



Pennsylvania Power & Light Company

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

FEB 4 1985

Mr. Richard W. Starostecki, Director  
Division of Projects and Resident Programs  
U.S. Nuclear Regulatory Commission  
Region 1  
631 Park Avenue  
King of Prussia, PA 19406

SUSQUEHANNA STEAM ELECTRIC STATION  
RESPONSE TO ENFORCEMENT ACTION 84-134  
(NRC INSPECTION REPORT 50-387/84-35)  
ER 100450 FILE 841-04  
PLA-2400

Docket No. 50-387

Dear Mr. Starostecki:

This letter provides PP&L's response to your letter of January 4, 1985, which forwarded NRC Region 1 Enforcement Action 84-134 (Inspection Report 50-387/84-35).

Your Notice of Violation 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  
Ms. M. J. Campagnone - NRC (NRR)

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RESPONSE TO NOTICE OF VIOLATION

VIOLATION (387/84-35)

Technical Specification limiting condition for operation (LCO) 3.1.3.4. requires that with the reactor in operational conditions 1 or 2, the average scram insertion time, from the fully withdrawn position, for the three fastest control rods in each group of four control rods arranged in a two-by-two array, based on deenergization of the scram pilot valve solenoids as time zero, shall not exceed any of the following:

<u>Position Inserted From Fully Withdrawn</u>	<u>Average Scram Insertion Time (Seconds)</u>
45	0.45
39	0.92
25	2.05
05	3.70

With the average scram insertion times of control rods exceeding the above limits, technical specification LCO action statement 3.1.3.4.(a)(1)-(2) requires that either

1. The control rods with the slower than average scram insertion times be declared inoperable until an analysis is performed to determine that required scram reactivity remains for the slow four control rod group; and
2. The Surveillance Requirements of Specification 4.1.3.2.c. be performed at least once per 60 days when operation is continued with an average scram insertion time(s) in excess of the average scram insertion time limit; or

the reactor shall be in at least HOT SHUTDOWN within the next 12 hours.

Contrary to the above, on June 25, 1984, when Surveillance Procedure SR-155-003 was performed using scram insertion time data from a June 13, 1984 scram to demonstrate control rod operability in accordance with Technical Specification 3.1.3.4., the average scram insertion time to notch position 45 for the three fastest rods in the four rod 2 x 2 array containing control rods 38-39, 38-43, 42-39 and 42-43, was 0.462 seconds; the control rods in the 2 x 2 array with the slower than average times were not declared inoperable; and the reactor was allowed to operate in Operational Condition 1 for various time intervals between June 25, 1984 and October 6, 1984.

The cause of the violation was failure to detect the slow scram insertion time due to inadequate review of the completed surveillance.

Response:

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

- a. Each Control Rod Scram Pilot valve was examined and modified to improve reliability by replacement of the polyurethane disc holder assembly with one made of Viton, which is a more resilient material.
- b. Each control rod on both units was scram tested and found to be within the required scram time specifications during the plant startups following the above modifications.
- c. The scram analysis computer program was modified to specify all Technical Specification violations on page one of the computer printout.
- d. Reactor Engineering personnel attended training on this incident to review the causes and corrective actions.
- e. Reactor Engineering personnel attended training to review each Engineer's responsibilities during the performance of surveillances.
- f. Reactor Engineering surveillances were reviewed and revised as necessary to include an "As Found" column for each acceptance criteria.

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

An on-going independent review of the surveillance program implementation is being performed. This review includes:

- 1) Review of surveillance implementation schedules, actual implementation dates, and Technical Specification Requirements, to assure timely completion of surveillances.
- 2) Review of new or revised surveillance procedures versus the Technical Specification Matrix and technical specification requirements to assure that requirements are met and that the matrix is updated.
- 3) Review of selected, completed surveillances independent of the normal review and approval process, for completeness and data obtained versus acceptance criteria.

(3) Date of Full Compliance:

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

VENDOR/SUPPLIER INFORMATION

Your letter requested a response relative to actions taken to ensure that suppliers of materials to Susquehanna SES inform PP&L of product improvements so that PP&L can evaluate the priority for implementing the improvements.

Response:

Vendor/Supplier product improvements initiated for reasons unrelated to safety need not be identified to the user. These improvements are undertaken in the normal course of business. Requiring vendors/suppliers to notify all users of all product improvements would be an onerous burden which could halt the implementation of many improvements which ultimately benefit the users. In addition, there would be enormous resources needed to review this input which would be duplicated at every facility. This is feasible only where the vendor has identified the change as one which should be evaluated for implementation. It is our belief that vendors currently carry this out in a satisfactory manner.