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Bruce D. Kenyon
Vice President-Nuclear Operations
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AUG 17 1984

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

SUSQUEHANNA STEAM ELECTRIC STATION
NRC INSPECTION REPORTS 50-387/84-18
AND 50-388/84-22
ER 100450 FILE 841-04 Docket Nos. 50-387
PLA-2280 50-388

Dear Mr. Starostecki:

This letter provides PP&L's response to your letter of July 19, 1984, which forwarded NRC Region I Combined Inspection Reports 50-387/84-18 and 50-388/84-22 with Appendix A, Notice of Violation.

Your Notice advised that PP&L was to submit a written reply within thirty (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

Attachments

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

IE01

RESPONSE TO NOTICE OF VIOLATION

A.1 Violation (388/84-22-01)

Technical Specification 6.8.1 and Regulatory Guide 1.33, Revision 2, February 1978 require that written procedures be established, implemented and maintained covering surveillance of safety-related equipment such as the Reactor Core Isolation Cooling (RCIC) System. Surveillance Procedure SO-250-003, Revision 0, "18 Month RCIC System and Logic Functional Check", dated December 1, 1983, requires that the system be aligned for automatic start with the RCIC pump controller in automatic and set for 600 GPM when restoring the system after testing.

Contrary to the above on May 17, 1984, from about 5:40 a.m. until about 9:15 a.m., the RCIC system was not aligned for automatic start, in that the RCIC pump controller remained in manual after restoring the system following surveillance testing. The system was declared operable at 6:44 a.m.; however, several control panel walkdowns, conducted during shift turnover, failed to identify this mispositioned controller which was found by the NRC at 9:15 a.m.

Response:

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

(a) Surveillance procedures SO-150-003 and SO-250-003 have been changed to include a verification signature which ensures the RCIC pump controller is returned to automatic and set for 625 GPM following testing.

(b) Shift supervision has reviewed the incident with the operators involved.

(2) Corrective steps being taken to avoid further violations:

As part of an on-going program to enhance operator performance, surveillance procedures will be reviewed to ensure verification signatures are included when required.

(3) Date of Full Compliance:

(a) Based on the actions taken in (1) above, PP&L is in full compliance.

A.2 Violation (387/84-18-01)

Technical Specification 3.6.5.1 requires that secondary containment integrity be maintained while in Operational Condition 1. In accordance with Technical Specification 1.37 and 4.6.5.1.b.3, included in the requirement for secondary containment integrity is that all secondary containment penetrations required to be closed during accident conditions, including penetrations between zones, are either closed or capable of being closed by an automatic isolation system.

Contrary to the above, during the period April 20-22, 1984, while Unit 1 was in Operational Condition 1, secondary containment penetrations (Unit 2 drywell ventilation hatches and personnel airlock doors) between Zones II and III, required to be closed during accident conditions, were not closed or capable of being closed by an automatic isolation system.

Response:

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

The personnel hatches were closed, thus removing the path for cross connection of the ventilation zones.

(2) Corrective steps being taken to avoid further violations:

(a) The maintenance procedures for reactor head insulation installation and drywell head removal/installation have been changed. These procedures now require Shift Supervision to "sign-off" in the procedure prior to maintenance pulling the drywell head or removing head spray piping and instrument lines or opening drywell head area hatches.

(b) The administrative procedure for control of primary containment access and integrity has been revised to include a caution about not having the equipment hatch nor the personnel hatch open when the drywell head is removed or the drywell head area hatches are open.

(c) A Maintenance Instruction has been written and will be issued by September 1, 1984, that describes the boundaries of secondary containment and the verification zones. The Instruction goes into a checklist of items that should be considered in order to prevent cross connection of ventilation zones and compromising secondary containment.

(d) The Maintenance Planner's Guide has been changed to specifically address the need for planners to review work activities for possible conflicts with maintaining secondary containment integrity.

(e) This event has been placed on the Supervisor of Operations Weekly Meeting agenda to be reviewed with all shifts.

(3) Date of Full Compliance:

Based on the actions taken in (1) above, PP&L is in full compliance.