



Pennsylvania Power & Light Company

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JUL 02 1982

Mr. Richard W. Starostecki
Director
Division of Project and Resident Programs
Region I
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

DESIGNATED ORIGINAL

Certified By

Marie C. [Signature]

SUSQUEHANNA STEAM ELECTRIC STATION
SALP RESPONSE
ER 100450 FILE 841-04
PLA-1150

Docket Nos. 50-387
and 50-388

Dear Mr. Starostecki:

Pennsylvania Power & Light Co. would like to offer the following comments in response to the SALP report dated June 4, 1982 which was reviewed with your staff on June 17, 1982.

IV. PERFORMANCE ANALYSIS

1. Readiness for Operation

1.3 Operating Staff

a. Licensed Operators

Based on informal feedback from NRC, we believe that twenty-two personnel have qualified for an NRC operators license. Sixteen have qualified at the senior reactor operator level and six at the reactor operator level. Only one individual has failed. There are an additional sixteen candidates whose status is indeterminate pending the grading by the NRC of their retaken written examinations and/or further deliberation by the NRC regarding the results of their simulator or plant walk-through examinations. There are sufficient operators and simulator instructors already qualified to support Unit 1 fuel load and operation. We do not believe that the initial failure rate on the written examinations evidences any inadequacy in our operator training program.

b. Health Physics Staff

Seventeen additional Health Physics technicians are on site and have been integrated into the Health Physics organization. These contract personnel arrived prior to fuel load so as to allow adequate time for indoctrination/screening, formal training appropriate for their intended assignments, and in-plant orientation and familiarization. These personnel have been assigned responsibilities depending on their experience and the results of our examinations.

In addition to the above, three personnel with qualifications similar to those required for Radiation Protection Manager have been assigned to positions providing support and experience to the Health Physics organization.

Contract personnel assigned to technician positions average approximately thirty months each of applied radiation protection experience at nuclear power plants. Upon arrival on site, these personnel were administered the technician selection examination and were given formal training in subjects such as: General Employee Training, Respiratory Protection, Susquehanna Systems, Emergency Plan Implementing Procedures, and Health Physics procedures and instrumentation. Additionally, these personnel are receiving structured in-plant orientation/familiarization with emphasis on plant lay-out and equipment locations.

The contract personnel supplementing the nineteen permanent Health Physics personnel raise the fuel load staffing level to thirty-nine. The total number of personnel, their experience, training and qualifications provide the station with a strong Health Physics organization prepared to administer and implement the station's Health Physics program.

c. Chemistry Staff

Three additional Chemistry technicians are on site and have been integrated into the Chemistry organization. These contract personnel arrived prior to fuel load so as to allow adequate time for indoctrination/

screening, formal training appropriate for their intended assignments, and in-plant orientation and familiarization. These personnel will be assigned responsibilities based upon their experience and training.

The contract personnel have significant formal education and experience in the Chemistry field. Upon arrival on site, these personnel were given formal training in subjects such as: General Employee Training, Health Physics, Respiratory Protection, Susquehanna Work Practices, Station Administrative Procedures, Chemistry Procedures, and Emergency Plan Implementing Procedures. These technicians have been working with the permanent chemistry personnel in performing chemistry activities, e.g., laboratory analyses in support of the preoperational test program, and procedure verification.

At fuel load, the Chemistry organization will number eighteen personnel, including fourteen technicians.

The three contract personnel are assigned to Technician positions within the organization, supplementing our company technicians. The fuel load organization described above will receive additional chemistry support during fuel load and subsequent test program activities from three support organizations. Their combined support can supply two additional full time chemistry support personnel.

Supplementing the permanent organization personnel with qualified, experienced contract Chemistry personnel has provided the station with a strong Chemistry organization prepared to administer and implement the station's chemistry program.

1.6 Operations Procedures

a. Engineering-Plant Staff Interface

Engineering and Plant Staff have long established interfaces which have included Plant Staff review of original system level design documents. In 1978, a major step was taken when Nuclear Plant Engineering (Corporate Engineering) established a Resident Engineering Group permanently

located at the plant to support on-site needs and communications with Plant Staff. This plus other measures have been implemented to strengthen the interface between corporate engineering and the Plant Staff during the transition from the preoperational-construction phase to the operating phase. These measures will be expanded and improved upon to assure a strong engineering-Plant Staff communication interface.

Improved communications measures consisted of expansion of the formal and informal mechanisms previously utilized. Significant improvements included: expansion of the Test Review Committee (TRC) membership to include an engineering representative, increased engineering attendance at various site meetings, establishment of strong interfaces between engineering and senior site management, and the integration of two engineering representative into the Startup Test Group.

Formal communications interfacing the two organizations include Plant Modification Requests (PMR's), Nonconformance Reports (NCR's), Engineering Work Requests (EWR's), and Daily Reports. The Resident Engineering (on-site) personnel are presently concentrating on support needs of the unit in preoperational testing, including attending daily status meetings regarding preoperational test program activities and fuel load preparation. Engineering personnel from both the Resident Group and Corporate Engineering also participate in frequent site evaluation meetings wherein work-to-go on a system basis is assessed, tracked, and assigned.

Engineering personnel have been loaned to and integrated into the Startup Test Group to assist in implementing the Startup Test Program. Responsibilities include review of Startup Test Procedures and results, and providing technical resolution to encountered problems.

The measures described above form a solid basis from which a strong communications interface can be realized. The achievement of this strong interface has been identified as a major goal for our Nuclear Department.

