Robert G. Byram
Senior Vice President and
Chief Nuclear Officer

PPL Susquehanna, LLC
Two North Ninth Street
Allentown, PA 18101-1179
Tel. 610.774.7502 Fax 610.774.5019
rgbyram@pplweb.com

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

SUSQUEHANNA STEAM ELECTRIC STATION
PROPOSED AMENDMENT NO. 202 TO
LICENSE NPF-22:
RHR RELIEF VALVE LINE LEAK TESTING
PLA-5258 **Docket No. 50-388**

The purpose of this letter is to propose a change to the Susquehanna Steam Electric Station Unit 2 Technical Specification SR 3.6.1.1.1.

Enclosure A to this letter is the "Safety Assessment" supporting this change. Enclosure B is the No Significant Hazards Considerations evaluation 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 2 Technical Specifications marked to show the proposed change. Enclosure D contains the "camera ready" version of the revised Technical Specification page. The proposed change has been approved by the Susquehanna SES Plant Operations Review Committee and reviewed by the Susquehanna Review Committee.

This change is administrative in nature and PPL plans to incorporate it into the Technical Specifications upon NRC approval.

Should you have any questions regarding this submittal, please contact Mr. D. L. Filchner at (610) 774-7819.

Sincerely,

R. G. Byram

copy: NRC Region I
Mr. S. Hansell, NRC Sr. Resident Inspector
Mr. R. G. Schaaf, NRC Project Manager
Mr. D. J. Allard, PA DEP

A017

BEFORE THE
UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of :

PPL Susquehanna, LLC : Docket No. 50-388

PROPOSED AMENDMENT NO. 202 TO LICENSE NPF-22:
RHR RELIEF VALVE LINE LEAK TESTING
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 16th day of November, 2000.

Notary Public

Notarial Seal
Nancy J. Lannen, Notary Public
Allentown, Lehigh County
My Commission Expires June 14, 2004

ENCLOSURE A TO PLA-5258

SAFETY ASSESSMENT

SAFETY ASSESSMENT

RHR RELIEF VALVE LINE LEAK TESTING

BACKGROUND

On April 8, 2000 PPL requested that the NRC exercise discretion not to enforce compliance with the actions required in the Unit 2 Technical specification (TS) Surveillance Requirement (SR) 3.6.1.1.1. The NRC granted this discretion to be effective 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. Subsequently, PPL proposed and the NRC approved a one-time exigent change to the SSES Unit 2 Technical Specifications which consisted of a note added to SR 3.6.1.1.1 stating that SR 3.6.1.1.1 is not required to be performed on 2S299A and 2S299B spectacle flange o-rings until the Unit 2 10th refueling Outage (Spring 2001) or a prior Unit 2 outage requiring entry into Mode 4.

Description of the Proposed Changes

This change to Technical Specifications removes the note referenced above from Unit 2 Technical Specification SR 3.6.1.1.1.

SAFETY ANALYSIS

The proposed change is removal of the subject note from Unit 2 Technical Specification SR 3.6.1.1.1. This change produces no impact on nuclear safety. The condition which created the need for the note as an exigent Technical Specification change was corrected during the Unit 2 Forced Outage in August 2000 and therefore the note is no longer required. The surveillance requirement 3.6.1.1.1 required leak rate test was subsequently implemented. The test acceptance criteria were met.

CONCLUSIONS

NRC approval of the proposed change and deviation does not involve any reduction in the margin of safety.

