

# CATEGORY 1

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AUTH. NAME: BYRAM, R.G.      AUTH. AFFILIATION: Pennsylvania Power & Light Co.  
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SUBJECT: Responds to NRC 970623 ltr re violations noted in insp rept 50-387/97-03. Corrective actions: will change quarterly flow surveillances for Core Spray to eliminate listed procedural steps & will add Precaution to Core Spray surveillance.

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SUSQUEHANNA STEAM ELECTRIC STATION  
REPLY TO A NOTICE OF VIOLATION  
(50-387/97-03-02)  
PLA-4677 FILE R41-2

Docket No. 50-387

- References: 1) PLA-4644, R.G. Byram, "Reply to a Notice of Violation (50-387/97-03-01, 50-388/97-03-01; 50-387/97-03-02 and 50-387/97-03-04, 50/388/97-03-04)," dated August 6, 1997.  
2) Letter, C.W. Hehl to R.G. Byram dated August 26, 1997.

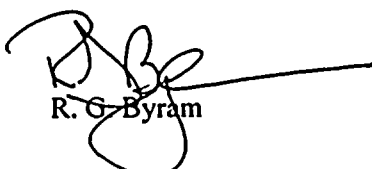
The purpose of this letter is to provide PP&L's revised response to the Notice of Violation (50-387/97-03-02) contained in NRC Integrated Inspection Report 50-387/97-03 and 50-388/97-03 dated June 23, 1997.

In Reference #1, PP&L provides the basis for disputing the violation concerning the validity of surveillance test results for the core spray pumps as a result of vent and fill evolutions contained in operating procedures. Reference #2 contains the result of NRC's review of Reference #1 and conclusion that the benefit of venting standby systems prior to as found surveillance testing was not justified in this case.

After further review, PP&L has chosen not to contest this violation. Reference #2 requested a response within 20 days of the date of that letter. Based on a conversation with Mr. Clifford Anderson of NRC Region I, it was noted that the letter was not received by PP&L until September 3, 1997. As a result, PP&L has been authorized to delay the response until September 23, 1997. We trust that the Commission will find the attached response acceptable.

If you have additional questions, please contact Mr. J. M. Kenny at (610) 774-7535.

Very truly yours,

  
R. G. Byram

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PDR ADOCK 05000387  
Q PDR



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Leo



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

**REPLY TO A NOTICE OF VIOLATION****Violation 2 (387/97-03-02)**

10 CFR Appendix B, Criterion XI, Test Control, requires, in part, that the licensee establish a test program to assure that testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed according to written test procedures that include provisions for suitable environmental conditions.

Contrary to the above, on April 24, 1997, the Unit 1 Core Spray System Division I quarterly surveillance test procedure, SO-151-A02, specified that operators vent the core spray pumps prior to starting them in order to verify operability. This activity results in the Core Spray pumps being tested in a condition that was different from the as-found condition, thereby potentially affecting the validity of the surveillance test results.

**Response**

PP&L chooses not to contest this violation.

**1. Reason for the Violation**

PP&L's core spray system is designed to avoid air intrusion. The core spray pumps are physically located so that they are water filled by suppression pool water and a "keepfill" system is utilized to assure interconnecting piping at elevations higher than the suppression pool are maintained water filled. As an additional precautionary step, our operating procedures require checks to confirm that the system piping is filled by the process fluid prior to routine starting of the pumps including performing vent and fill procedural steps. As documented by the NRC, we recognize the potential exists for such actions to have resulted in uncontrolled venting which may invalidate the required surveillance test. However, we do not concur that such steps have resulted in preconditioning the system as our design precludes the existence of air nor do we have any reason to believe that prior surveillance tests have been invalidated.

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

1. PP&L commits to change the quarterly flow surveillances for Core Spray to eliminate the procedural steps to:
  - a. confirm the Core Spray system filled and vented in accordance with OP-1(2)51-001.
  - b. vent the pump by opening the pump vent valve until air free water flows out.

2. PP&L will change the quarterly flow surveillances for Core Spray to add a Precaution that states that the system shall not be vented or checked vented prior to performance of the surveillance test. These changes will be completed before performance of the next quarterly flow surveillance for core spray.

Such actions will be completed prior to the next quarterly flow surveillance.

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

1. PP&L will review the remaining ECCS quarterly flow surveillances to determine the need for similar changes. Any changes found to be necessary will be completed by October 24, 1997.
2. PP&L is developing procedural guidance to address the issues of preconditioning identified in IN 97-16. Our procedural guidance will be issued by October 17, 1997. Once our procedural guidance is issued, a review of existing surveillance tests will be performed to identify any potentially un-acceptable preconditioning. This review will be completed by December 5, 1997.

**4. Date of Full Compliance**

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