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U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, DC 20555

**SUSQUEHANNA STEAM ELECTRIC STATION (SSES)
REQUEST FOR AMENDMENT TO EXTEND THE
IMPLEMENTATION DATE FOR AMENDMENT NO. 184
TO LICENSE NPF-14 AND AMENDMENT NO. 158 TO
LICENSE NPF-22: FINAL RESPONSE TO GL 94-02:
LONG-TERM STABILITY SOLUTION**
PLA-5164

**Docket Nos. 50-387
and 50-388**

References: *1) Nerses to Byram letter dated July 30, 1999; Susquehanna Steam Electric Station Units 1 and 2 (TAC NOS. MA2271 and MA2445)*

The purpose of this letter is to request an amendment to extend the implementation date for the amendments issued in Reference 1. The amendments issued in Reference 1 are to be implemented 30 days following startup from the Unit 1 Eleventh Refueling Inspection Outage scheduled for Spring 2000. These amendments to the SSES Units 1 and 2 Technical Specifications, when implemented, will incorporate the Final Response to GL 94-02: Long Term Stability Solution into the SSES Units 1 and 2 Technical Specifications. The need for the implementation date revision was discussed with the NRC Senior Project Manager.

Hardware and software design deficiencies identified over the past 3 years have adversely affected our ability to install and operate the OPRM system. The SSES OPRM system has been installed and in trial monitoring mode intermittently since early 1997. During the past couple of years, plant personnel have identified hardware and software issues. As a result, the OPRM units have had to be shipped to the vendor facility for repair several times. Upon subsequent re-installation, other issues have been identified.

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The initial set of problems were addressed in OPRM Service Bulletin 98-01, dated October 30,1998. This bulletin required mandatory recall by the vendor to make design improvements for the OPRM. There were three defective conditions that were addressed by the vendor. They were: (1) Intermittent operation and unintentional resets of the OPRM module, (2) Failure of the reset switches located on the front of the OPRM module, (3) Mechanical stress on the internal circuit cards when the module electronics are installed in its enclosure. These improvements were implemented and the OPRM units reinstalled at SSES. Subsequently in June of 1999, the vendor issued a Part 21 report concerning an OPRM software defect. The vendor has developed software changes to correct the software defect. The changes are expected to be delivered to SSES within the next few months leaving insufficient time to install and validate their effectiveness.

The amendments issued in Reference 1 incorporate into the SSES Unit 1 and 2 Technical Specifications a new Section 3.3.1.3 entitled "Oscillation Power Range Monitoring (OPRM) Instrumentation", and revise Section 3.4.1 "Recirculation Loops Operating" to remove the specifications related to current stability specifications.

Presently, SSES is operating under the Interim Corrective Actions (ICAs) defined in Unit 1 and 2 Technical Specification Section 3.4.1. These actions are the interim actions accepted by the NRC for core protection until a permanent protection system is installed.

PPL requests that the amendment implementation date for Amendment No. 184 to License NPF-14 and Amendment No. 158 to License NPF-22 be revised to become effective no later than 11/01/2001. This revised date will provide sufficient time to allow for the necessary adjustments by the vendor, pre-installation testing and calibration by PPL, work management considerations, and a reasonable period of operation in order to monitor the system's final readiness.

Once PPL is satisfied that all issues with the OPRM system have been resolved, PPL will review Reference 1 and all the pertinent supporting documentation that formed the basis for the Safety Evaluation contained in Reference 1. Prior to implementation of the subject amendments, PPL will confirm that these documents and thus the basis for amendment approval is unaffected by these issues. If the review identifies the need for changes to Reference 1 or the pertinent documentation, PPL will not implement the subject amendments until NRC approval of the identified changes is received.

This communication contains the following commitments:

No.	Commitment
PLA-5164-1	Implement the Amendments 184 and 158 by 11/01/2001
PLA-5164-2	Review, prior to amendment implementation, the supporting documentation for the NRC Safety Evaluation to confirm these do not require change.

If you have any questions, please contact Mr. M. H. Crowthers at (610) 774-7766.

Sincerely,

R. G. Byram

Attachment: Affidavits

copy: NRC Region I
Mr. S. L. Hansell, NRC Acting Resident Inspector
Mr. R. G. Schaaf, NRC Sr. Project Manager
Mr. D. J. Allard, Pennsylvania DEP/BRP

BEFORE THE
UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of :

PP&L, INC. : Docket No. 50-387

REQUEST TO EXTEND THE IMPLEMENTATION DATE FOR AMENDMENT NO. 184 TO FACILITY OPERATING LICENSE NO. NPF-14 SUSQUEHANNA STEAM ELECTRIC STATION UNIT NO. 1

Licensee, PP&L, Inc., hereby files a revision to proposed Amendment No. 184 to its Facility Operating License No. NPF-14 dated July 17, 1982.

This amendment contains a revision to the Susquehanna SES Unit 1 Technical Specifications.

PPL, INC.
BY:

R. G. Byram
Sr. Vice-President and Chief Nuclear Officer

Sworn to and subscribed before me
this 14 day of March, 2000.

Notarial Seal
Susan Grabowski-Turi, Notary Public
Allentown, Lehigh County
My Commission Expires Sept. 8, 2003

Notary Public

BEFORE THE
UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of :

PP&L, INC. : Docket No. 50-388

REQUEST TO EXTEND THE IMPLEMENTATION DATE FOR AMENDMENT NO. 158 TO FACILITY OPERATING LICENSE NO. NPF-22 SUSQUEHANNA STEAM ELECTRIC STATION UNIT NO. 2

Licensee, PP&L, Inc., hereby files a revision to proposed Amendment No. 158 to its Facility Operating License No. NPF-22 dated March 23, 1984.

This amendment contains a revision to the Susquehanna SES Unit 2 Technical Specifications.

PPL, INC.
BY:

R. G. Byram
Sr. Vice-President and Chief Nuclear Officer

Sworn to and subscribed before me
this 14 day of March, 2000.

Notarial Seal
Susan Grabowski-Turi, Notary Public
Allentown, Lehigh County
My Commission Expires Sept. 8, 2003

Notary Public