



Pennsylvania Power & Light Company

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SEP 28 1983

Bruce D. Kenyon  
Vice President-Nuclear Operations  
215/770-7502

Mr. Thomas T. Martin, Director  
Division of Engineering and Technical Programs  
U.S. Nuclear Regulatory Commission-Region I  
631 Park Avenue  
King of Prussia, PA 19406

SUSQUEHANNA STEAM ELECTRIC STATION  
NRC INSPECTION OF JULY 5-8, 1983  
NRC INSPECTION REPORT 50-387/83-18  
ER 100450 FILE 841-04  
PLA-1864

Docket No. 50-387

Dear Mr. Martin:

This letter provides PP&L's response to your letter of August 29, 1983, which forwarded NRC Region I Inspection Report No. 50-387/83-18 and "Appendix A, Notice of Violation."

Your notice advised that PP&L was to submit a written reply within (30) days of the date of the letter. We trust that the Commission will find the attached response acceptable.

Very truly yours,

B. D. Kenyon  
Vice President-Nuclear Operations

Attachment

cc: Mr. G. G. Rhoads - NRC Resident Inspector  
Mr. R. L. Nimitz - NRC Region I

## RESPONSE TO NOTICE OF VIOLATION

### A. Violation: (387/83-18-02)

Technical Specification 6.11, "Radiation Protection Program," requires that procedures for personnel radiation protection be prepared consistent with the requirements of 10 CFR Part 20 and be approved, maintained and adhered to for all operations involving personnel radiation exposure.

1. Procedure HP-TP-320, Revision 2, "Radiation Work Permits (RWP)," states in section 9.9 that personnel are to sign the RWP sign in sheet upon entry into RWP areas and that their signature indicates understanding of and agreement to comply with the RWP requirements. RWP No. 83-336, 'B' Evaporator and Condensate Pump, dated July 7, 1983 required personnel to wear protective clothing as specified therein.

Contrary to the above, on July 7, 1983 at about 6:30 p.m. two individuals entered the area controlled by the RWP and neither signed in on it's RWP upon entry nor donned all protective clothing specified therein (i.e. coveralls and head covering).

2. Procedure HP-HI-006, Revision 1, "Health Physics Technician Procedure Revision Update," requires in section 3.1.5 that the Health Physics Foreman/Assistant Foreman ensure (on a weekly bases as a minimum) that all personnel have reviewed and signed off the procedure review folder sheets contained in the procedure review folder.

Contrary to the above, as of July 7, 1983 the Health Physics Foreman/Assistant Foreman did not ensure all personnel had reviewed and signed off the procedure review sign off sheets in that two individuals, responsible for implementing procedure HP-TP-272, Revision 2, dated December 8, 1982, had not signed off the revision and two other individuals, responsible for implementing procedure HP-TP-624, Revision 2, dated April 28, 1983 had not signed off the revision to indicate that they have reviewed the procedure revisions.

### Response to A.1:

1. Corrective steps which have been taken and the results achieved:

The Assistant Plant Superintendent reviewed this event with PP&L construction, maintenance and instrumentation and controls personnel. He stressed the importance of complying with plant procedures and with the RWP procedures specifically.

2. Corrective steps which will be taken to avoid further violations:

The Training Department will emphasize the importance of compliance with all requirements of the Radiation Work Permit. This has been incorporated into a course on radiation worker training entitled Health Physics II which is required for unescorted access to controlled areas. Training has also incorporated a discussion of this incident into Health Physics II Retraining.

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3. The date when full compliance will be achieved:

As a result of the corrective action stated above, PP&L is now in full compliance.

Response to A.2:

1. Corrective steps which have been taken and the results achieved:

- (a) The individuals who had not reviewed the HP-TP-277 and HP-TP-624 revisions were identified and the required reviews were conducted and documented.
- (b) Procedure HP-HI-006 has been reviewed and revised to assure that there are no ambiguities and that it accomplishes its intent.
- (c) The importance of review of procedure changes has been reviewed with the Health Physics Foreman. In addition, a new activity has been added to the work activities list which requires positive action and a signoff upon completion. This activity requires the HP Foreman to review the weekly required reading lists and signoff sheets and to notify personnel who have not completed their required reading.

2. Corrective steps which will be taken to prevent further violations:

In addition to the corrective actions stated above, the Health Physics Supervisor will review this violation with all technicians and supervisory personnel in the Health Physics Section by October 15, 1983. The importance of compliance with all procedures will be stressed including specifically those regarding changes to procedures.

3. The date when full compliance will be achieved:

As a result of the corrective actions stated above, PP&L is now in full compliance.

B. Violation: (387/83-18-03)

10 CFR 19.11 requires that current copies of the regulations in Parts 19 and 20 be posted along with reactor license conditions, license amendments, operating procedures, and documents incorporated into the licenses or a notice be posted which describes the document and states where it may be examined. 10 CFR 19.11 also requires NRC Form-3, "Notice to Employees," be posted. This section also requires that these documents be posted in a sufficient number of places to allow workers to observe them on the way to or from licensed activity locations.

Contrary to the above, on July 7, 1983 and for an undetermined amount of time before this date the documents referenced above were not posted in a sufficient number of places to allow workers to observe them on the way to or from licensed activity locations. None of the documents referred to in

RESPONSE TO NOTICE OF VIOLATION

10 CFR 19.11 were posted at the Reactor Building Personnel Access Corridor (elevation 670'). The access corridor is an access to licensed activity locations.

Response:

1. Corrective steps which have been taken and results achieved:

All three entrances to the controlled zone are now properly posted.

2. Corrective steps which will be taken to avoid further violations:

The Unit 2 entrance to the controlled zone will be posted when the entrance is activated.

3. The date when full compliance will be achieved:

As a result of the corrective actions stated above, PP&L is now in full compliance.