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SUBJECT: Responds to NRC 970930 ltr re violations noted in insp repts  
50-387/97-80 & 50-388/97-20. Corrective actions: TSIs  
1/2-94-007 were deleted on 971002. PP&L will submit change to  
improved TSS to delete ref to svc platform hoist interlock.

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U. S. Nuclear Regulatory Commission  
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SUSQUEHANNA STEAM ELECTRIC STATION  
REPLY TO NOTICE OF VIOLATION  
50-387/388-97-80-01  
PLA-4791 FILE R41-2

Docket Nos. 50-387  
and 50-388

This letter provides PP&L's response to NRC Notice of Violation 50-387/388-97-80-01, which was contained in NRC Inspection Report 50-387/97-80, 50-388/97-80, dated September 30, 1997. We trust that the NRC will find the attached response acceptable. If you have any questions, please contact Mr. J. M. Kenny at (610) 774-7535.

Sincerely,

A handwritten signature in dark ink, appearing to read 'G. T. Jones', is written over the typed name.

G. T. Jones

Attachment

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

IEDU/

9711100091 971103  
PDR ADDCK 05000387  
G PDR



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**REPLY TO NOTICE OF VIOLATION 97-80-01****NRC Statement of Violation**

10 CFR 50, Appendix B, Criterion XVI, "Corrective Action," requires, in part, that "...measures shall be established to assure that "conditions adverse to quality....are promptly identified and corrected."

On January 7, 1997, Pennsylvania Power and Light Company (PP&L) completed a review of Technical Specification Interpretations to remove interpretations that were less conservative than the Technical Specifications. The results of this review were documented in Condition Report 96-1975 which indicated that the remaining Technical Specification Interpretations would not allow action less conservative than the Technical Specifications.

Contrary to the above, conditions adverse to quality were not promptly corrected in that from January 7, 1997, to August 8, 1997, (the date of the NRC Operational Safety Team Inspection exit meeting). PP&L had two Technical Specification Interpretations in place that were less conservative or had changed plant Technical Specifications as evidenced by the following examples:

- 1) TSI 1-94-007 which clarified TS 3.9.1, "Reactor Mode Switch" deleted surveillance requirements to test interlocks associated with the fuel grapple position and fuel service platform.
- 2) TSI 1-94-005 which clarified TS 3.3.7.5, "Accident Monitoring Instrumentation," incorrectly deleted a requirement to have a recording device operable for pressure and level monitoring instruments.

**PP&L Response****1. Reason for the Violation****TSI 1/2-94-007**

Technical Specification Interpretations TSI 1/2-94-007 involved two reactor mode switch interlocks which were listed in the original Technical Specifications, but never used at Susquehanna SES. The first interlock, "fuel grapple position" does not exist; i.e., there is no physical provision for a signal to feed into the mode switch; it therefore cannot be utilized. The second interlock, "service platform hoist fuel-loaded" physically exists, but the platform is not equipped with any fuel hoists, and is therefore not utilized. Based on the above, implementation of these interpretations was not safety-significant.



This TSI was created to document that the surveillance requirements in Specification 3/4.9.1 were not required to be performed for the two interlocks in question, based on their status as described above. It was believed that LCO 3.9.1b only applied to those interlocks listed that were actually utilized; it states:

“CORE ALTERATIONS shall not be performed using equipment associated with a Refuel position interlock unless at least the following associated Refuel position interlocks are OPERABLE for such equipment.”

Although PP&L is not contesting this violation, we believe that the words “using equipment associated with a Refuel position interlock” do not apply to the two interlocks in question, since one is not used and the other does not exist. Further, the wording stipulates that the listed interlocks must be “OPERABLE for such equipment,” indicating from our perspective that Operability is conditional, based on the use of equipment associated with the interlocks. Finally, the associated action (c) and surveillance requirements (4.9.1.2 & 3) are stated in terms of the “required Refuel position equipment interlocks” and “required reactor mode switch Refuel position interlocks,” which were also interpreted consistent with the above perspective on the LCO.

PP&L believes that this interpretation was conservative; however, we also concur that a Technical Specification change should have been pursued to resolve the discrepancy, which did not reflect the actual design and operation of Susquehanna.

Inspection Report 97-80 also opined that:

“In some instances it did not appear PP&L had rigorously reviewed the current TSIs and adequately incorporated those interpretations into the ITS submittal to the NRC.” “Specifically in the ITS submittal to the NRC, TS 3.9.1 ‘Refueling Equipment Interlocks,’ specified a channel functional test must be performed on the service platform hoist fuel-loaded interlock. However, TSI 1-94-007 indicated this surveillance was not required.”

PP&L did review this TSI in support of the Improved Technical Specifications (ITS) submittal. It was left in the ITS because unlike the fuel grapple position interlock, it physically existed, and was in our view required to be left in the ITS submittal as a refueling interlock until a modification was performed to delete it.

**TSI 1-94-005**

PP&L concurs that this interpretation was inappropriate. The reason for the violation was human performance, in that inadequate research was done to support the interpretation. The TSI focused on the adequacy of the accident monitoring channels in question to provide information, and neglected to consider that:

- a single failure of the redundant channel would impact the ability to trend data with safety-related equipment, and
- PP&L commitments to Regulatory Guide 1.97 required dedicated recorders for the monitoring channels in question.

The safety significance of TSI 1-94-005 was low based on the fact that the pressure and level instrumentation in question remained capable of performing its specified function, and only the recorder chart drive was not functional. Specific compensatory actions were required by the TSI to ensure the continued availability of this information. Further, the redundant channel, including dedicated recorder, was fully operable while the recorder in question was not functional. Finally, this instrumentation performs solely a monitoring function in support of supplying information to the operator. It has no active functions designed to change the state of safety-related structures, systems, or components.

It should be noted that an opportunity to use this TSI arose prior to the identification of the NRC violation. PP&L independently determined that it should be deleted, and was in the process of deleting it when the NRC identified it as a deficiency.

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

- a. TSIs 1/2-94-007 were deleted on October 2, 1997. Administrative controls are in place which ensure that Core Alterations cannot commence until the disposition of Item 3.b below.
- b. TSI 1-94-005 was deleted on August 4, 1997.
- c. The findings of the NRC Notice of Violation have been reviewed with appropriate individuals that were involved in the origination of these interpretations, in order to avoid similar problems in the future based on lessons learned.



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

- a. As previously committed in response to NRC Inspection Report 50-387/388-97-04 (ref. PLA-4666, G. T. Jones to US NRC, "Reply to a Notice of Violation," dated September 4, 1997), PP&L "...will re-review all documented interpretations of Technical Specifications for compliance issues and take the appropriate action upon identifying any deficiencies." This review will be completed by November 21, 1997.
- b. PP&L will submit a letter to the NRC to propose an appropriate course of action to disposition the two interlocks that are the subject of TSI 1/2-94-007 with respect to the current Technical Specifications. If required, by December 12, 1997 PP&L will submit a change to the current Technical Specifications for both units to delete them. Based on the NRC interpretation provided in the Notice of Violation, this change would have to be approved by the NRC prior to the commencement of Core Alterations in the upcoming Spring 1998 Unit 1 10th Refueling and Inspection Outage.
- c. The following actions will be completed prior to NRC approval of the PP&L submittal on Improved Technical Specifications:
  1. PP&L will document disposition of all current Technical Specification interpretations.
  2. PP&L will submit a change to the Improved Technical Specifications to delete reference to the service platform hoist interlock.

**4. Date of Full Compliance**

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

10-1-10

