



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20545

DEC 19 1984

Docket No.: 50-388

Mr. Norman W. Curtis
Vice President
Engineering and Construction
Pennsylvania Power & Light Company
2 North Ninth Street
Allentown, Pennsylvania 18101

Dear Mr. Curtis:

SUBJECT: Issuance of an Exemption to Facility Operating License No. NPF-22
Susquehanna Steam Electric Station, Unit 2

The U. S. Nuclear Regulatory Commission has issued the enclosed Exemption from the requirements of 10 CFR 50.44 Paragraph (c)(3)(i) to Facility Operating License No. NPF-22 for Susquehanna Steam Electric Station Unit 2 located in Luzerne County, Pennsylvania.

In a letter dated March 10, 1983, the NRC staff indicated that an exemption to 10 CFR 50.44(c)(3)(i), which relates to containment inerting, would not be necessary. Subsequently, the NRC staff has deemed it necessary to grant the enclosed exemption so that you meet not only the intent but the letter of this regulation.

A copy of the related safety evaluation supporting the Exemption is enclosed. Also enclosed is a copy of a related notice of environmental assessment and finding of no significant impact which was published in the Federal Register.

A copy of the Exemption is being filed with the Office of the Federal Register for publication.

Sincerely,

A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing

Enclosures:

1. Exemption
2. Safety Evaluation
3. Notice of Environmental Assessment

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A copy of the Exemption is being filed with the Office of the Federal Register for publication.

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Original signed by

A. Schwencer, Chief
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DISTRIBUTION
See Attached

*See previous concurrence

*LB#2/DL
MJCampagnone:dh
11/27/84

*LB#2/DL
EHylton
11/27/84

*OELD
Goldberg
11/29/84

*LB#2/DL
ASchwencer
11/27/84

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para *insert*
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DISTRIBUTION
See Attached

*Conditioned on not
extension to 50
exemption until notice of
no significant impact is published
in F.R.
published 12-13-87*

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M/Catrazzone:dh
11/27/84

LB#2/DL
EHyson
11/27/84

ELD
Goldberg
11/27/84

LB#2/DL
ASchwencer
11/27/84

Susquehanna

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UNITED STATE OF AMERICA
 NUCLEAR REGULATORY COMMISSION

In the Matter of
 Pennsylvania Power & Light Company

Susquehanna Steam Electric
 Station Unit 2

)
)
) Docket No. 50-388
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EXEMPTION

I.

The Pennsylvania Power and Light Co. (PP&L/the licensee) is the holder of Facility License No. NPF-22 which authorizes operation of Susquehanna Steam Electric Station Unit 2 (SSES-2) at power levels not in excess of 3293 megawatts thermal. The facility is a Boiling Water Reactor located at the licensee's site in Luzerne County, Pennsylvania. The license provides, among other things, that it is subject to all rules, regulations, and Orders of the Commission now or hereafter in effect.

II.

Inerting the containment for the SSES-2 plant is required by 10 CFR 50.44 (revised). In 10 CFR 50.44, "Standards for combustible gas control system in light-water-cooled power reactors," Section 50.44(c)(3)(i) states that, "Effective May 4, 1982 or 6 months after initial criticality, whichever is later, an inerted atmosphere shall be provided for each boiling light-water nuclear power reactor with a Mark I or Mark II type containment."

Since SSES -2 achieved its initial criticality on May 7, 1984, the plant is required to be inerted by November 8, 1984, per the 10 CFR 50.44 requirement set forth above. On October 27, 1984 SSES-2 was shut-down for a pre-commercial outage scheduled to last thru the end of December 1984. Prior to start-up presently scheduled for January 1985, the licensee needs an exemption so it may continue operating the plant with a non-inerted containment during the balance of the initial startup test program.

The exemption from the regulation is required in order to complete the balance of the power ascension test program (PATP) in accordance with the licensee's test plan. The licensee's test plan is based on maintaining the containment in a non-inerted condition until after completing the 100% rated thermal trip test, a condition which normally would be expected to occur within about 120 effective full power days of core burn-up. No changes are being made in the maximum full power days of core burn-up normally expected before inerting is required. In fact to assure this, the maximum expected value of 120 effective full power days is made part of the proposed action. The licensee's PATP schedule has not been maintained as originally planned. This has resulted in a simple stretch out of the time required to complete all post criticality PATP tests.

It is advantageous to operate the reactor without inerting during the PATP, as an uninerted containment would permit unscheduled inspections or identification of possible problems important to safety during this period. The anticipated high frequency of containment entries during the PATP period

and the required deinerting and re-inerting time (about 24 hours) would tend to discourage early and frequent containment entries for identifying and correcting any potential safety problems before they become serious safety problems.

III.

