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JUL 31 2000

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Mail Station OP1-17  
Washington, DC 20555

**SUSQUEHANNA STEAM ELECTRIC STATION  
PROPOSED AMENDMENT NO. 231 TO  
LICENSE NPF-14 AND PROPOSED  
AMENDMENT NO. 196 TO LICENSE NPF-22:  
MSIV MAXIMUM PATHWAY LEAKAGE  
PLA-5219**

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

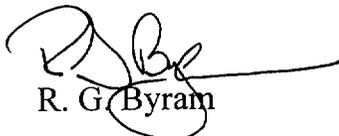
The purpose of this letter is to propose changes to the Susquehanna Steam Electric Station Unit 1 and Unit 2 Technical Specifications. This change removes the words 'maximum pathway' from Surveillance Requirement SR 3.6.1.3.12.

Enclosure A to this letter is the "Safety Assessment" supporting this change. Enclosure B is the No Significant Hazards Considerations evaluations performed in accordance with the criteria of 10 CFR 50.92 and the Environmental Assessment. Enclosure C to this letter contains the applicable pages of the Susquehanna SES Unit 1 and Unit 2 Technical Specifications marked to show the proposed changes. Enclosure D contains the "camera ready" version of the revised Technical Specification pages. The proposed change has been approved by the Susquehanna SES Plant Operations Review Committee and reviewed by the Susquehanna Review Committee.

We request NRC complete its review of this change by January 31, 2001 in order to support leak rate testing of the MSIVs during the Unit 2 10<sup>th</sup> Refueling and Inspection Outage.

Should you have any questions regarding this submittal, please contact Mr. C. T. Coddington at (610) 774-4019.

Sincerely,

  
R. G. Byram

copy: NRC Region I  
Mr. S. Hansell, NRC Sr. Resident Inspector  
Mr. R. G. Schaaf, NRC Project Manager  
Mr. W. P. Dornsife, PA DEP

A001

**BEFORE THE  
UNITED STATES NUCLEAR REGULATORY COMMISSION**

In the Matter of :

PPL Susquehanna, LLC :

Docket No. 50-387

**PROPOSED AMENDMENT NO. 231 TO LICENSE NPF-14:  
MSIV MAXIMUM PATHWAY LEAKAGE  
SUSQUEHANNA STEAM ELECTRIC STATION  
UNIT NO. 1**

Licensee, PPL Susquehanna, LLC, hereby files a revision 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 Susquehanna, LLC

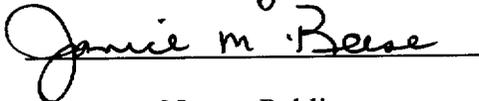
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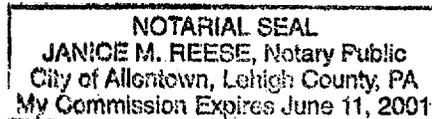
R. G. Byram

Sr. Vice-President and Chief Nuclear Officer

Sworn to and subscribed before me  
this 31<sup>st</sup> day of July, 2000.



Notary Public



**BEFORE THE  
UNITED STATES NUCLEAR REGULATORY COMMISSION**

In the Matter of :

PPL Susquehanna, LLC :

Docket No. 50-388

**PROPOSED AMENDMENT NO. 196 TO LICENSE NPF-22:  
MSIV MAXIMUM PATHWAY LEAKAGE  
SUSQUEHANNA STEAM ELECTRIC STATION  
UNIT NO. 2**

Licensee, PPL Susquehanna, LLC, hereby files a revision 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 Susquehanna, LLC

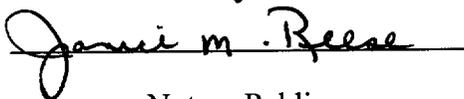
BY:



R. G. Byram

Sr. Vice-President and Chief Nuclear Officer

Sworn to and subscribed before me  
this 31<sup>st</sup> day of July, 2000.



