

July 11, 1995

Mr. Robert G. Byram  
Senior Vice President-Nuclear  
Pennsylvania Power and Light Company  
2 North Ninth Street  
Allentown, PA 18101

SUBJECT: SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2  
(TAC NOS. M92106 & M92107)

Dear Mr. Byram:

The Commission has issued the enclosed Amendment No. 148 to Facility Operating License No. NPF-14 and Amendment No. 118 to Facility Operating License No. NPF-22 for the Susquehanna Steam Electric Station, Units 1 and 2. These amendments are in response to your letter dated April 10, 1995.

These amendments remove from the Susquehanna Steam Electric Station, Units 1 and 2 Technical Specifications, the response time limit Tables 3.3.1-2, 3.3.2-3, and 3.3.3-3. The information in the tables is being added to the Final Safety Analysis Report in accordance with the guidance in Generic Letter 93-08, "Relocation of Technical Specification Tables of Instrument Response Time Limits," dated December 29, 1993.

A copy of our Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's Biweekly Federal Register Notice.

Sincerely,

/s/

Chester Poslusny, Senior Project Manager  
Project Directorate I-2  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Docket Nos. 50-387/50-388

- Enclosures: 1. Amendment No. 148 to License No. NPF-14
- 2. Amendment No. 118 to License No. NPF-22
- 3. Safety Evaluation

cc w/encls: See next page

DISTRIBUTION:

<del>Public</del>	MO'Brien	CGrimes
PUBLIC	CPoslusny	WRackley
PDI-2 Reading	OGC	ACRS(4)
SVarga	OPA	OC/LFDCB
JZwolinski	GHill(4)	JWhite, RGN-I
JStolz		

OFC	MS for 4/13/95	CP	:PDI-2/LA	:PDI-2/PM	:PDI-2	:OGC	:PDI-2/D	:
NAME	:MO'Brien	:CPoslusny	:WRackley	:R Bachman	:JStolz	:		
DATE	: 7/1/95	: 6/15/95	: 6/15/95	: 6/16/95	: 7/5/95	:		

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

July 11, 1995

Mr. Robert G. Byram  
Senior Vice President-Nuclear  
Pennsylvania Power and Light Company  
2 North Ninth Street  
Allentown, PA 18101

SUBJECT: SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2  
(TAC NOS. M92106 & M92107)

Dear Mr. Byram:

The Commission has issued the enclosed Amendment No. 148 to Facility Operating License No. NPF-14 and Amendment No. 118 to Facility Operating License No. NPF-22 for the Susquehanna Steam Electric Station, Units 1 and 2. These amendments are in response to your letter dated April 10, 1995.

These amendments remove from the Susquehanna Steam Electric Station, Units 1 and 2 Technical Specifications, the response time limit Tables 3.3.1-2, 3.3.2-3, and 3.3.3-3. The information in the tables is being added to the Final Safety Analysis Report in accordance with the guidance in Generic Letter 93-08, "Relocation of Technical Specification Tables of Instrument Response Time Limits," dated December 29, 1993.

A copy of our Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's Biweekly Federal Register Notice.

Sincerely,

Chester Poslusny, Senior Project Manager  
Project Directorate I-2  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Docket Nos. 50-387/50-388

Enclosures: 1. Amendment No. 148 to  
License No. NPF-14  
2. Amendment No. 118 to  
License No. NPF-22  
3. Safety Evaluation

cc w/encls: See next page

Mr. Robert G. Byram  
Pennsylvania Power & Light Company

Susquehanna Steam Electric Station,  
Units 1 & 2

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

PENNSYLVANIA POWER & LIGHT COMPANY

ALLEGHENY ELECTRIC COOPERATIVE, INC.

