



Pennsylvania Power & Light Company

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

DEC 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 50-388/84-42  
NOTICE OF VIOLATION  
ER 100508 FILE-841-04  
PLA-2375

Docket No. 50-388

Dear Mr. Martin:

This letter and its attachment provide PP&L's response to your letter of November 20, 1984, which forwarded the subject inspection reports & Appendix A, "Notice of Violation". Attachment 1 contains the response to Appendix A.

Your notice advised that FP&L was to submit a written reply within (30) days of the date of the letter. We trust that the Commission will find the attached responses acceptable.

Very truly yours,

B. D. Kenyon  
Vice President-Nuclear Operations

Attachment

cc: Mr. R. H. Jacobs - NRC Resident Inspector  
Mr. D. J. Florek - NRC Region 1

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PDR ADOCK 05000388  
G PDR

Attachment 1

RESPONSE TO NOTICE OF VIOLATION

VIOLATION (388/84-42-01)

Technical Specification 6.8.1.C states in part "Procedures shall be established, implemented and maintained covering the surveillance and test activities of safety related equipment. PP&L administrative procedure AD-QA-422, Attachment C, states, in part "Surveillance procedures shall refer to the technical specification being satisfied and when acceptance criteria are not met, the applicable limiting conditions for operation shall be listed."

Contrary to the above, as of October 5, 1984, several examples were identified regarding inadequate surveillance procedures relating to End-of-Cycle Recirculation Pump Trip Instrumentation. SI-283-313 did not indicate that it satisfied technical specification 3.3.4.2 nor did it refer to the limiting condition for operation. The requirements of technical specification table 3.3.4.2-3 and 4.3.4.2.3 were only partially satisfied by SI-283-413. SI-283-514 referenced limiting conditions for operation which do not exist.

RESPONSE

1. The Corrective Steps which have been taken and the results achieved:

Prior to closeout of the inspection (October 5, 1984), the following corrective actions were taken:

- a) A procedure change (1-84-1258) was initiated and approved to SI-183-313 to add the appropriate technical specification tables and action statements.
- b) A procedure change (2-84-1225) was initiated and approved to SI-283-313 to add the appropriate technical specification tables and action statements.
- c) A procedure change (1-84-1259) was initiated and approved to SI-183-514 to correct the action statements.
- d) A procedure change (2-84-1226) was initiated and approved to SI-283-514 to correct the action statements.

In addition, Unit 2 procedure SI-283-413 has been revised to demonstrate the sum of the response times of the active devices, including the breaker arc suppression time.

2. The corrective steps which will be taken to avoid further violations:

Prior to the next performance of the 18 Month surveillance to verify proper response time, Unit 1 procedure SI-183-413 will be revised to demonstrate the sum of the response times of the active devices, including the breaker arc suppression time. It is anticipated that this revision will be completed by 2/01/85.

3. The date when full compliance will be achieved:

In accordance with aforementioned corrective actions, PP&L is in full compliance.