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Pennsylvania Power & Light Company

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Mr. Thomas T. Martin, Director
Division of Engineering and Technical Programs
U.S. Nuclear Regulatory Commission-Region I
631 Park Avenue
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SUSQUEHANNA STEAM ELECTRIC STATION
NRC INSPECTION REPORT 50-388/83-19
OBSERVATIONS
ER 100508 FILE 841-04
PLA-2147

Docket No. 50-388

Dear Mr. Martin:

This letter provides PP&L's response to your letter of February 28, 1984, which forwarded NRC Region I Inspection Report No. 50-388/83-19 and "Appendix B, Observations."

Your letter advised that PP&L was to submit a written reply to the weaknesses within (30) days of the receipt 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. R. H. Jacobs - NRC Resident Inspector
Mr. L. H. Bettenhausen - NRC Resident Inspector

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OBSERVATIONS - WEAKNESSES

- A. Control of the configuration of the plant was less than adequate in that not all maintenance and calibration activities involving equipment removal were well tracked.

Response: (83-19-02)

As stated by the NRC Inspector in his report, discussions were held on the noted deficiencies and the resultant conclusion was that the systems turnover inspections made by the Integrated Startup Group would have identified these items. As also stated by the inspector, the Scram Discharge Volume Level Switch Assembly had not been turned over to the station staff at the time of the inspection and the RHR Small Bore piping had just recently been transferred from the construction phase to the startup phase.

The plant has passed through the construction completion milestone and the Operational Quality Assurance program which was implemented the week of the inspection is in full force. PP&L believes this weakness has been overcome and relies on the strength of its established procedures and Operational QA Program to prevent this type of weakness from resurfacing during the operational period.

- B. Plant cleanliness has not reached the level desirable for operational readiness.

Response: (83-19-04)

Subsequent to the inspection, station personnel implemented a comprehensive post-construction clean-up effort to prepare the plant for operations. The plant cleanliness currently meets or exceeds those levels desired for operational readiness, and is being maintained in such a condition. "Significant improvements" in Unit 2 housekeeping and cleanliness were observed during subsequent NRC inspections.

- C. Licensee staff involvement in developing and implementing the program for Preservice Inspection of welds and reviewing the data obtained from this program was minimal.

Response: (83-19-06)

PP&L as the Licensee is responsible for the overall adequacy and completion of the PSI program and these responsibilities were carried out in the following manner on Unit #2:

- 1) The appropriate code requirements for PSI were dictated by PP&L.
- 2) All drawings, program documents, etc. used by the contractor (NES) required a complete review and approval by PP&L prior to use. All documents were reviewed for code compliance and technical adequacy to existing plant design documents.
- 3) During the course of examinations, PP&L involvement was maintained through customer notification forms and PP&L approved field changes.

- 4) NES was contracted for PSI expertise and to represent the PP&L on items/questions within their scope of work. Since NES prepared the program documents and therefore had maximum involvement with the program, NES was consulted frequently during the audit to provide input on problem areas. This was a prudent course of action to ensure as complete and concise a problem resolution as possible.

Concerning the review of data, it must be pointed out that the independent verification by licensee personnel is not a programmatic requirement. The nuclear quality assurance construction group committed to and performed a quality assurance overview to assure the contractor's compliance to their program.

Concurrent with the overview, the PP&L nuclear quality assurance commissioned and witnessed two overchecks during 1983 to determine the validity of data generated by its contractor. While these overchecks were not performed by licensee personnel, they were, however, monitored by licensee personnel and a third party consultant. Where the overchecks identified problems, the contractor initiated corrective action which was verified by the licensee. The overchecks did confirm the validity of this data. In addition, the nuclear quality assurance group completed a comprehensive review of the data generated during PSI.

Based on the above, PP&L strongly believes that its involvement in the PSI program has been fully adequate to ensure that the program was carried out and completed properly.