adverse to safety or quality.

Contrary to the above, on July 10 and December 9, 1996, PP&L failed to prevent the recurrence of a nonconforming condition created by workers blocking open a high energy line break room boundary door during on-line maintenance. The Condition Report actions for a previous occurrence, on June 19, 1996, did not result in effective corrective actions to prevent the subsequent events.

Response

1. **Reason for the Violation**

   The violation occurred due to the failure to adequately communicate station guidance that HELB doors must remain closed pending establishment of proper administrative controls on their use. PP&L's response to the events of June 21 and July 10 was focused on the engineering evaluations necessary to establish these controls. These evaluations required engineering calculations of every HELB door at the station. After the July 10 event, action was taken to provide interim controls by retracting existing guidance pending completion of the engineering work; however, this action was not adequately communicated to affected station personnel.

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

   a) Upon identification of the noncompliances on July 10, 1996, and December 9, 1996, the HELB doors were closed.

   b) Following the event on December 9, 1996, an "all station personnel" letter dated December 12, 1996, was issued. Reading of this letter was required as "stand down" training. Since issuance of that letter, which discussed the control of station doors, no HELB door violations of the station door policy have been identified.

   c) The responsibility for station HELB doors has been consolidated under the site engineering organization. This assignment provides a focal point for control of station doors.

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

A broad review of control of all station doors including HELB doors is being performed. This review has evaluated Condition Report corrective actions associated with blocked open station doors, station policy concerning station doors, and the dissemination of information related to station doors. Recommendations from this review are currently being evaluated. This review is expected to further enhance our control of HELB doors.

4. **Date of Full Compliance**

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

Violation B (50-387/96-13-02; 50-388/96-13-02)

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 states that procedures for the control of maintenance, repair and replacement of safety related equipment including, a method for obtaining permission and clearance for operation personnel to work and for logging such work, should be covered by written procedures.

PP&L Nuclear Department Administrative Procedure NDAP-QA-322, Permit and Tag, implements the tagging process at Susquehanna. Section 5.5. of NDAP-QA-322 defines a foreign potential as an energy source applied within the boundary of a blocked out system. Section 6.2.3 states that the system operating (SO) representative, system permit supervisor and all sign-ons shall be notified by the person performing a foreign potential test and given their approval prior to application of the foreign potential. It further states that proper documentation shall be noted on the Permit Status Change Log, form NDAP-QA-0322-6.

Contrary to the above, on November 14, 1996, 110 Vac power (a foreign potential) was brought inside the boundaries of permit 1961264, Standby Gas Treatment System 07553A damper actuator, without the proper approvals and documentation.

Response

1. **Reason for the Violation**

   The violation occurred because the work practice at the time identified a power source as a "foreign potential" only if the potential existed to backfeed power into the circuit. This potential did not exist since the circuit (damper actuator) was de-terminated (power removed). Therefore, the appropriate authorizations to apply a foreign potential, required by the procedure, were not incorporated into the permit. Upon further review, PP&L has determined that this work practice is inconsistent with the intent of the Permit and Tag procedure. No personnel safety hazard existed as a result of this event.

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

   a) The concern related to the introduction of a foreign potential into a blocking boundary was identified after the work on the dampers was completed; therefore, no corrective action associated with the work activity was required.

   b) Tailboard training was conducted with Electrical Maintenance personnel stressing the importance of identifying the introduction of a foreign potential in a blocking permit and adherence to the permit and tag procedure.

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

a) Damper actuator work plans/procedures will be revised to annotate that utilization of power sources, other than permanent plant power, is a foreign potential. By annotating the appropriate work plans/procedures, the significance associated with the introduction of a foreign potential into a blocking boundary is enhanced. These work plans/procedures are scheduled to be revised by April 1, 1997.

b) The issues related to this event and the associated corrective actions will be incorporated into Licensed Operator training as part of the Manager of Operations Agenda training. This training will be completed by June 14, 1997.

4. **Date of Full Compliance**

Based on 2.a above PP&L is in full compliance, in that compliance was achieved upon removal of the foreign potential at the completion of the work activity.