UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

July 12, 1991

Docket Nos. 50-387
and 50-388

Mr. Harold W. Keiser
Senior Vice President-Nuclear
Pennsylvania Power and Light Company
2 North Ninth Street
Allentown, Pennsylvania 18101

Dear Mr. Keiser:

SUBJECT: TEMPORARY WAIVER OF COMPLIANCE RELATING TO RWCU ISOLATION, SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2 (TAC NOS. 80105 AND 80106)

By letter dated July 8, 1991, Pennsylvania Power and Light Company (PP&L) requested relief or a temporary waiver of compliance from the requirements of Technical Specification Table 3.3.2-2 Item 4.b. This requirement provides a Trip Setpoint of 118.3 degrees F and an Allowable Value of 125.3 degrees F to isolate the Reactor Water Cleanup System (RWCU) on a high RWCU Penetration Room Temperature. The requested relief would increase the Technical Specification Trip Setpoint from 118.3 to 131 degrees F and the Allowable Value from 125.3 to 137 degrees F. This request for relief is based on the supporting technical information in PP&L's January 9, 1991, request for a license amendment to permanently change the affected Technical Specifications.

This RWCU isolation logic is part of the Steam Leak Detection System whose purpose is to provide timely detection and isolation of small high energy line leaks prior to catastrophic failure of the piping system while maintaining sufficient margin above normal operating and post-accident room temperatures. Susquehanna Steam Electric Station, Unit 2 has recently experienced two inadvertent isolations of the RWCU system on High RWCU Penetration Room Temperature. Both instances were attributed to the ambient room temperature being too close to the isolation setpoint. This situation occurs during the summer season and is caused by protracted periods of high outdoor air temperature. Automatic isolations of the RWCU system can result in unnecessary plant shutdowns and equipment problems.

The NRC Staff's review of your January 9, 1991 submittal, requesting a Technical Specification change to resolve this issue, is pending a response to our Request for Additional Information (RAI) dated June 13, 1991. You have committed to respond to this RAI by August 9, 1991. Submitted information to date includes the following points: (1) that the requested relief would not affect the plant's ability to detect leakage as required by General Design Criterion (GDC) 30 and the provisions of Regulatory Guide 1.45; (2) that the new setpoints would not affect the safety function of the RWCU (Steam Leak Detection) System: (3) that all other safety functions of the RWCU System remain unaffected by the change; (4) a proposal for the enactment of compensatory measures to be taken while this temporary waiver of compliance is

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in effect and; (5) that recent RWCU system isolations have been caused by seasonally high ambient temperatures in the RWCU Penetration Room. Based on the fact that the plant can meet the leak detection requirements of GDC 30 with the requested relief, the new setpoints would not affect the safety function of the RWCU (Steam Leak Detection) System, other means of leakage detection are available including room flood detectors, high system flow rates, high system differential flow rates and primary coolant level, and the proposed compensatory measures, we find that the requested relief from the Technical Specifications presents no significant effect on the safety of the plant and presents no undue risk to the health and safety of the public. Moreover, unnecessary isolations of the RWCU will cause undesirable transients in the plant's water chemistry. Therefore, we conclude that a temporary waiver of compliance from Technical Specification Table 3.3.2-2 Item 4.b regarding the aforementioned increases in the RWCU isolation setpoints should be granted.

Accordingly, we hereby grant the requested temporary waiver of compliance. This temporary waiver of compliance shall be effective immediately and is to remain in effect until October 15, 1991, or until the NRC completes its review of the pending PP&L response to the staff's June 13, 1991 RAI, whichever first occurs.

Sincerely,
/S/
Jose A. Calvo, Assistant Director
for Region I Reactors
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

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Jose' A. Calvo

Jose A. Calvo, Assistant Director
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