DOCKET NO. 50-387

SUSQUEHANNA STEAM ELECTRIC STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 148  
License No. NPF-14

1. The Nuclear Regulatory Commission (the Commission or the NRC) having found that:
  - A. The application for the amendment filed by the Pennsylvania Power & Light Company, dated April 10, 1995, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the regulations of the Commission;
  - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of the Facility Operating License No. NPF-14 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 148 and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. PP&L shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and is to be implemented within 30 days after its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



John F. Stolz, Director  
Project Directorate I-2  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical  
Specifications

Date of Issuance: July 11, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 148

FACILITY OPERATING LICENSE NO. NPF-14

DOCKET NO. 50-387

Replace the following pages of the Appendix A Technical Specifications with enclosed pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change.

REMOVE

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### **3/4.3 INSTRUMENTATION**

#### **3/4.3.1 REACTOR PROTECTION SYSTEM INSTRUMENTATION**

##### **LIMITING CONDITION FOR OPERATION**

---

3.3.1 As a minimum, the reactor protection system instrumentation channels shown in Table 3.3.1-1 shall be OPERABLE.

**APPLICABILITY:** As shown in Table 3.3.1-1.

**ACTION:**

- a. With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip System requirement for one trip system:
  1. If placing the inoperable channel(s) in the tripped condition would cause a scram, the inoperable channel(s) shall be restored to OPERABLE status within 6 hours or the ACTION required by Table 3.3.1-1 for the affected Functional Unit shall be taken; or
  2. If placing the inoperable channel(s) in the tripped condition would not cause a scram, place the inoperable channel(s) and/or that trip system in the tripped condition within 12 hours.
- b. With the number of OPERABLE channels less than required by the Minimum OPERABLE channels per Trip System requirement for both trip systems, place at least one trip system\* in the tripped condition within 1 hour and take the ACTION required by Table 3.3.1-1. The provisions of Specification 3.0.4 are not applicable for entry into Operational Condition 2 or 3 from Operational Condition 1 for the IRMs or the Neutron Flux - Upscale, Setdown function of the APRMs.

##### **SURVEILLANCE REQUIREMENTS**

---

- 4.3.1.1 Each reactor protection system instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION operations for the OPERATIONAL CONDITIONS and at the frequencies shown in Table 4.3.1.1-1.
- 4.3.1.2 LOGIC SYSTEM FUNCTIONAL TESTS and simulated automatic operation of all channels shall be performed at least once per 18 months.
- 4.3.1.3 The REACTOR PROTECTION SYSTEM RESPONSE TIME of each reactor trip functional unit shall be demonstrated to be within its limit at least once per 18 months.\*\* Each test shall include at least one channel per trip system such that all channels are tested at least once every N times 18 months where N is the total number of redundant channels in a specific reactor trip system.
- 4.3.1.4 The provisions of Specification 4.0.4 are not applicable for entry into Operational Condition 2 or 3 from Operational Condition 1 for the IRMs or the Neutron Flux - Upscale, Setdown function of the APRMs.

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\* If more channels are inoperable in one trip system than in the other, place the trip system with more inoperable channels in the tripped condition, except when this would cause a scram to occur.

\*\* The neutron detectors are exempt from response time testing.

**TABLE 3.3.1-2  
REACTOR PROTECTION SYSTEM RESPONSE TIMES**

**DELETED**

## **INSTRUMENTATION**

### **3/4.3.2 ISOLATION ACTUATION INSTRUMENTATION**

#### **LIMITING CONDITION FOR OPERATION**

---

3.3.2 The isolation actuation instrumentation channels shown in Table 3.3.2-1 shall be OPERABLE with their trip setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.3.2-2.

**APPLICABILITY:** As shown in Table 3.3.2-1.

**ACTION:**

- a. With an isolation actuation instrumentation channel trip setpoint less conservative than the value shown in the Allowable Values column of Table 3.3.2-2, declare the channel inoperable until the channel is restored to OPERABLE status with its trip setpoint adjusted consistent with the Trip Setpoint value.
- b. With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip System requirement for one trip system, place the inoperable channel(s) and/or that trip system in the tripped condition\* within 1 hour. The provisions of Specification 3.0.4 are not applicable.
- c. With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip System requirement for both trip systems, place at least one trip system\*\* in the tripped condition within 1 hour and take the ACTION required by Table 3.3.2-1.

