



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

DEC 18 1984

Docket No. 50-388  
EA 84-109

Pennsylvania Power & Light Company  
ATTN: Mr. Jack Calhoun  
Senior Vice President, Nuclear  
2 North Ninth Street  
Allentown, Pennsylvania 18101

Gentlemen:

Subject: Notice of Violation (NRC Inspection Report 50-388/84-34)

On July 26, 1984 an event occurred at the Susquehanna Steam Electric Station, Unit 2, involving a complete loss of all low pressure Emergency Core Cooling Systems (ECCS). The condition existed for approximately 43 minutes before plant operators successfully restored this capability. On July 26, 1984 a Confirmatory Action Letter was sent to you, and on July 27, 1984 a Confirmatory Order was issued, in each case documenting your commitments to the NRC to (1) bring the reactor to a cold shutdown condition, (2) perform a thorough investigation of the causes and implications of the event, (3) identify and correct the specific deficiencies, and (4) remain shut down until receiving NRC approval for restart. An NRC inspection was conducted at the Susquehanna Steam Electric Station during the period July 26 through 31, 1984 to review the circumstances associated with the event. The inspection report was forwarded to you on September 18, 1984. On October 9, 1984 an Enforcement Conference was held with you and members of your staff to discuss the violations.

The event occurred when an operator, in preparation for a required startup test, opened the wrong knife switches in each of four Engineered Safeguards Systems (ESS) bus breaker cubicles during the performance of the pre-test circuit breaker alignments. Although the operator erred in opening the wrong knife switches, the nomenclature of the labels on the switches he did open were synonymous with the functional description of the circuits he was attempting to deenergize. In addition, the qualified shift test engineer who performed the independent verification of the appropriateness of the position of the knife switches did not identify that the incorrect knife switches had been opened. Similar improper manipulations of these knife switches had occurred on June 4 and October 6, 1983; however, corrective actions taken to prevent a recurrence were not adequate in that the individual involved in the July 26, 1984 event had not received the training provided on the lessons learned from the previous two occurrences. Such training was specified by the licensee as the required corrective action.

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The event also demonstrated that the training provided to non-licensed operators was insufficient regarding the rack out of 4.16KV breakers, reset of emergency diesel generator alarms and trips, personnel awareness of the meaning of 4.16KV ESS breaker indicating lights, and restoration of suppression pool temperature monitoring equipment. In addition, the written procedure used to perform the test was insufficient regarding the rack out of 4.16KV breakers, and the unusual situation to be encountered in finding two knife switches in the breaker cubicles rather than the one switch found in most breaker cubicles.

This was a serious event which demonstrates the importance of adequate controls to ensure safe performance of licensed activities and to ensure that significant problems which have been identified are thoroughly corrected to prevent recurrence. Accordingly, I have decided to issue the enclosed Notice of Violation and Proposed Imposition of Civil Penalty in the amount of Fifty Thousand Dollars (\$50,000) for the violations described in the enclosed Notice. The violations have been categorized in the aggregate as a Severity Level III problem in accordance with the General Statement of Policy and Procedure for NRC Enforcement Actions, 10 CFR Part 2, Appendix C, as revised, 49 FR 8583 (March 8, 1984). The base civil penalty for this type of violation is \$50,000. We acknowledge that your preparation for this test was extensive and well documented, the response to the event by the operations staff was excellent, and your subsequent analysis of the event and its causes, as well as your corrective actions, were prompt and comprehensive. However, there were two precursors to this event and your corrective actions in response to these two precursors were not adequate to prevent their recurrence. Thus, despite your excellent actions in response to the event, and consistent with our application of the Enforcement Policy, mitigation of the civil penalty based on prompt and extensive corrective actions is not being proposed.

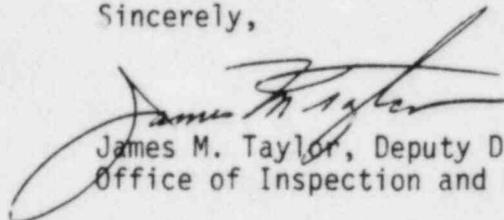
You are required to respond to the enclosed Notice of Violation and Proposed Imposition of Civil Penalty. In preparing your response, you should follow the instructions specified in the enclosed Notice. In your response, you should describe the actions taken or planned to avoid similar violations in the future. Your written reply to this letter and the results of future inspections will be considered in determining whether further enforcement action is appropriate. During the inspection a deviation was also identified and is described in the enclosed Notice of Deviation.

In accordance with 10 CFR 2.790(a) of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosure will be placed in the NRC Public Document Room.

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The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget, as required by the Paperwork Reduction Act of 1980, PL 96-511.

Sincerely,



James M. Taylor, Deputy Director  
Office of Inspection and Enforcement

Enclosures:

1. Notice of Violation and  
Proposed Imposition of Civil Penalty
2. Notice of Deviation

cc w/encls:

Norman W. Curtis, Vice President, Engineering and Construction - Nuclear  
A. R. Sabol, Manager, Nuclear Quality Assurance  
W. E. Barberich, Licensing Engineer  
H. W. Keiser, Superintendent of Plant  
Public Document Room (PDR)  
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