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 RAM, R.G.      Pennsylvania Power & Light Co.  
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SUBJECT: Forwards response to NRC 960409 ltr re violations noted in  
 insp rept 50-388/96-01.C/A: status of damper was investigated  
 & damper was adjusted.

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**Pennsylvania Power & Light Company**

Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

Robert G. Byram  
Senior Vice President-Nuclear  
610/774-7502  
Fax: 610/774-5019

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

(50-388/96-01-01)

PLA-4457

FILE R41-2

Docket No. 50-388

This letter provides Pennsylvania Power & Light Company's response to the Notice of Violation (50-388/96-01-01) contained in NRC Combined Inspection Report Nos. 50-387/96-01 and 50-388/96-01 dated April 9, 1996.

The notice required submittal of a written reply within thirty (30) days of the date of the letter. We trust that the commission will find the attached response acceptable.

If you have any additional questions, please contact Mr. C. T. Coddington at (717) 542-3289.

Very truly yours,

  
R. G. Byram

Attachment

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

9605140395 960509  
PDR ADOCK 05000388  
G PDR

*Handwritten initials/signature*

REPLY TO NOTICE OF VIOLATION

Violation (388/96-01-01)

10 CFR 50, Appendix B, Criterion XVI, "Corrective Action," requires licensees to assure that conditions adverse to quality, such as failures and malfunctions, are promptly identified and corrected. PP&L's Nuclear Department Administrative Procedure NDAP-QA-0702, "Condition Reports," Revision 1, requires identification of conditions that could affect the ability of the station to operate within the conditions of the operating license.

Contrary to the above, on February 15, 1996, the licensee failed to promptly identify that secondary containment damper HD-27564A was not fully closing during a Technical Specification surveillance test and returned it to service. Although the damper failed to close on three successive attempts during the surveillance, no Condition Report was initiated and corrective action was not taken prior to returning the damper to service. On February 16, 1996, damper HD-27564A failed to close on a signal from the control room.

Response

*Reference LER 50-388/96-002-00 for more details concerning this event.*

1. Reason for the Violation

The reason for the failure to promptly identify that secondary containment isolation damper HD-27564A was not fully closing during a Technical Specification surveillance test can be attributed to the following:

- a. A previous indication that the damper was not operating smoothly, that was documented in a work authorization package, was not recognized as a symptom of faulty damper operation. In closing the work package the damper operated satisfactorily; therefore, the significance of the lack of ideal operation was not considered or evaluated by the maintenance or operations organizations and no condition report was initiated.
- b. The operating crew concluded that the damper dual indication, identified on February 15, 1996, was a limit switch problem without verifying if the limit switch was faulty. This was a result of the operator seeing a change in building differential pressure during the surveillance. Consequently, Operations supervision did not take action to ensure that they knew everything that had happened during the damper surveillance on February 15, 1996.
- c. The operators did not have clear understanding of what constitutes a failure of a surveillance (ie: the expectation that the equipment must operate properly the first time the surveillance is performed).

- d. The crew performing the surveillance did not clearly communicate the pertinent information on the damper and surveillance status among themselves and as a result Operations supervision did not fully understand what was done with the damper. Therefore, Operations supervision had no reason to suspect a problem with damper operation.

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

- a. Upon receiving dual indication for Damper HD-27564A on February 16, 1996, the status of the damper was investigated and the damper was adjusted. The surveillance was reperformed and the damper restored to operability.
- b. The appropriate Operational procedures have been revised to clearly state that surveilled equipment must meet acceptance criteria on the first attempt.
- c. The appropriate Maintenance standards have been revised to include the expectation that when a job is completed, the component is restored to a 'like new' condition. Operations and Maintenance supervision are expected to concur with the as left condition and an operability impact is to be evaluated for any deviations from a 'like new' condition.

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

The Operations shifts will be briefed on this event during Requalification Training. This briefing will include:

- a. The expectation that in order to successfully perform a surveillance, the equipment must operate properly the first time.
- b. The necessity for follow up and full understanding of the actions taken on equipment and the effect of those actions on operability.
- c. The expectations for unit supervisor review of work authorizations.
- d. The necessity for full communication of information among the operating crew regarding equipment that is not operating normally.

4. *Date of Full Compliance:*

Based on (2) above PP&L is in full compliance.