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\* An inoperable channel need not be placed in the tripped condition where this would cause the Trip Function to occur. In these cases, the inoperable channel shall be restored to OPERABLE status within 2 hours or the ACTION required by Table 3.3.2-1 for that Trip Function shall be taken. In addition, for the HPCI system and RCIC system isolation, provided that the redundant isolation valve, inboard or outboard, as applicable, in each line is OPERABLE and all required actuation instrumentation for that valve is OPERABLE, one inoperable channel need not be placed in the tripped condition where this would cause the Trip Function to occur. In these cases, for the HPCI and RCIC systems, the inoperable channel shall be restored to OPERABLE status within 8 hours or the ACTION required by Table 3.3.2-1 for that trip Function shall be taken.

\*\* If more channels are inoperable in one trip system than in the other, place the trip system with more inoperable channels in the tripped condition, except when this would cause the Trip Function to occur.

## **INSTRUMENTATION**

### **SURVEILLANCE REQUIREMENTS**

---

- 4.3.2.1 Each isolation actuation instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION operations for the OPERATIONAL CONDITIONS and at the frequencies shown in Table 4.3.2.1-1.
- 4.3.2.2 LOGIC SYSTEM FUNCTIONAL TESTS and simulated automatic operation of all channels shall be performed at least once per 18 months.
- 4.3.2.3 The ISOLATION SYSTEM RESPONSE TIME of each isolation trip function shall be demonstrated to be within its limit at least once per 18 months.<sup>\*\*\*</sup> Each test shall include at least one channel per trip system such that all channels are tested at least once every N times 18 months, where N is the total number of redundant channels in a specific isolation trip system.

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<sup>\*\*\*</sup> Neutron detectors are exempt from response time testing.

**TABLE 3.3.2-3  
ISOLATION SYSTEM INSTRUMENTATION RESPONSE TIME**

**DELETED**

**TABLE 3.3.2-3 (Continued)**  
**ISOLATION SYSTEM INSTRUMENTATION RESPONSE TIME**

**DELETED**

## **INSTRUMENTATION**

### **3/4.3.3 EMERGENCY CORE COOLING SYSTEM ACTUATION INSTRUMENTATION**

#### **LIMITING CONDITION FOR OPERATION**

---

3.3.3 The emergency core cooling system (ECCS) actuation instrumentation channels shown in Table 3.3.3-1 shall be OPERABLE with their trip setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.3.3-2.

**APPLICABILITY:** As shown in Table 3.3.3-1.

**ACTION:**

- a. With an ECCS actuation instrumentation channel trip setpoint less conservative than the value shown in the Allowable Values column of Table 3.3.3-2, declare the channel inoperable until the channel is restored to OPERABLE status with its trip setpoint adjusted consistent with the Trip Setpoint value.
- b. With one or more ECCS actuation instrumentation channels inoperable, take the ACTION required by Table 3.3.3-1.

#### **SURVEILLANCE REQUIREMENTS**

---

- 4.3.3.1 Each ECCS actuation instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION operations for the OPERATIONAL CONDITIONS and at the frequencies shown in Table 4.3.3.1-1.
- 4.3.3.2 LOGIC SYSTEM FUNCTIONAL TESTS and simulated automatic operation of all channels shall be performed at least once per 18 months.
- 4.3.3.3 The ECCS RESPONSE TIME of each ECCS trip function shall be demonstrated to be within the limit at least once per 18 months. Each test shall include at least one channel per trip system such that all channels are tested at least once every N times 18 months where N is the total number of redundant channels in a specific ECCS trip system.

**TABLE 3.3.3-3  
EMERGENCY CORE COOLING SYSTEM RESPONSE TIMES**

**DELETED**



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

PENNSYLVANIA POWER & LIGHT COMPANY

ALLEGHENY ELECTRIC COOPERATIVE, INC.