The NRC staff has evaluated the licensee's current schedule for completing the preoperational test program and believes that to now require inerting before the PATP tests have been completed could result in less assurance of safety, because of the added time and/or decreased ability to directly examine and evaluate components and systems inside containment while the PATP tests are under way. Completing the PATP tests with an uninerted containment then would reduce the likelihood of development of an event requiring protective safety actions both during the period of exemption and later. Because of the low level of fission product inventory during the PATP period, (less than 42 effective full power days (FPD) at present increasing to the maximum of only 120 FPD) and the short duration anticipated for the exemption (about 2-3 weeks of remaining PATP testing after start-up), there is an extremely low likelihood that the inerting system would be required.

Based on the information provided by the licensee and the staff's assurance that the remainder of the PATP tests will be performed in essentially the same manner as originally planned with respect to the magnitude

and duration of power levels for each remaining PATP test, the NRC staff concludes that there will be no increase in the risks of operation through completion of the PATP tests with the proposed limited exemption regarding initial inerting over the risks that were contemplated for the duration of the PATP tests at the time the plant was licensed. Therefore, since there is no perceived increased risk by the mere fact of extending the time allowed for completion of the PATP tests under uninerted conditions, the NRC staff finds that operation would be as safe under the conditions proposed by the exemption as it would have been had the tests been completed in the shorter calendar time of six months after initial criticality.

The inerting requirement resulted from a staff judgement that the safety benefits attributable to having an inerted containment during normal operations outweighed the associated disadvantages. This judgement does not prevail during the PATP because of the need for frequent containment entries for inspection and surveillance purposes. The staff finds that an exemption from 10 CFR 50.44, paragraph (c)(3)(i) is acceptable.

IV.

Accordingly, the Commission has determined that, pursuant to 10 CFR 50.12 the exemption is authorized by law, will not endanger life or property or the common defense and security and is otherwise in the public interest. Therefore, the Commission hereby grants the exemption as follows:

"An exemption is granted from the requirements of 10 CFR 50.44 Paragraph (c)(3)(i) until either the required 100 percent rated thermal power trip startup tests have been completed or the reactor has operated for 120 effective full power days, whichever is earlier."

Pursuant to 10 CFR 51.32, the Commission has determined that the issuance of the exemption will have no significant impact on the environment (49 FR 4862§).

A copy of the Commission's Safety Evaluation dated Dec. 19, 1984 related to this action is available for public inspection at the Commission's Public Document Room, 1717 H Street, N. W., Washington, D.C. and at the Osterhout Free Library, Reference Department, 71 South Franklin Street, Wilkes-Barre, Pennsylvania 18701.

This Exemption is effective upon issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Original signed by
Darrell G. Eisenhut

Darrell G. Eisenhut, Director
Division of Licensing, NRR

Dated at Bethesda, Maryland
this 19th day of December 1984.

DL:LB#2 MJ Campagnone 12/19/84	DL:LB#3 EM Ylton 12/19/84	DL:LB#2 ASchwencer 12/19/84	DL:ADL J Gray 12/29/84	DL:ADL T Novak 12/10/84	D/DE DE Eisenhut 12/18/84
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20545

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORT EXEMPTION FROM 10 CFR 50.44

FACILITY OPERATING LICENSE NO. NPF-22

PENNSYLVANIA POWER AND LIGHT COMPANY

LUZERNE COUNTY, PENNSYLVANIA

SUSQUEHANNA STEAM ELECTRIC STATION UNIT 2 (SSES-2)

DOCKET NO. 50-388

Introduction

Inerting the containment for the SSES-2 plant is required by 10 CFR 50.44 (revised). In 10 CFR 50.44, "Standards for Combustible Gas Control System in Light Water Cooled Power Reactors," Section 50.44 (c).(3).(i) states in part that, "Effective May 4, 1982 or 6 months after initial criticality, whichever is later, an inerted atmosphere shall be provided for each boiling light-water nuclear power reactor with a Mark I or Mark II type containment."

Evaluation

Since SSES-2 achieved its initial criticality on May 7, 1984, the plant is required to be inerted by November 8, 1984, per the 10 CFR 50.44 requirement set forth above. On October 27, 1984 SSES-2 shut-down for the precommercial outage scheduled to last through the end of December, 1984. Prior to start-up in January 1985, the licensee needs the exemption in order to complete about 2-3 weeks of the power ascension testing program (PATP). This requires that the licensee receive a temporary exemption from the requirement of 10 CFR 50.44 so that it may continue operating the plant with a non-inerted containment during the balance of the initial startup test program as originally planned.

The proposed exemption from the regulation is required in order to complete the balance of the PATP in accordance with the licensee's test plan. The licensee's test plan is based on maintaining the containment in a non-inerted condition until after completing the 100% rated thermal trip test, a condition which normally would be expected to occur within about 120 effective full power days of core burn-up. No changes are being made in maximum full power days of core burn-up normally expected before inerting is required. In fact to assure this, the maximum expected value of 120 effective full power days is made part of the proposed action. The licensee's PATP schedule has not been maintained as originally planned. This has resulted in a simple stretch out to the time required to complete all post criticality PATP tests.

