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 RECIP. NAME: REGION 1, Philadelphia, Office of the Director

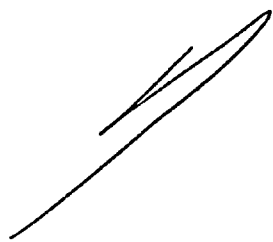
SUBJECT: Interim deficiency rept re violation of separation criteria for 4.16 kV switchgear. Problem may be generic. Followup rept to follow.

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 TITLE: Construction Deficiency Report (10CFR50.55E)

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Vice President-Engineering & Construction
821-5381

November 29, 1979

Mr. Boyce H. Grier
Director, Region I
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pennsylvania 19406

SUSQUEHANNA STEAM ELECTRIC STATION
INTERIM REPORT OF A DEFICIENCY REGARDING
VIOLATION OF SEPARATION CRITERIA FOR
4.16 KV SWITCHGEAR
ERs 100450/100508 FILE 840-4
PLA-426

Dear Mr. Grier:

This relates to a deficiency, reportable under the provisions of 10CFR50.55(e), which was identified to Mr. Robert Gallo, NRC Resident Inspector, by Mr. A. R. Sabol of PP&L during a telephone conversation on November 21, 1979. The deficiency involves separation criteria for vendor supplied electrical panels and switchgear.

Section 3.13.1 of the Susquehanna Steam Electric Station FSAR requires application of the electrical separation criteria of Regulatory Guide 1.75 Revision 1 (1/75) and commits to the use of IEEE Standard 384-1974.

MCAR-1-38 was written by Bechtel on October 12, 1979 as a result of NCR 4277. The nonconformance, which was discovered on August 1, 1979, relates to an apparent separation violation in the 4.16 KV Switchgear. The MCAR further documents the facts that although Electrical Separation Description Drawing E60 Rev. 4 was revised by DCN 1 (4/3/79) to require separation for cables terminated inside electrical equipment, similar separation requirements were not delineated or incorporated into project specifications to govern vendor wiring since the equipment had been fabricated and shipped to the jobsite.

PP&L has determined that the following conditions reported in MCAR-1-38 represent a deficiency reportable under 10CFR50.55(e):

1. Vendor wires for redundant DC Feeder Cables are run within six inches of each other in the 4.16 KV Switchgear 1A203 and 1A204.

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2. At various locations inside switchgear compartments, vendor wiring, vendor jumpers and field jumpers are bundled in common with Class 1E wiring of different divisions and/or Non-Class 1E wiring.

The potential generic problem involved is under review and will be evaluated by PP&L after Bechtel's evaluation is completed. The condition is deemed reportable for the following reasons:

1. The conditions represent a significant deficiency in final design as approved and released for construction such that the design does not conform to the criteria and bases stated in the FSAR. The equipment internal wiring does not conform with the separation criteria stated in FSAR Section 3.13.
2. The conditions, were they to have remained uncorrected, would have adversely affected the safety of operations of the nuclear power plant. A single event could have resulted in multiple failure within a Class 1E switchgear which could degrade two redundant Class 1E channelized battery systems.

A follow up letter will be submitted to identify the date by which a final definitive report will be provided.

Very truly yours,



N. W. Curtis
Vice President-Engineering & Construction

ARS:mcb

cc: Mr. Robert M. Gallo
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