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. M89159 AND M89160)

Dear Mr. Byram:

The Commission has issued the enclosed Amendment No. 137 to Facility Operating License No. NPF-14 and Amendment No. 107 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 5, 1994.

These amendments delete the frequency requirements for a number of audits listed under Technical Specification 6.5.2.8 and also remove the audit requirements for the Emergency Plan and the Security Plan since these requirements have been added to the respective plan documents.

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

Sincerely, /S/

CGrimes

SB1ack

ACRS(4)

OC/LFDCB

OPA

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

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Docket Nos. 50-387/388

Enclosures:

 Amendment No. 137 to License No. NPF-14

- 2. Amendment No. 107 to License No. NPF-22
- 3. Safety Evaluation

cc w/encls: See next page

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WASHINGTON, D.C. 20555-0001

December 22, 1994

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

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Sincerely,

Chester Poslusny Jr., Sr. Project Manager

Project Directorate 1-2

Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Docket Nos. 50-387/388

Enclosures:

1. Amendment No. 137 to License No. NPF-14

2. Amendment No. 107 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

cc:

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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. 137 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 5, 1994, 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) <u>Technical Specifications and Environmental Protection Plan</u>

The Technical Specifications contained in Appendix A, as revised through Amendment No. 137 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.

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: December 22, 1994

ATTACHMENT TO LICENSE AMENDMENT NO. 137

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	<u>INSERT</u>
6–12	6-12
6-13	6-13

REVIEW (Continued)

- d. Proposed changes to Appendix A Technical Specifications or this Operating License.
- e. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety.
- g. All REPORTABLE EVENTS.
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety.
- i. Reports and meetings minutes of the PORC.

AUDITS

- 6.5.2.8 Audits of unit activities shall be performed under the cognizance of the SRC. These audits shall encompass:
 - a. The conformance of unit operation to provisions contained within the Appendix A Technical Specifications and applicable license conditions.
 - b. The performance, training and qualifications of the entire unit staff.
 - c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems or method of operation that affect nuclear safety.
 - d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50.
 - e. Any other area of unit operation considered appropriate by the SRC or the Senior Vice President-Nuclear.
 - f. The Fire Protection Program and implementing procedures at least once per 24 months.

AUDITS (Continued)

- g. An independent fire protection and loss prevention inspection and audit shall be performed at least once per 12 months utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- h. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 36 months.
- i. The radiological environmental monitoring program and the results thereof.
- j. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures.
- k. The PROCESS CONTROL PROGRAM and implementing procedures for solidification of radioactive wastes.
- The performance of activities required by the Quality Assurance Program to meet the criteria of Regulatory Guide 4.15, December, 1977.

AUTHORITY

6.5.2.9 The SRC shall report to and advise the Senior Vice President - Nuclear on those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8.

RECORDS

- 6.5.2.10 Records of SRC activities shall be prepared, approved and distributed as indicated below:
 - a. Minutes of each SRC meeting shall be prepared, approved and forwarded to the Senior Vice President Nuclear within 14 days following each meeting.
 - b. Reports of reviews encompassed by Section 6.5.2.7 above, shall be prepared, approved and forwarded to the Senior Vice President - Nuclear within 14 days following completion of the review.
 - c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the Senior Vice President Nuclear and to the management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.



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. 107 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 5, 1994, 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. 107 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.

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: December 22, 1994

ATTACHMENT TO LICENSE AMENDMENT NO. 107

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.

<u>REMOVE</u>	<u>INSERT</u>
6-12	6-12
6-13	6-13

REVIEW (Continued)

- d. Proposed changes to Appendix A Technical Specifications or this Operating License.
- e. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety.
- g. All REPORTABLE EVENTS.
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety.
- i. Reports and meetings minutes of the PORC.

AUDITS

- 6.5.2.8 Audits of unit activities shall be performed under the cognizance of the SRC. These audits shall encompass:
 - a. The conformance of unit operation to provisions contained within the Appendix A Technical Specifications and applicable license conditions.
 - b. The performance, training and qualifications of the entire unit staff.
 - c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems or method of operation that affect nuclear safety.
 - d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix B, 10 CFR 50.
 - e. Any other area of unit operation considered appropriate by the SRC or the Senior Vice President-Nuclear.
 - f. The Fire Protection Program and implementing procedures at least once per 24 months.

AUDITS (Continued)

- g. An independent fire protection and loss prevention inspection and audit shall be performed at least once per 12 months utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- h. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 36 months.
- i. The radiological environmental monitoring program and the results thereof.
- j. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures.
- k. The PROCESS CONTROL PROGRAM and implementing procedures for solidification of radioactive wastes.
- I. The performance of activities required by the Quality Assurance Program to meet the criteria of Regulatory Guide 4.15, December, 1977.

AUTHORITY

6.5.2.9 The SRC shall report to and advise the Senior Vice President - Nuclear on those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8.

RECORDS

- 6.5.2.10 Records of SRC activities shall be prepared, approved and distributed as indicated below:
 - a. Minutes of each SRC meeting shall be prepared, approved and forwarded to the Senior Vice President Nuclear within 14 days following each meeting.
 - b. Reports of reviews encompassed by Section 6.5.2.7 above, shall be prepared, approved and forwarded to the Senior Vice President - Nuclear within 14 days following completion of the review.
 - c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the Senior Vice President - Nuclear and to the management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.



WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION RELATED TO AMENDMENT NO. 137 TO FACILITY OPERATING LICENSE NO. NPF-14 AMENDMENT NO. 107 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 5, 1994, 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 relocate control over changes to the frequency requirements for a number of audits listed under Technical Specification 6.5.2.8 and also remove the audit requirements for the Emergency Plan and the Security Plan since these requirements are adequately controlled by existing regulations.

2.0 EVALUATION

2.1 Deletion of References to Specific Audit Frequencies

Pennsylvania Power and Light Company (PP&L) proposes to delete the Susquehanna Review Committee (SRC) audit frequency for subsections a-d and h-n of 6.5.2.8 of the Susquehanna Steam Electric Station Units 1 and 2 TS as follows:

- (a) delete "at least once per 12 months" for audits of unit operations compliance with Appendix A Technical Specifications and applicable license conditions,
- (b) delete "at least once per 12 months" for audits of performance, training, and qualifications of unit staff,
- (c) delete "at least once per 6 months" for audits of results of actions taken to correct deficiencies occurring in unit equipment, structures, systems, or method of operation that affect nuclear safety,

- (d) delete "at least once per 24 months" for audits of the performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50,
- (h) delete "at least once per 24 months" for audits of the Fire Protection Program and implementing procedures,
- (i) delete "at least once per 12 months" for inspection and audits of an independent fire and loss prevention by either qualified offsite licensee personnel or an outside fire protection firm,
- (j) delete "at intervals no greater than 36 months" for inspection and audits of the fire protection and loss prevention by an outside qualified fire consultant,
- (k) delete "at least once per 12 months" for audits of the radiological environmental monitoring program and the results thereof,
- (1) delete "at least once per 24 months" for audits of the OFFSITE DOSE CALCULATION MANUAL and implementing procedures,
- (m) delete "at least once per 24 months" for audits of the PROCESS CONTROL PROGRAM and implementing procedures,
- (n) delete "at least once per 12 months" for audits of the performance of activities required by the Quality Assurance Program to meet the criteria of Regulatory Guide 4.15, December 1977.

The staff is still evaluating the proposed changes to audit frequencies listed in the TS relative to fire protection and loss prevention programs. Specifically, these are the deletions of audit frequencies from items (h), (i), and (j) of the current TS, (items (f) (g), and (h) of the revised TS included in the amendment request). The frequency deletions are not addressed in this safety evaluation, but will be addressed in a subsequent amendment. The current amendment only reflects a re-lettering of the three items related to fire protection audits.

The licensee proposes that the review and audit functions specified in the existing technical specifications be relocated to the Final Safety Analysis Report (FSAR) on the basis that changes to the audit frequencies will be adequately controlled under the Quality Assurance (QA) program. Specifically, the licensee has proposed to incorporate these audit frequencies in Section 13.4.3 and Table 17.2-1 of the FSAR, which incorporates these provisions into the QA program by reference. These TS provisions are not necessary to assure safe operation of the facility because Appendix B to Part 50 specifies broader requirements for all review and audit functions, except those associated with the security and emergency plans discussed below. This approach will result in an equivalent level of control while providing for a more appropriate change control process under 10 CFR 50.54(a).

2.2 Deletion of Emergency Plan and Security Plan Audits

PP&L proposes to delete TS 6.5.2.8 Subsection (e) which identifies audits of the Emergency Plan and implementing procedures at least once per 12 months, and Subsection (f) which identifies audits of the Security Plan and implementing procedures at least once per 12 months.

The licensee proposes to relocate the requirements to establish, implement, and maintain procedures related to the Emergency Plan and Security Plan. Since the Security Plan requirements are specified in 10 CFR 50.54, 73.40, 73.55, and 73.56 and the Emergency Plan requirements are specified in 10 CFR 50.54(q) and 10 CFR Part 50, Appendix E, Section V, the staff recommended, in Generic Letter 93-07, that these requirements be removed from the technical specifications and relocated to their respective plans.

The staff concludes that the requirements for emergency planning in 10 CFR 50.47, 50.54, 10 CFR Part 50 Appendix E and for security in 10 CFR 50.54 and 73.55, for drills, exercises, testing, and maintenance of the program, provide adequate assurance that the objective of the previous TS for a periodic review of the program and changes to the program will be met. Therefore, duplication of the requirements contained in the regulations would not enhance the level of safety for the facility. The staff concludes that other regulatory requirements provide sufficient control of these provisions and removing them from TS is acceptable.

The staff has concluded, therefore, that relocation of the audit requirements described above is acceptable because (1) their inclusion in technical specifications is not specifically required by 10 CFR 50.36 or other regulations, (2) these audit requirements are not required to avert an immediate threat to the public health and safety, and (3) changes to these requirements, as described in the applicable program description, will require prior NRC approval in accordance with §50.54(a), Appendix E to Part 50, §50.54(p), or §73.56(g), as applicable.

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 relate to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendments meet eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). 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.

Principal Contributor: C. Poslusny, Jr.

Date: December 22, 1994