DOCKET NO. 50-388

SUSQUEHANNA STEAM ELECTRIC STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 118  
License No. NPF-22

1. The Nuclear Regulatory Commission (the Commission or the NRC) having found that:
  - A. The application for the amendment filed by the Pennsylvania Power & Light Company, dated April 10, 1995, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the regulations of the Commission;
  - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied,

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of the Facility Operating License No. NPF-22 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 118 and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. PP&L shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and is to be implemented within 30 days after its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



John F. Stolz, Director  
Project Directorate I-2  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical  
Specifications

Date of Issuance: July 11, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 118

FACILITY OPERATING LICENSE NO. NPF-22

DOCKET NO. 50-388

Replace the following pages of the Appendix A Technical Specifications with enclosed pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change.

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### **3/4.3 INSTRUMENTATION**

#### **3/4.3.1 REACTOR PROTECTION SYSTEM INSTRUMENTATION**

##### **LIMITING CONDITION FOR OPERATION**

---

3.3.1 As a minimum, the reactor protection system instrumentation channels shown in Table 3.3.1-1 shall be OPERABLE.

**APPLICABILITY:** As shown in Table 3.3.1-1.

**ACTION:**

- a. With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip System requirement for one trip system:
  1. If placing the inoperable channel(s) in the tripped condition would cause a scram, the inoperable channel(s) shall be restored to OPERABLE status within 6 hours or the ACTION required by Table 3.3.1-1 for the affected Functional Unit shall be taken; or
  2. If placing the inoperable channel(s) in the tripped condition would not cause a scram, place the inoperable channel(s) and/or that trip system in the tripped condition within 12 hours.
- b. With the number of OPERABLE channels less than required by the Minimum OPERABLE channels per Trip System requirement for both trip systems, place at least one trip system\* in the tripped condition within 1 hour and take the ACTION required by Table 3.3.1-1. The provisions of Specification 3.0.4 are not applicable for entry into Operational Condition 2 or 3 from Operational Condition 1 for the IRMs or the Neutron Flux - Upscale, Setdown function of the APRMs.

##### **SURVEILLANCE REQUIREMENTS**

---

- 4.3.1.1 Each reactor protection system instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION operations for the OPERATIONAL CONDITIONS and at the frequencies shown in Table 4.3.1.1-1.
- 4.3.1.2 LOGIC SYSTEM FUNCTIONAL TESTS and simulated automatic operation of all channels shall be performed at least once per 18 months.
- 4.3.1.3 The REACTOR PROTECTION SYSTEM RESPONSE TIME of each reactor trip functional unit shall be demonstrated to be within its limit at least once per 18 months.\*\* Each test shall include at least one channel per trip system such that all channels are tested at least once every N times 18 months where N is the total number of redundant channels in a specific reactor trip system.
- 4.3.1.4 The provisions of Specification 4.0.4 are not applicable for entry into Operational Condition 2 or 3 from Operational Condition 1 for the IRMs or the Neutron Flux - Upscale, Setdown function of the APRMs.

---

\* If more channels are inoperable in one trip system than in the other, place the trip system with more inoperable channels in the tripped condition, except when this would cause a scram to occur.

\*\* Neutron detectors are exempt from response time testing.

**TABLE 3.3.1-2  
REACTOR PROTECTION SYSTEM RESPONSE TIMES**

**DELETED**

## **INSTRUMENTATION**

### **3/4.3.2 ISOLATION ACTUATION INSTRUMENTATION**

#### **LIMITING CONDITION FOR OPERATION**

---

3.3.2 The isolation actuation instrumentation channels shown in Table 3.3.2-1 shall be OPERABLE with their trip setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.3.2-2.

