

April 11, 2000

Mr. Robert G. Byram
Senior Vice President-Generation
and Chief Nuclear Officer
PP&L, Inc.
2 North Ninth Street
Allentown, PA 18101

SUBJECT: NOTICE OF ENFORCEMENT DISCRETION FOR PP&L, INC. REGARDING
SUSQUEHANNA STEAM ELECTRIC STATION, UNIT 2 (TAC NO. MA8621,
NOED NO. 00-6-005)

Dear Mr. Byram:

By letter dated April 8, 2000, PP&L, Inc. (PP&L) requested that the NRC exercise discretion not to enforce compliance with the actions required in Technical Specification (TS) Surveillance Requirement (SR) 3.6.1.1.1. PP&L's letter documented information previously discussed with the NRC in a telephone conference on April 8, 2000, at approximately 1:00 p.m. The principal NRC staff members who participated in that telephone conference included: E. Adensam, Director, Project Directorate 1 (PD1), Office of Nuclear Reactor Regulation (NRR); A.R. Blough, Director, Division of Reactor Projects, Region I; W. Lanning, Director, Division of Reactor Safety, Region I; J. Hannon, Chief, Plant Systems Branch, NRR; C. Cowgill, Chief, Branch 4, Division of Reactor Projects, Region I; A. Blamey, Resident Inspector, Division of Reactor Projects, Region I; G. Cranston, Engineering Programs, Division of Reactor Safety, Region I; D. Collins, Project Manager, PD1, NRR; and J. Pulsipher, Plant Systems Branch, NRR. PP&L stated that on April 8, 2000, at 2:30 p.m. the plant would not be in compliance with TS SR 3.0.3, which allows 24 hours to complete the subject surveillance. At that time, Action A.1 of limiting condition for operation 3.6.1.1, Primary Containment, would apply, which requires restoration of primary containment to operable status within 1 hour. If that completion time is not met, Action B.1 requires the unit to be in Mode 3 within 12 hours and in Mode 4 within 36 hours. The Action Statement for SR 3.0.3 was entered on April 7, 2000, at 2:30 p.m. PP&L requested that a Notice of Enforcement Discretion (NOED) be issued pursuant to the NRC's policy regarding exercise of discretion for an operating facility, set out in Section VII.c. of the "General Statement of Policy and Procedures for NRC Enforcement Actions" (Enforcement Policy), NUREG-1600, and be effective for the period until the Unit 2 - 10th refueling outage in the spring of 2001 or the next entry into Mode 4 if that precedes the refueling outage. This letter documents our telephone conversation on April 8, 2000, at approximately 2:30 p.m. when we verbally issued this NOED.

In both the conference call with the NRC staff and PP&L's April 8, 2000, letter, PP&L explained that as a result of some questions raised during work on the Unit 1 spectacle flange 1S299B, PP&L identified a condition on Unit 2 spectacle flanges 2S299A and 2S299B which may have prevented an adequate Local Leakage Rate Test (LLRT) during the previous outage. Specifically, PP&L believes that the spectacle flanges may have been installed with three o-rings in each flange face where the design is intended to only use two. The effect of the third o-ring is that it may obstruct the test ports which are used to pressurize the volume between the o-rings during performance of the LLRT such that the pressure retaining ability of the inner

and outer o-rings is not tested. Thus, PP&L believes that the LLRT performed in accordance with SR 3.6.1.1.1 on the spectacle flanges 2S299A and 2S299B, in penetrations X246A and X246B, RHR relief valve discharge lines, during the 1997 Unit 2 Refueling and Inspection outage may not be valid.

PP&L stated that the safety rationale for the NRC granting the NOED is that: (1) PP&L does not believe it is possible to conduct testing while the unit is at power to verify that the last LLRT performed on these penetrations was valid. Such testing could potentially breach containment integrity by placing the penetrations in a configuration where only one o-ring would be relied upon; (2) the existence of the third o-ring in each face of the spectacle flange does not affect the pressure retaining ability of the pipe flange to spectacle flange interface. Testing performed on Unit 1 on April 8, 2000, showed that the third o-ring did not completely block the test ports, and that LLRTs performed on Unit 1 in both two and three o-ring configurations resulted in comparable and acceptable leakage values. Based on the conclusion that the pressure retaining ability of the pipe flange to spectacle flange interface is not degraded by the presence of the third o-ring, the licensee concluded that no compensatory measures are warranted; (3) review of the historical LLRT performance data for these penetrations shows that they typically have leakages less than 20 standard cubic centimeters per minute (SCCM), where their administrative limit is 500 SCCM; and, (4) in addition to the substantial margin between the actual seal leakage and the administrative limits exhibited by this historical data, there is substantial margin in the actual containment total leakage. PP&L stated that the current total for type B and C containment minimum pathway leakage is less than $.05L_a$ where the TS limit is $0.6L_a$. During the telephone conference, in reply to an NRC staff query, PP&L staff stated that the current total maximum pathway leakage for type B and C tests is $0.134L_a$. Since the o-ring seals are passive devices, PP&L stated that it is unlikely that the performance of these seals would be degraded enough to result in total containment leakage in excess of the TS limits.

In addition to the above considerations, PP&L noted in its letter that any containment atmosphere leakage through these seals would be filtered by the Standby Gas Treatment System prior to being released to the environment. In addition, the termination of the piping inside containment is beneath the surface of the suppression pool. Thus, PP&L stated that the potential safety consequences to the health and safety of the general public as result of the inability to test these penetrations is inconsequential.

The NRC staff has considered PP&L's request. Based on the results of the testing performed on Unit 1; the passive nature of the o-ring seals; and the available margin between the current maximum pathway leakage total for type B and C tests and the TS limit, the NRC staff finds the justifications for granting the requested NOED to be acceptable. The staff considers it unlikely that the presence of the third o-ring will substantially compromise the integrity of the spectacle flange-to-pipe flange interface. Given the low safety significance of the identified deficiency, the NRC staff considers that enforcement of compliance with SR 3.6.1.1.1 would result in an undesirable plant transient without a compensating increase to the health and safety of the general public. Thus, the NRC staff believes that PP&L has satisfied criterion 1(a) of Section B.2 of the guidance contained in the NRC Inspection Manual, Part 9900, Technical Guidance, Operations—Notices of Enforcement Discretion, June 29, 1999.

On the basis of the staff's evaluation of your request, we have concluded that a NOED is warranted because we are clearly satisfied that this action involves minimal or no safety impact, is consistent with the enforcement policy and staff guidance, and has no adverse impact on public health and safety. Therefore, it is our intention to exercise discretion not to enforce compliance with SR 3.6.1.1.1. for the period from April 8, 2000, at 2:30 p.m. until issuance of a license amendment which provides allowance for a one-time exclusion of the LLRT on these penetrations from the testing program. That amendment request was submitted on April 10, 2000. The staff plans to complete its review and issue the license amendment within 4 weeks of the date of this letter.

As stated in the Enforcement Policy, action will be taken, to the extent that violations were involved, for the root cause that led to the noncompliance for which this NOED was necessary.

Sincerely,

/RA/

Elinor Adensam, Director
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reaction Regulation

Docket No. 50-388

cc: See next page

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Elinor Adensam, Director
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