



Pennsylvania Power & Light Company

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Vice President-Nuclear Operations  
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MAR 20 1984

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 REPORT 50-387/83-30  
AND 50-388/83-25  
EE 100450 FILE 841-04  
PLA-2088

Docket Nos. 50-387  
50-388

Dear Mr. Martin:

This letter provides PP&L's response to your letter of January 26, 1984, which forwarded NRC Region I Combined Inspection Reports 50-387/83-30 and 50-388/83-25 with Appendix C, Licensee Weakness.

Your Notice advised that PP&L was to submit a written response addressing the measures that will be taken to correct each of the weaknesses and the date by which they will be corrected. We trust that the Commission will find the attached response acceptable.

Very truly yours,

B. D. Kenyon  
Vice President-Nuclear Operations

Attachments

cc: Mr. R. H. Jacobs - NRC Resident Inspector

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## LICENSEE WEAKNESSES

### I. Overall Weaknesses

The licensee's program has the following apparent weaknesses:

\*1. Indications of weaknesses in the program for classification of systems, structures and components are:

- i. The definition and control of "Q-List" items are inadequate.

Response: (83-30-09; 83-25-09)

The Q-List is part of the Quality Consideration List (QCL). The QCL is an upper tier document which provides general definition of the systems, structures and components which are within the scope of the PP&L QA Program. To permit effective utilization of the document, further definition is provided in controlled design documents contained in the Configuration Control Data Base (CCDB). Items within the CCDB are considered lower tier documents to the QCL and should be utilized when performing Q Classifications of structures, systems and components as well as classification of work activities.

Direction for proper utilization of these documents in performing Q Classification of work activities has been addressed by changes to the Plant Administration Procedures AD-QA-502 (Work Authorizations) and the Maintenance Instruction MI-PS-003 (Classification of Work Authorizations). The Q-List has been revised and distributed.

- ii. The quality requirements for the "S-List" are inadequately defined.

Response: (83-30-10; 83-25-10)

PP&L has performed an evaluation of the Safety Impact Item Program. The program for the operating phase of SSES is dependant on extensive pre-engineering design reviews and pre-installation field walkdowns to insure that potential SII's are dispositioned in the design phase.

Based upon the evaluation, the S-List and associated procedures and guidelines will be revised, by April 28, 1984, to provide appropriate programmatic control for the operational Safety Impact Item program.

\*2. The licensee has not conducted a comprehensive and independent operational readiness assessment for Unit 2.

Response: (83-25-22)

PP&L's Nuclear Safety Assessment Group concluded, in a comprehensive independent assessment of PP&L's readiness to load fuel in Unit 2, that PP&L is well qualified to load fuel in Unit 2 and to safely

operate both units. As a result of the above actions, PP&L has satisfied the concern related to Unit 2 operational readiness.

## II. Training

The following deficiencies are indicative of a weakness in the licensee's Training Program:

- \*1. Shift technical advisors are not trained in handling a two unit scram situation.

Response: (83-30-12; 83-25-12)

Plant Administrative Procedure AD-QA-303 (Shift Routine) has been revised to incorporate the shared system responsibilities of Unit 1 personnel and the duties of the Shift Technical Advisor relating to a two unit scram situation. Training sessions have been conducted to instruct Operation's personnel and the STA's on their specific responsibilities.

- \*2. Unit 1 personnel are not instructed about their specific responsibilities for the shared systems.

Response: (83-30-01; 83-25-01)

See response to item II.1.

- 3. The training requirements on the individual's training matrix do not agree with the individual's training summary sheet.

Response: (83-30-02; 83-25-02)

By May 1, 1984 all individual records will agree with approved matrices.

- 4. The licensee has no time goals set for completion of "company assigned" and "suggested" training programs.

Response: (83-30-04; 83-25-04)

By March 31, 1984 PP&L shall initiate a review of nuclear training courses (company assigned and suggested). The review will address the process by which these designations are given to courses, their intent as part of the training package for job positions, and completion time. The review will be completed by June 1, 1984.

- 5. There are inadequate on-the-job training programs and inadequate training matrices for electrical maintenance and technical staff. Also there are poorly defined training categories.

Response: (83-30-05; 83-25-05)

Meetings were held during November/December 1983 and January/February 1984 to define the problems in Electrical Maintenance and Tech Staff Training.

An action plan has been developed to address the problems in Electrical Maintenance.

By April 1, 1984 an action plan will be developed to address the Tech Staff training problems.

6. There is a lack of periodic assessment on the effectiveness of training.

Response: (83-30-06; 83-25-06)

Curriculum Committees for each cost area meet at least once a year with PP&L's training group. Part of the committees responsibilities relate to the assessment of training effectiveness. Committee meeting minutes are documented and retained by the training group.

7. The training goals and training schedules have not been established for the newly appointed NQA-site Assistant Manager.

Response: (83-30-16; 83-25-16)

By April 16, 1984, training goals and schedules will be developed and the NQA-Site Assistant Manager will be trained.

8. The Site Supervisors do not participate in or control the training of Site QA-QC personnel.

Response: (83-30-18; 83-25-18)

By April 16, 1984, measures to control the training activities for the site QA/QC staff will be established.

### III. Maintenance

The licensee's Maintenance Program has the following weaknesses:

1. The maintenance Planner's Guide (MI-PS-001) incorrectly states that the Emergency Service Water System Motor Operated Valves are not covered by the Inservice Testing Program.

Response: (83-30-08; 83-25-08)

The Maintenance Planner's Guide (MT-PS-001) has been changed to correctly state that the ESW system MOV's are covered by the Inservice Testing Program. The Preventive Maintenance Program now includes the MOV's for the ESW system.

2. The Preventive Maintenance Program does not address motor operated valves for the emergency service water system.

Response: (83-30-07; 83-25-07)

See response to item III.1.

#### IV. Operations

- \*1. Written procedures and/or instructions to delineate shared system responsibility to Unit 1 personnel do not exist.

Response: (83-30-01; 83-25-01)

See response to item II.1.

2. The distribution of "Operations Modification Information Summary Sheets" (OMISS) by the Operations group is not prompt.

Response: (83-30-14; 83-25-14)

The OMISS (Operations Modification Information Summary Sheet) which is written for each modification, is an aid to the Operations and Training departments. The OMISS is a brief description of the modification.

A procedure change has been issued to require Plant Engineering to process an OMISS prior to completion of the installation of a modification as applicable. Formalized training on modifications that result in operational changes to the plant, is given by the Nuclear Training Group.

#### V. Quality Assurance

1. The job description and administrative procedures are not revised to reflect the recent site Nuclear Quality Assurance (NQA) reorganization.

Response: (83-30-15; 83-25-15)

By April 16, 1984, the required procedures and job descriptions will be revised or developed.

2. The NQA-Site organization has not developed a management control program.

Response: (83-30-17; 83-25-17)

By April 16, 1984, the measures to control allocation and use of resources and to manage contingencies will be developed and implemented.

3. Several Nonconformance Reports (NCRs) from 1980 to 1981 were open.

Response: (83-30-20; 83-25-20)

Four NCR's identified in the inspection report are closed. The other four have been dispositioned.

\* Indicates items NRC expects to be completed prior to the issuance of the Operating License for Unit 2.