**APPLICABILITY:** As shown in Table 3.3.2-1.

**ACTION:**

- a. With an isolation actuation instrumentation channel trip setpoint less conservative than the value shown in the Allowable Values column of Table 3.3.2-2, declare the channel inoperable until the channel is restored to OPERABLE status with its trip setpoint adjusted consistent with the Trip Setpoint value.
- b. With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip System requirement for one trip system, place the inoperable channel(s) and/or that trip system in the tripped condition\* within 1 hour. The provisions of Specification 3.0.4 are not applicable.
- c. With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip System requirement for both trip systems, place at least one trip system\*\* in the tripped condition within 1 hour and take the ACTION required by Table 3.3.2-1.

---

\* An inoperable channel need not be placed in the tripped condition where this would cause the Trip Function to occur. In these cases, the inoperable channel shall be restored to OPERABLE status within 2 hours or the ACTION required by Table 3.3.2-1 for that Trip Function shall be taken. In addition, for the HPCI system and RCIC system isolation, provided that the redundant isolation valve, inboard or outboard, as applicable, in each line is OPERABLE and all required actuation instrumentation for that valve is OPERABLE, one inoperable channel need not be placed in the tripped condition where this would cause the Trip Function to occur. In these cases, for the HPCI and RCIC systems, the inoperable channel shall be restored to OPERABLE status within 8 hours or the ACTION required by Table 3.3.2-1 for that trip Function shall be taken.

\*\* If more channels are inoperable in one trip system than in the other, place the trip system with more inoperable channels in the tripped condition, except when this would cause the Trip Function to occur.

## **INSTRUMENTATION**

### **SURVEILLANCE REQUIREMENTS**

---

- 4.3.2.1 Each isolation actuation instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION operations for the OPERATIONAL CONDITIONS and at the frequencies shown in Table 4.3.2.1-1.
- 4.3.2.2 LOGIC SYSTEM FUNCTIONAL TESTS and simulated automatic operation of all channels shall be performed at least once per 18 months.
- 4.3.2.3 The ISOLATION SYSTEM RESPONSE TIME of each isolation trip function shall be demonstrated to be within its limit at least once per 18 months.<sup>\*\*\*</sup> Each test shall include at least one channel per trip system such that all channels are tested at least once every N times 18 months, where N is the total number of redundant channels in a specific isolation trip system.

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<sup>\*\*\*</sup> Neutron detectors are exempt from response time testing.

**TABLE 3.3.2-3  
ISOLATION SYSTEM INSTRUMENTATION RESPONSE TIME**

**DELETED**

**TABLE 3.3.2-3 (Continued)**  
**ISOLATION SYSTEM INSTRUMENTATION RESPONSE TIME**

**DELETED**

## **INSTRUMENTATION**

### **3/4.3.3 EMERGENCY CORE COOLING SYSTEM ACTUATION INSTRUMENTATION**

#### **LIMITING CONDITION FOR OPERATION**

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3.3.3 The emergency core cooling system (ECCS) actuation instrumentation channels shown in Table 3.3.3-1 shall be **OPERABLE** with their trip setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.3.3-2.

**APPLICABILITY:** As shown in Table 3.3.3-1.

**ACTION:**

- a. With an ECCS actuation instrumentation channel trip setpoint less conservative than the value shown in the Allowable Values column of Table 3.3.3-2, declare the channel inoperable until the channel is restored to **OPERABLE** status with its trip setpoint adjusted consistent with the Trip Setpoint value.
- b. With one or more ECCS actuation instrumentation channels inoperable, take the **ACTION** required by Table 3.3.3-1.

#### **SURVEILLANCE REQUIREMENTS**

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- 4.3.3.1 Each ECCS actuation instrumentation channel shall be demonstrated **OPERABLE** by the performance of the **CHANNEL CHECK**, **CHANNEL FUNCTIONAL TEST** and **CHANNEL CALIBRATION** operations for the **OPERATIONAL CONDITIONS** and at the frequencies shown in Table 4.3.3.1-1.
- 4.3.3.2 **LOGIC SYSTEM FUNCTIONAL TESTS** and simulated automatic operation of all channels shall be performed at least once per 18 months.
- 4.3.3.3 The **ECCS RESPONSE TIME** of each ECCS trip function shall be demonstrated to be within the limit at least once per 18 months. Each test shall include at least one channel per trip system such that all channels are tested at least once every N times 18 months where N is the total number of redundant channels in a specific ECCS trip system.

