PP&L Pennsylvania Power & Light Company
Two North Ninth Street • Allentown, PA 18101 • 215 / 770-5151

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

SEP 21 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 50-387/84-22
AND 50-388/84-28
ER 100450 FILE 841-04 Docket Nos. 50-387
PLA-2309 50-388

Dear Mr. Starostecki:

This letter provides PP&L's response to your letter of July 31, 1984, which forwarded NRC Region I Combined Inspection Reports 50-387/84-22 and 50-388/84-28 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. However, as discussed with Mr. Gene Kelly of NRC Region I on August 24, 1984, PP&L has been authorized to delay its response to the Notice of Violation until September 21, 1984. 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

IE: 01
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RESPONSE TO NOTICE OF VIOLATION

A. Violation (387/84-22-02)

Technical Specifications 3.3.7.10 and 3.3.7.11 require obtaining grab samples every 8 hours when the RHR Service Water Effluent Line gross radioactivity monitor and the noble gas activity monitor of the Turbine Building Stack Particulate Iodine and Noble Gas (SPING) monitor are inoperable. Technical Specification 4.0.2 specifies that surveillance requirements be performed within the specified interval plus 25%, or 10 hours for these samples.

Contrary to the above, on May 23, 1984, no grab sample was taken of RHR Service Water Loop 'A' effluent line between 5:35 a.m. and 6:40 p.m., a period of approximately 13 hours, and no sample for noble gas was taken of the Turbine Building ventilation exhaust between 11:45 p.m. May 22 and 11:40 a.m. May 23, a period 12 hours, while the associated radioactivity monitors were inoperable.

Response:

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

a) Samples were drawn after the ten hour time limit expired. Analysis of these samples indicated no detectable activity in the RHR Service Water Effluent line nor the Turbine building ventilation exhaust.

b) A review was made of analysis data from samples taken prior to and subsequent to the missed sampling of the RHR Service Water Effluent Line. It was concluded that no release was made. This was based on the premise that if the RHR Heat Exchanger had leaked during the thirteen hour period between samples, traces of radioactivity would have been detected in samples taken later.

c) A review was made of analysis data for the Turbine building ventilation exhaust. Within the period of May 22 to May 25, eleven noble gas grab samples were collected and analyzed. Seven of the samples indicated activity below the LLD (Lower Limit of Detection). Four of the samples were slightly higher than the LLD but essentially constant. Based on the constant, low release rates together with the fact that no plant evolutions occurred to change the release rate, it was concluded that no adverse consequences resulted from the late sampling.

(2) Corrective steps which have been or will be taken to avoid further violations:

a) The Chemistry Supervisor personally met with all responsible chemistry technicians to ensure each one understands their responsibilities as delineated in the Administrative Procedure governing conduct of the Chemistry section.

b) A tickler file for "in effect" LCO sampling has been initiated to ensure LCO sampling remains a high priority item.

c) The Chemistry LCO Sample Log has been changed to include a "Date/Time Next Sample Due" column.

d) A review of "LCO required sampling intervals" is being undertaken. Those found to be overly conservative will be evaluated to determine if Technical Specification changes are appropriate.

(3) Date of Full Compliance:

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

B. Violation (387/84-22-04)

Technical Specification Surveillance Requirement 4.3.7.9.1 states that each of the required fire detection instruments, as listed in Table 3.3.7.9-1, which are accessible during unit operation shall be demonstrated operable at least once per six months by performance of a channel functional test.

Contrary to the above, between September 23, 1983 and July 5, 1984, a period of greater than nine months, each of the required instruments in at least twelve fire zones listed in Technical Specification Table 3.3.7.9-1 were not demonstrated operable by performance of a channel functional test.

Response:

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

a) Upon identification of the overdue surveillance tests, a channel functional test was performed on the nineteen affected zones with satisfactory results.

b) A review of all fire detection zones affected by the same surveillance procedure was made. This review confirmed that all other zones were tested. No other discrepancies were identified.

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

a) A review was conducted of the surveillance tests for all types of fire detectors in all fire detection zones specified in the Technical Specifications for both units. The results of this review demonstrate present compliance to the Technical Specifications.

b) Personnel responsible for updating the surveillance tracking program, have been reminded of the importance to properly credit as "complete" only components that were surveilled.

(3) Date of Full Compliance:

Based upon the actions above, PP&L is in full compliance.