1.9 Construction Completion

a. Punch List Status

A Composite Work List (CWL) has been generated to identify and track work-to-go on the project. The list has two major subsets, the Startup Work List (SWL), consisting primarily of items identified during the preoperational test program, and a Project Work List (PWL) consisting primarily of items identified during post-preoperational testing. Both hardware and software items are entered on the list.

Items on the list are reviewed and an assessment is made regarding each item's importance as related to fuel load. Items assessed as not being required or desirable for fuel load are evaluated by Corporate Engineering, Licensing, and Operations. Based on safety, operability, and regulatory assessments, these items may then be deferred. For example, of 15 systems reviewed, there were 15 items per system required and scheduled for completion prior to fuel load and 5 items per system determined to be deferrable. For two thirds of the items required for fuel load, physical work was complete and only paper close-out remained.

The CWL establishes a positive management control mechanism for assuring that the requisite work is completed prior to fuel load.

b. Region I Open Items

Significant progress has been made in resolving Region I open items. As of July 1, the following numbers of open items required resolution before fuel load: 6 Violations (3 are ready for NRC review), 16 TMI items (10 are ready for NRC review), 12 CDR's (5 are ready for NRC review), 12 IEB's/IEC's (8 are ready for NRC review), and 77 other items (56 are ready for NRC review). There are also 9 new potential CDR's. The increase in other items reflects the more than 50 new items provided in NRC inspection reports issued since May 26, 1982. Several of these reports covered inspections performed much earlier this year.

We believe that these items can be resolved in time to support a July 15 fuel load date. Quality remains our first and highest priority and will not be sacrificed under any circumstances. Strong management attention has been provided to ensure that items are completed not only quickly, but correctly.

3. Preoperational Testing/Startup Testing

3.2 Preoperational Test Adequacy

Two major actions have been implemented to assure that commitments have been incorporated into the preoperational test program and that acceptance criteria have been verified within the test program.

The first action was to conduct a detailed review of FSAR chapter 14.2, Initial Tests Program, to assure that the chapter accurately described the test program.

The second action has been to have an outside group conduct a review/analysis of the FSAR test requirements, and the associated preoperational test program documentation, so as to assure that the commitments have been met. FSAR chapters 4 through 9, 10.3, 11.2, 11.3, 18, and responses to series #423 questions were reviewed, and approximately 3,000 requirements/commitments identified. A matrix has been developed for analysis purposes, within which these requirements/commitments are referenced to the appropriate preoperational acceptance criteria.

In addition to the steps identified above, preoperational test procedures are being reviewed against FSAR requirements prior to submitting the procedures for Superintendent approval and again prior to test implementation. These reviews are in addition to those normally conducted by writers and reviewers of preoperational test procedures.

4. Emergency Preparedness

a. Pre-OL Requirements

In the Region I Confirmatory Action Letter dated May 24, 1982, the Emergency Team Appraisal identified nine issues and stipulated that these were required prior to fuel load. All of these are ready for NRC review. The NRC inspector has scheduled a site visit during the week of 6 July for the purpose of reviewing and closing-out these issues. A functional test of the prompt notification system was completed successfully as scheduled on June 4, 1982.

6. Electrical Power Supply and Distribution

a. Electrical Distribution Undervoltage

The potential electrical distribution deficiency referred to in the SALP report relates to the voltage problems discussed in several recent NRC meetings. The additional information requested during the PP&L/NRC meeting on May 24, 1982 was submitted on June 16, 1982. Discussions are continuing with NRC to resolve any questions concerning Unit 1 operation prior to fuel load.

b. Relay Coordination Study

Per telephone call with G. Rhoads, NRC, the review of the relay coordination study for Unit 1 was completed by NRC's Al Finkle on March 2, 1982. This item is closed for Unit 1.

8. Quality Assurance

8.3 Preoperational QA

a. CDR Closeout

The CDR tracking system has been corrected to ensure that construction deficiencies are not indicated as ready for close-out until work is completed. Only twelve CDR's remain, and five of these are ready for NRC review. Several new potential CDR's have also been identified. The large number of CDR's closed-out in the last 30 days has significantly reduced this as a potential obstacle to issuance of the license.

b. FSAR Discrepancies

We have recently submitted an amendment to the FSAR which corrected most of the identified discrepancies. Future amendments will correct additional discrepancies as they are discovered. The FSAR change process will also be used to update the FSAR to reflect the as-built condition of the plant.

8.4 Operations QA

a. QA Staff

Concerning the availability of sufficient QA staffing to provide comprehensive auditing and surveillance of preoperational testing and station operational activities, PP&L has determined that an onsite QA staff of one supervisor and ten technically skilled personnel is sufficient to provide the required quality assurance coverage of the identified station activities. This is an increase of six technically skilled personnel. As of June 21, 1982, ten of these positions had been filled. An individual has accepted an offer to fill the eleventh position with a planned starting date in August of this year. Procedure NQAP 12.1, "Surveillance of Operating Plant Activities," was issued for use on June 10, 1982.

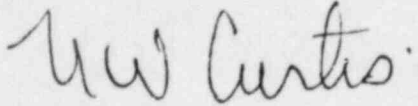
9. Licensing Activities

a. Outstanding OL Issues

As of July 1, 1982, only four of the seven principle outstanding issues identified in the SALP report remained which require resolution prior to fuel load. PP&L has provided all information requested by NRC for three of these and is waiting for a response. These issues are environmental qualification of electrical equipment, the gas line running near the site, and battery room area fire protection. Additional information will be

provided shortly on the remaining issue,
vital bus undervoltage.

Very truly yours,



N. W. Curtis
Vice President, Engineering & Construction-Nuclear

RMH/dmm

cc: G. Rhoads
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