**TABLE 3.3.3-3  
EMERGENCY CORE COOLING SYSTEM RESPONSE TIMES**

**DELETED**



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 148 TO FACILITY OPERATING LICENSE NO. NPF-14

AMENDMENT NO. 118 TO FACILITY OPERATING LICENSE NO. NPF-22

PENNSYLVANIA POWER & LIGHT COMPANY

ALLEGHENY ELECTRIC COOPERATIVE, INC.

SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2

DOCKET NOS. 50-387 AND 388

1.0 INTRODUCTION

By letter dated April 10, 1995, the Pennsylvania Power and Light Company (the licensee) submitted a request for changes to the Susquehanna Steam Electric Station, Units 1 and 2, Technical Specifications (TS). The requested changes would remove from the Susquehanna Steam Electric Station, Units 1 and 2 Technical Specifications, the response time limit Tables 3.3.1-2, 3.3.2-3, and 3.3.3-3, for the reactor protection system (RPS), the isolation system instrumentation, and the emergency core cooling system (ECCS). The information in the tables is being added to the Final Safety Analysis Report (FSAR) in accordance with the guidance in Generic Letter (GL) 93-08, "Relocation of Technical Specification Tables of Instrument Response Time Limits," dated December 29, 1993. The NRC provided guidance on the proposed TS changes in GL 93-08 to all holders of operating licenses or construction permits for nuclear power reactors. The next revision to update the FSAR will include these tables.

2.0 BACKGROUND

The NRC staff undertook efforts in the early 1980's to address problems related to the content of nuclear power plant technical specifications. These projects have resulted in the issuance of various reports, proposed rulemakings, and Commission policy statements. Line item improvements became a mechanism for technical specification improvement as part of the implementation of the Commission's interim policy statement on technical specification improvements published on February 6, 1987 (52 FR 3788). The final Commission policy statement on technical specification improvements was published July 22, 1993 (58 FR 39132). The final policy statement provided criteria which can be used to establish, more clearly, the framework for technical specifications. The staff has maintained the line item improvement process, through the issuance of generic letters, in order to improve the content and consistency of technical specifications and to reduce the licensee and staff resources required to process amendments related to those specifications being relocated from the TS to other licensee documents as a result of the implementation of the Commission's final policy statement.

Section 50.36 of Title 10 of the Code of Federal Regulations establishes the regulatory requirements for licensees to include technical specifications as part of applications for operating licenses. The rule requires that technical specifications include items in five specified categories: (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation; (3) surveillance requirements; (4) design features; and (5) administrative controls. In addition, the Commission's final policy statement on technical specification improvements and other Commission documents provide guidance regarding the required content of technical specifications. The fundamental purpose of the technical specifications, as described in the Commission's final policy statement, is to impose those conditions or limitations upon reactor operation necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety by identifying those features that are of controlling importance to safety and establishing on them certain conditions of operation which cannot be changed without prior Commission approval.

The Commission's final policy statement recognized, as had previous statements related to the staff's technical specification improvement program, that implementation of the policy would result in the relocation of existing technical specification requirements to licensee controlled documents such as the Final Safety Analysis Report. Those items relocated to the FSAR would in turn be controlled in accordance with the requirements of 10 CFR 50.59, "Changes, tests and experiments." Section 50.59 of Title 10 of the Code of Federal Regulations provides criteria to determine when facility or operating changes planned by a licensee require prior Commission approval in the form of a license amendment in order to address any unreviewed safety questions. NRC inspection and enforcement programs also enable the staff to monitor facility changes and licensee adherence to FSAR commitments and to take any remedial action that may be appropriate.

