

November 17, 1999

Mr. Robert G. Byram
Senior Vice President - Nuclear
Pennsylvania Power & Light Company
2 North Ninth Street
Allentown, Pennsylvania 18101

SUBJECT: NRC TEAM INSPECTION REPORT NO. 50-387/99-10 and 50-388/99-10

Dear Mr. Byram:

This refers to the NRC Engineering Team Inspection conducted at your Susquehanna Steam Electric Station (SSES) Unit 1& 2 reactor facilities from September 13, 1999 to October 1, 1999. The overall objective of the inspection was to determine the effectiveness of the engineering organization in supporting safe plant operations. This inspection included evaluation of the 10 CFR 50.59 safety evaluation program for preparing safety evaluations related to changes, tests or experiments at the plant. The enclosed report presents the results of this inspection. The preliminary findings were discussed with Mr. R. Saunders, Vice President Nuclear Operations, and others of your staff on October 1, 1999 and in a subsequent follow-up telephone conversation with Mr. D. Filchner and other members of your engineering staff on October 12, 1999.

Overall, the team concluded that when fully engaged your engineering staff provided adequate support for resolution of technical problems and was generally effective in supporting safe plant operations. This inspection also determined that the 50.59 safety evaluation program was implemented satisfactorily.

The team observed some communication and coordination problems within the PPL organization and non-adherence with established procedures and processes that delayed resolution of some technical issues by engineering. Some notable examples are: engineering was not effective in initially resolving all issues related to adverse Emergency Service Water pump-to-pump interactions; engineering was not effective in the timely resolution of eighteen Secondary Containment isolation damper stroke time surveillance test failures that occurred over the past 2.5 years; operability determinations did not consistently provide adequate justification to support conclusions; configuration control problems were identified where installed plant bypasses had not been properly evaluated, identified, or documented as required by procedure; and, engineering evaluation screening determinations were not performed for waived 'required' preventive maintenance activities as required by procedure. We understand your recent integrated self-assessment found similar problems.

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Based on the results of this inspection, the NRC has determined that three Severity Level IV violations of NRC requirements occurred. Your corrective actions for all three violations were reviewed during this inspection and found acceptable. Therefore, these violations are being treated as Non-Cited Violations (NCVs), consistent with Appendix C of the Enforcement Policy. The first NCV involved two examples of failing to follow procedures relating to bypasses and deferral of preventive maintenance items. The second NCV pertained to PPL failing to restore the operability of the 'C' and 'D' Emergency Service Water (ESW) pumps within seven days or taking the appropriate technical specification action. The third NCV was due to untimely corrective actions in resolving eighteen Secondary Containment isolation damper stroke time surveillance test failures over the last 2.5 years. All three violations are considered closed. No response is required. If you contest the violations or severity level of these NCVs, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555-0001, with copies to the Regional Administrator, Region I, the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001, and the NRC Resident Inspector at the Susquehanna Steam Electric Station.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

Sincerely,

Wayne D. Lanning, Director
Division of Reactor Safety

Docket Nos: 50-387;50-388

cc w/encl:

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B. Shriver, General Manger Susquehanna Steam Electric Station
G. T. Jones, Vice President - Engineering and Support
T. Harpster, Supervisor, Nuclear Licensing
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MR. Robert G. Byram

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