Notary Public

NOTARIAL SEAL  
JANICE M. REESE, Notary Public  
City of Allentown, Lehigh County, PA  
My Commission Expires June 11, 2001

**ENCLOSURE A TO PLA-5219**

**SAFETY ASSESSMENT**

## **SAFETY ASSESSMENT**

### **MSIV MAXIMUM PATHWAY LEAKAGE**

#### **BACKGROUND**

When the Main Steamline Isolation Valve (MSIV) leakage acceptance criteria was changed from 46 standard cubic feet per hour (scfh) to 300 scfh, the term “maximum pathway” was added to the Technical Specifications. This change was issued by the Commission in Amendment No. 151 to Facility Operating License No. NPF-14 and Amendment No. 121 to Facility Operating License No. NPF-22 via a letter dated August 15, 1995. Based on a review of PPL’s Technical Specification change request and the Commission’s safety evaluation, PPL could not establish why “maximum pathway” was used. The use of maximum pathway is inconsistent with 10CFR50 Appendix J and the Standard Technical Specifications. If the term “maximum pathway” is deleted, the evaluation for operability and reportability will be consistent with 10CFR50 Appendix J which bases these evaluations on the as-found minimum pathway leak rate.

#### **Description of the Proposed Changes**

In Limiting Condition for Operation (LCO) 3.6.1.3, Surveillance Requirement SR 3.6.1.3.12 and applicable Technical Specification Bases section, the words “maximum pathway” are being deleted.

#### **SAFETY ANALYSIS**

The safety function of interest is primary containment integrity. The standard for addressing 10CFR50 Appendix J leakage is minimum pathway as-found and maximum pathway as-left. The Design Basis Accident (Loss of Coolant Accident) dose analysis assumes that 300 scfh of leakage through the MSIVs reaches the main condenser. When as-found MSIV leak rate testing is performed, the leak rate for each MSIV is determined. The total leakage that reaches the main condenser is the summation of the leakage that passes through both of the MSIVs in each of the four main steamlines. This leakage is

the minimum pathway leak rate. The minimum pathway leak rate is compared to the design basis to assess operability and reportability. Applying the maximum pathway leak rate (assumes best valve fails) is overly conservative and is not consistent with NEI 94-01 or Standard Technical Specifications.

By eliminating the term “maximum pathway”, there is no change in margin of safety. The MSIVs will continue to be leak rate tested in accordance with 10CFR50 Appendix J. The as-left leakage will continue to be below 300 scfh maximum pathway. The as-found leakage will be compared to 300 scfh minimum pathway for operability and reportability, which is consistent with 10CFR50 Appendix J. The change does not affect the as-found MSIV testing evaluation of results and decisions regarding reworking of the MSIVs during as-found testing. The change only affects operability and reportability determinations.

## **CONCLUSIONS**

The change does not impact operator performance or procedures. Leak rate testing of the MSIVs will continue to be performed in accordance with 10CFR50 Appendix J. There is no change in testing only a change in how as-found leakage is evaluated for operability and reportability. The change does not impact the FSAR, commitments or other licensing documents. The FSAR requires MSIV leak rate testing to 300 scfh total combined leakage. Therefore, NRC approval of the proposed change does not involve any reduction in the margin of safety.

**ENCLOSURE B TO PLA-5219**

**NO SIGNIFICANT HAZARDS CONSIDERATIONS  
AND ENVIRONMENTAL ASSESSMENT**

**NO SIGNIFICANT HAZARDS CONSIDERATIONS  
AND ENVIRONMENTAL ASSESSMENT**

**MSIV MAXIMUM PATHWAY LEAKAGE**

PPL has evaluated the proposed Technical Specification change in accordance with the criteria specified by 10 CFR 50.92 and has determined that the proposed changes do not involve a significant hazards consideration. The criteria and conclusions of our evaluation are presented below.

- 1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.**

The proposed change to eliminate the words “maximum pathway” does not affect any plant system or component. The change does not impact operator performance or procedures. The leak rate testing of the MSIVs will continue to be performed in accordance with 10CFR50 Appendix J. The change does not impact the design basis accident analyses presented in the FSAR. The change only affects how the as-found leakage is used to evaluate operability and reportability. This change is consistent with the guidance on leak rate testing presented in NEI 94-01 and the Standard Technical Specifications. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

- 2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.**

As discussed above, the proposed change to the Technical Specifications does not affect any plant system or component and does not affect plant operation. The consequences of accidents will remain within the accident analysis described in the FSAR. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

**3. The proposed change does not involve a significant reduction in a margin of safety.**

The proposed change does not affect any plant system or component, and does not have any impact on plant operation. The proposed change does not involve a significant reduction in the margin of safety as currently defined in the bases of the applicable Technical Specification section. Therefore, the proposed change does not involve a significant reduction in the margin of safety.

