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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**  
(50-387/388-98-08-02)  
PLA-4975 FILE R41-2

Docket Nos. 50-387  
and 50-388

This letter provides PP&L's response to NRC Notice of Violation 50-387/388-98-08-02 which was contained in NRC Inspection Report 50-387/98-08, 50-388/98-08, transmitted by NRC letter dated August 6, 1998.

The NRC letter that transmitted NRC Inspection Report 50-387/98-08, 50-388/98-08, also requested that PP&L "confirm that the PP&L 50.59 safety evaluation process has the necessary provisions to assure that in future modifications that create a condition that would cause technical specifications to be non-conservative, PP&L would obtain NRC approval prior to implementation of the modification. In addition, [PP&L was] requested to identify and evaluate any similar occurrences, where a license amendment submittal has not already been made, where administrative controls are being used to supplement technical specification requirement because the technical specification requirement is either non-conservative or insufficient to verify compliance with the associated design basis."

In response to the NRC concerns, PP&L hereby confirms that our 50.59 safety evaluation process and other administrative processes currently in effect contains the necessary provisions to assure that the technical specifications will be considered for future modifications to determine if a technical specification non-conservatism exists. If a non-conservatism were identified PP&L would evaluate the non-conservatism to determine if a Technical Specification change is required, and take appropriate action. In addition, PP&L has performed a review to determine if other occurrences exist where modifications were implemented, where a Technical Specification changes was required prior to implementation, but not obtained. No occurrences were identified.

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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,



G. T. Jones

Attachment

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



**REPLY TO NOTICE OF VIOLATION**

**Violation (50-387/98-08-02; 50-388/98-08-02)**

10 CFR 50, Appendix B, Criterion XVI requires, in part, that measures be established to assure that conditions adverse to quality, such as nonconformances, are promptly identified and corrected.

Contrary to the above, between August 1990 and June 30, 1998, PP&L failed to effect timely resolution of a nonconformance involving the fuel oil transfer system for the emergency diesel generators. Specifically, in August 1990, in Non-Conformance Report 90-0173 and in April 1991, in PP&L engineering study SEA-ME-332, PP&L identified the fuel oil transfer pump automatic start level-switch setpoints in the emergency diesel generator day tanks did not meet the American National Standards Institute (ANSI) requirement, as referenced by the Technical Specification bases and the Final Safety Analysis Report, to ensure a day tank minimum fuel oil volume, at the level where fuel oil is automatically added to the day tank, sufficient for 60 minutes of emergency diesel generator operation at rated load plus a 10% margin. The fuel oil transfer pump automatic start level-switch setpoints that existed in April 1991 were not changed to meet the ANSI requirements.

**Response**

*For additional information see NRC Special Inspection Report 50-387/98-08, 50-388/98-08, dated August 6, 1998 which contains PP&L document titled "Evaluation of NRC Questions on Emergency Diesel Generator Fuel Oil Day Tanks," dated July 1, 1998.*

**1. Reason for the Violation**

PP&L concurs that our actions to resolve the deficiency related to compliance with ANSI N195-1976, with respect to the emergency diesel generator (EDG) fuel oil day tanks volumes, were neither aggressively pursued nor resolved in a timely manner. For a detailed description of the issue, an associated timeline of actions taken, and a determination that the issue was not safety significant, see the PP&L document identified above.

Based upon PP&L's interpretation of ANSI N195-1976, we considered the administrative controls put in place in 1990 to be adequate to address the Technical Specification concern associated with the EDG fuel oil day tank volumes. On this basis, we treated the Technical Specification change as a long term enhancement rather than a required corrective action. It became a priority during the project to convert to the Improved Technical Specification (ITS), because of an explicit objective to resolve the need for Technical Specification interpretations. An exception to the ANSI standard was proposed



in PP&L's August 1996, ITS submittal, but was subsequently withdrawn due to questions raised that ultimately resulted in issuance of this violation.

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

Current administrative controls on the fuel level in the EDG day tanks will remain in effect until a Technical Specification change is approved (see 3. below). Based upon NRC's safety determination which concluded that the issue is considered negligible from a PRA core damage perspective, as documented in NRC Special Inspection Report 50-387/98-08 and 50-388/98-08, PP&L considers this interim corrective action to be appropriate and also protects the health and safety of the public.

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

Due to the lack of safety significance associated with the specific ANSI standard guidance in question, PP&L will propose a Technical Specification change to modify the Technical Specification requirements for the EDG day tank fuel oil volumes. The proposed Technical Specification amendment was determined to be the most effective corrective action to resolve the concern.

**4. Date of Full Compliance**

PP&L will be in full compliance upon completion of NRC's review of the proposed Technical Specification change. This change will be submitted by October 16, 1998.