## 2.0 EVALUATION

The above noted Susquehanna Steam Electric Station (SSES) TS tables contain the values of the response time limits for the RPS, isolation system instrumentation, and the ECCS. The limiting conditions of operation of these systems and instrumentation specify that these systems shall be operable with response times as specified in these tables. These limits are the acceptance criteria for the response time testing performed to satisfy the surveillance requirements of IS 3.3.1, 3.3.2, and 3.3.3 for each applicable RPS, and ECCS instrumentation trip function and for each applicable isolation system actuation. These surveillances ensure that the response times of the RPS, isolation system, and ECCS instruments are consistent with the assumptions of the safety analyses performed for design basis accidents and transients. Currently, the license amendment process is the only way that TS changes for the RPS, isolation system, and ECCS instrumentation response time limits may be implemented. In contrast, the licensee may make changes to other conditions assumed in the safety analysis as described in the FSAR under the

provisions of Section 50.59 of Title 10 of the Code of Federal Regulations (10 CFR 50.59). The licensee may make changes to the FSAR without NRC approval when the changes do not result in an unreviewed safety question. The staff has concluded that the provisions of 10 CFR 50.59 provide an acceptable means to control changes to response time limits in lieu of a license amendment and that this can be accomplished by relocating the tables listed above from the TS to the FSAR. This is a change only in administrative requirements because it does not alter the TS requirements to perform response time tests or to ensure that the response times of the instruments are within their limits.

The licensee has proposed changes to specifications 3.3.1, 3.3.2, and 3.3.3 by removing the references to Tables 3.3.1-2, 3.3.2-3, and 3.3.3-3 and by removing these tables from the TS. The licensee has proposed to relocate the tables on response time limits to the FSAR by including them in the next periodic update to the FSAR. These actions are consistent with the guidance provided in GL 93-08. The staff has reviewed this matter and finds that the proposed changes to the TS for Susquehanna Steam Electric Station, Units 1 and 2 are acceptable.

The staff's determination is based on the fact that the removal of the specific response time tables does not eliminate the requirements for the licensee to ensure that the protection instrumentation is capable of performing its safety function. Although the tables containing the specific response time requirements are relocated from the technical specifications to the FSAR, the licensee must continue to evaluate any changes to response time requirements in accordance with 10 CFR 50.59. Should the licensee's determination conclude that an unreviewed safety question is involved, due to either (1) an increase in the probability or consequences of accidents or malfunctions of equipment important to safety, (2) the creation of a possibility for an accident or malfunction of a different type than any evaluated previously, or (3) a reduction in the margin of safety, NRC approval and a license amendment would be required prior to implementation of the change.

The staff's review concluded that 10 CFR 50.36 does not require the response time tables to be retained in technical specifications. Requirements related to the operability, applicability, and surveillance requirements, including performance of testing to ensure response times for RPS, ECCS, and isolation system instrumentation, are retained due to those systems' importance in mitigating the consequences of an accident. However, the staff determined that the inclusion of specific response time requirements for the various instrumentation channels and components addressed by Generic Letter 93-08 was not required. The response times are considered to be an operational detail related to the licensee's safety analyses which are adequately controlled by the requirements of 10 CFR 50.59. Therefore, the continued processing of license amendments related to revisions of the affected instrument or component response times, where the revisions to those requirements do not involve an unreviewed safety question under 10 CFR 50.59, would afford no significant benefit with regard to protecting the public health and safety.

Further, the response time requirements do not constitute a condition or limitation on operation necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety, in that the ability of the instrumentation systems to perform their safety functions are not adversely impacted by the relocation of the response time tables from the TS to the FSAR.

### 3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Pennsylvania State official was notified of the proposed issuance of the amendments. The State official had no comments.

### 4.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (60 FR 29887). Accordingly, the amendments meet eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

### 5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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