**ENVIRONMENTAL CONSEQUENCES**

An environmental assessment is not required for the proposed change because the requested change conforms to the criteria for actions eligible for categorical exclusion as specified in 10 CFR 51.22(c)(9). The requested change will have no impact on the environment. The proposed change does not involve a significant hazards consideration as discussed above. The proposed change does not involve a significant change in the types or significant increase in the amounts of any effluent that may be released offsite. In addition, the proposed change does not involve a significant increase in the individual or cumulative occupational radiation exposure.

**ENCLOSURE C TO PLA-5219**

**TECHNICAL SPECIFICATION MARK-UPS**

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
SR 3.6.1.3.10 Remove and test the explosive squib from each shear isolation valve of the TIP System.	24 months on a STAGGERED TEST BASIS
SR 3.6.1.3.11 -----NOTES----- Only required to be met in MODES 1, 2, and 3. ----- Verify the combined leakage rate for all secondary containment bypass leakage paths is $\leq 9$ scfh when pressurized to $\geq P_a$ .	In accordance with the Primary Containment Leakage Rate Testing Program.
SR 3.6.1.3.12 -----NOTES----- Only required to be met in MODES 1, 2, and 3. ----- Verify leakage rate through each MSIV is $\leq 100$ scfh and $\leq 300$ scfh for the combined <del>maximum pathway</del> leakage including the leakage from the MS Line Drains, when the MSIVs are tested at $\geq 22.5$ psig or $P_a$ and the MS Line Drains are tested at $P_a$ .	In accordance with the Primary Containment Leakage Rate Testing Program.

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.6.1.3.11 -----NOTES----- Only required to be met in MODES 1, 2, and 3. -----</p> <p>Verify the combined leakage rate for all secondary containment bypass leakage paths is <math>\leq 9</math> scfh when pressurized to <math>\geq P_a</math>.</p>	<p>In accordance with the Primary Containment Leakage Rate Testing Program.</p>
<p>SR 3.6.1.3.12 -----NOTES----- Only required to be met in MODES 1, 2, and 3. -----</p> <p>Verify leakage rate through each MSIV is <math>\leq 100</math> scfh and <math>\leq 300</math> scfh for the combined <del>maximum pathway</del> leakage including the leakage from the MS Line Drains when the MSIVs are tested at <math>\geq 22.5</math> psig or <math>P_a</math> and the MS Line Drains are tested at <math>P_a</math>.</p>	<p>In accordance with the Primary Containment Leakage Rate Testing Program.</p>

(continued)

**ENCLOSURE D TO PLA-5219**

**“CAMERA-READY” TECHNICAL  
SPECIFICATION PAGES**

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
SR 3.6.1.3.10 Remove and test the explosive squib from each shear isolation valve of the TIP System.	24 months on a STAGGERED TEST BASIS
SR 3.6.1.3.11 -----NOTES----- Only required to be met in MODES 1, 2, and 3. ----- Verify the combined leakage rate for all secondary containment bypass leakage paths is $\leq 9$ scfh when pressurized to $\geq P_a$ .	In accordance with the Primary Containment Leakage Rate Testing Program.
SR 3.6.1.3.12 -----NOTES----- Only required to be met in MODES 1, 2, and 3. ----- Verify leakage rate through each MSIV is $\leq 100$ scfh and $\leq 300$ scfh for the combined leakage including the leakage from the MS Line Drains, when the MSIVs are tested at $\geq 22.5$ psig or $P_a$ and the MS Line Drain are tested at $P_a$ .	In accordance with the Primary Containment Leakage Rate Testing Program.

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.6.1.3.11 -----NOTES-----            Only required to be met in MODES 1, 2, and 3.            -----            Verify the combined leakage rate for all secondary containment bypass leakage paths is <math>\leq 9</math> scfh when pressurized to <math>\geq P_a</math>.</p>	<p>In accordance with the Primary Containment Leakage Rate Testing Program.</p>
<p>SR 3.6.1.3.12 -----NOTES-----            Only required to be met in MODES 1, 2, and 3.            -----            Verify leakage rate through each MSIV is <math>\leq 100</math> scfh and <math>\leq 300</math> scfh for the combined leakage including the leakage from the MS Line Drains when the MSIVs are tested at <math>\geq 22.5</math> psig or <math>P_a</math> and the MS Line Drains are tested at <math>P_a</math>.</p>	<p>In accordance with the Primary Containment Leakage Rate Testing Program.</p>

(continued)