ENCLOSURE B TO PLA-5258

NO SIGNIFICANT HAZARDS CONSIDERATIONS AND ENVIRONMENTAL ASSESSMENT

NO SIGNIFICANT HAZARDS CONSIDERATIONS AND ENVIRONMENTAL ASSESSMENT

RHR RELIEF VALVE LINE LEAK TESTING

PPL Susquehanna, LLC proposes to remove the Note from Unit 2 Technical Specification SR 3.6.1.1.1 which was added as a one time exigent change to reflect enforcement discretion granted by the NRC on April 8, 2000 at 1430 hours. The change allowed Unit 2 operation to continue until the Unit 2 10th refueling outage (Spring 2001) or a prior Unit 2 outage requiring entry into Mode 4. The Note is no longer required because the o-ring configuration within the RHR system spectacle flanges was corrected while the unit was in Mode 4 during a forced shutdown in August, 2000. The surveillance requirement 3.6.1.1.1 required leak rate test was subsequently implemented. The test acceptance criteria were met.

PPL has evaluated the proposed Technical Specification change and has determined that it does 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.**

   This change to Technical Specification SR 3.6.1.1.1 is administrative in nature. The note is no longer required as the condition has been corrected and the SR performed with acceptable results. Removal of the note restores the Technical Specification to its original condition and therefore, this proposed amendment does not involve any increase in the probability of occurrence 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.**

   The note is no longer required as the condition has been corrected and the SR performed with acceptable results. Removal of the note by this change restores the Technical Specification to its original condition and therefore does not create any possibility of a new or different kind of accident from those previously analyzed.

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

The note is no longer required as the condition has been corrected and the SR performed with acceptable results. Therefore, removal of the note by this change restores the Technical Specification to its original condition and does not involve a reduction in any margin of safety.

ENVIRONMENTAL CONSEQUENCES

An environmental assessment is not required for this change to Technical Specification SR 3.6.1.1.1. Removal of the note which was added as a one time exigent change is no longer required. This change conforms to the criteria for actions eligible for categorical exclusion as specified in 10 CFR 51.22(c)(9). Removal of this note will have no impact on the environment. As discussed in the "No Significant Hazards Consideration Evaluation", the proposed change does not involve a significant hazard consideration. The proposed change does not involve a change in the types or increase in the amounts of effluents that may be released off-site. In addition, the proposed change does not involve an increase in the individual or cumulative occupational radiation exposure.

ENCLOSURE C TO PLA-5258

TECHNICAL SPECIFICATION MARK-UPs

SURVEILLANCE REQUIREMENTS

remove

SURVEILANCE		FREQUENCY
~~NOTE~~ ~~Not required to be performed on the 2S299A and 2S299B spectacle flange o-rings until the Unit 2 10th Refueling Outage (Spring 2001) or a prior Unit 2 outage requiring entry into Mode 4.~~		
SR 3.6.1.1.1	Perform required visual examinations and leakage rate testing except for primary containment air lock testing, in accordance with the Primary Containment Leakage Rate Testing Program.	In accordance with the Primary Containment Leakage Rate Testing Program.
SR 3.6.1.1.2	Verify that the drywell-to-suppression chamber bypass leakage is less than 0.00535 ft^2 at an initial differential pressure of $\geq$ 4.3 psi.	When performing 10 CFR 50 Appendix J, Type A testing, in accordance with the Primary Containment Leakage Rate Testing Program. AND ----------Note---------- Only required after two consecutive tests fail and continues until two consecutive tests pass ---------- 24 months

ENCLOSURE D TO PLA-5258

"CAMERA-READY" TECHNICAL SPECIFICATION PAGES

SURVEILLANCE REQUIREMENTS

SURVEILANCE		FREQUENCY
SR 3.6.1.1.1	Perform required visual examinations and leakage rate testing except for primary containment air lock testing, in accordance with the Primary Containment Leakage Rate Testing Program.	In accordance with the Primary Containment Leakage Rate Testing Program.
SR 3.6.1.1.2	Verify that the drywell-to-suppression chamber bypass leakage is less than 0.00535 ft^2 at an initial differential pressure of $\geq$ 4.3 psi.	When performing 10 CFR 50 Appendix J, Type A testing, in accordance with the Primary Containment Leakage Rate Testing Program. AND ----------Note---------- Only required after two consecutive tests fail and continues until two consecutive tests pass ---------- 24 months