

NOTICE OF VIOLATION

Pennsylvania Power and Light Company
Susquehanna Unit 1

Docket No. 50-387
License No. NPF-14
EA 94-022

As a result of an NRC review of the findings of an Augmented Inspection Team (AIT) inspection conducted on October 29 - November 9, 1993, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1993), the violations are set forth below:

A. Violation Related to Failure to Follow Procedures

Technical Specification 6.8.1.a requires that written procedures be established, implemented, and maintained covering the activities referenced in Regulatory Guide 1.33. Regulatory Guide 1.33 requires that refueling procedures, and procedures for maintenance and surveillance, be implemented. In addition, Technical Specification 6.8.1.b requires that written procedures be established, implemented, and maintained covering the activities referenced in refueling operations.

Precaution 6.2.1 of Susquehanna Nuclear Department Procedure OP-AD-107, Rev 1, "Removal of 1 or More Control Rod Drive Mechanism for Maintenance During Operational Condition 5," provides that with any control blade in the core fully withdrawn for maintenance, fuel movement is restricted to offload only, and only fuel movements from the core to fuel pool are permitted.

Section 6.13 of Susquehanna Nuclear Department Procedure NDAP-QA-0754, Rev 0, "Nonconformance Reports - Control and Processing," provides approved means to prevent inadvertent use of nonconforming items.

Contrary to the above, procedures were not adhered to during refueling operations, as evidenced by the following examples:

1. On October 6, 1993, fuel bundle 31-56 was incorrectly removed from the core and subsequently replaced in its core location. Thus, this movement was contrary to OP-AD-107, Rev 1, because it was not a movement from the core to the fuel pool.
2. On October 5, 1993, the Unit 1 grapple was replaced with a spare grapple that was procured as "non-Q" and had not been dedicated prior to use. Nonconformance Report NCR 93-112 had been previously written to document this condition. However, this grapple was placed into use without disposition of NCR 93-112 which was contrary to Section 6.13 of NDAP-QA-0754. (01013)

B. Violation Related to Ineffective Corrective Action

10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Actions," requires, in part, that in cases of significant conditions adverse to quality, measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

Contrary to the above:

1. On September 20, 1986; September 27, 1987; April 15, 1988; April 13, 1989; September 19, 1989; April 17, 1991; and March 20, 1992, fuel bundles or blade guides were either improperly removed or found to be in an incorrect location, which were significant conditions adverse to quality. However, the corrective actions for these events, primarily training and counseling, did not preclude repetition, in that on October 6, 1993, fuel bundle 31-56 was removed incorrectly from the core.
2. Between March 1984, and October 1992, on at least thirteen occasions, the refueling mast was bent or damaged by impact or operation (a significant condition adverse to quality), due to operator performance. Corrective actions taken by the licensee, primarily training and counseling, were insufficient to prevent recurrence on October 26, 1993, when the mast again was damaged on impact with the reactor vessel flange due to operator performance. (01023)

These violations are classified in the aggregate as a Severity Level III problem (Supplement D).

Pursuant to the provisions of 10 CFR 2.201, Pennsylvania Power & Light Company (Licensee) is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region I, and a copy to the NRC Resident Inspector at the Susquehanna Steam Electric Station, Unit 1, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

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Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

Dated at King of Prussia, Pennsylvania
this 10th day of May 1994

DISTRIBUTION w/encl: Letter to Ms. Jane Lee, dated: September 22, 1994

Docket File 50-272/311 & 50-387/388 (w/incoming)

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