It is advantageous to operate the reactor without inerting during the PATP, as an uninerted containment would permit unscheduled inspections or identi-

fication of possible problems important to safety during this period. The anticipated high frequency of containment entries during the PATP period and the required deinerting and re-inerting time (about 24 hours) would tend to discourage early and frequent containment entries for identifying and correcting any potential safety problems before they become serious safety problems.

Further, the NRC staff believes that to now require inerting before the PATP tests have been completed could result in less assurance of safety, because of the added time and/or decreased ability to directly examine and evaluate components and systems inside containment while the PATP tests are under way. Completing the PATP tests with an uninerted containment (exemption granted) then would reduce the likelihood of development of an event requiring protective safety actions both during the period of exemption and later. Because of the low level of fission product inventory during the PATP period, (less than 42 effective full power days at present increasing to the maximum of only 120 FPD) and the short duration anticipated for the exemption (about 2-3 weeks after start-up), there is an extremely low likelihood that the inerting system would be required.

Based on the information provided by the licensee and the staff's assurance that the remainder of the PATP tests will be performed in essentially the same manner as originally planned with respect to the magnitude and duration of power levels for each remaining PATP test, the NRC staff concludes that there will be no increase in the risks of operation through completion of the PATP tests with the proposed limited exemption regarding initial inerting over the risks that were contemplated for the duration of the PATP tests at the time the plant was licensed. Therefore, since there is no perceived increase in risk by the mere fact of extending the time allowed for completion of the PATP tests under uninerted conditions, the NRC staff finds that operation would be as safe under the conditions proposed by the exemption as it would have been had the test been completed in the shorter calendar time of six months after initial criticality.

After the containment has once been inerted, inspection personnel entering the containment after it has then been deinerted may be in some danger, because of the possibility that non-breathable nitrogen pockets may remain if the operator fails to initiate the mixing system. These risks are minimized during normal plant operation. However, during PATP, the risk is greater due to the large number of personnel entries into the containment.

The inerting requirement resulted from a staff judgement that the safety benefits attributable to having an inerted containment during normal operations outweighed the associated disadvantages. This judgement does not prevail during the PATP because of the need for frequent containment entries for inspection and surveillance purposes. The staff finds that the proposed exemption from 10 CFR 50.44, paragraph (c)(3)(i) is acceptable.

With regard to the stage of the facility's life, SSES-2 construction is complete and the PATP is in progress. Absent the exemption and consequent authorization to continue the PATP with deinerted containment atmosphere, access to containment will be severely restricted. Frequent containment entries are required during PATP to adjust control systems, calibrate

instruments and monitor containment conditions as the plant ascends in power. Without the requested exemption, considerable delay to deinert and reinert before and after containment entries will be encountered. At this point in the PATP, to require inerting would significantly extend the time to complete the PATP and, therefore, delay commercial operation. The stage of the facility's life would appear to favor issuance of the exemption.

The regulatory requirement from which the exemption is sought anticipated that power ascension test programs could be completed within six months and consequently the core fission product inventory that would build up over the life of the program was acceptable. While the regulation contemplated a six month period, typical BWR programs have proven to actually require an average of 330 days. With this simple stretch in time, no significant increase in core inventory occurs and the same effective core history is experienced. Accordingly, for the reasons stated above, frequent containment entries, and the potential danger to the health and safety of plant operators, the staff finds that the containment should remain deinerted until completion of the PATP. Therefore, the equities lie in favor of granting the exemption.

Finally, while the public interest favors adherence to the Commission's regulations, the staff has concluded that in this instance an exemption from compliance with 10 CFR 50.44 for containment inerting has no adverse safety significance (as noted above). Therefore, the granting of this exemption will have no effect on the public health and safety and will also promote efficient and expeditious testing of facility components and systems, and should therefore be granted.

The staff has concluded that the exemption from the requirements of 10 CFR 50.44 paragraph (c).(3).(i) as discussed above is authorized by law, will not endanger life or property or the common defense and security and is otherwise in the public interest.

This involves an exemption from the requirement of 10 CFR 50.44. Because an exemption is involved, pursuant to 10 CFR 51.21, an environmental assessment and finding of no significant impact was prepared in connection with the issuance of this exemption.

Conclusion

Based on the considerations discussed above, we have concluded that the proposed temporary exemption from 10 CFR 50.44(c)(3)(i) is authorized by law, will not endanger life or property or the common defense and is otherwise in the public interest and should be granted.

Dated: December 19, 1984

Previous concurrences concurred on by*:

LB#2/DL	LB#2/DL	CSB/DSI	CSB/DSI	AD/RS
*MJCampagnone:dh	*ASchwencer	*FEltawila	*WButler	*WHouston
11/26/84	11/26/84	11/26/84	11/26/84	11/26/84

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The regulatory requirement from which the exemption is sought anticipated that power ascension test programs could be completed within six months and consequently the core fission product inventory that would build up over the life of the program was acceptable. While the regulation contemplated a six month period, typical BWR programs have proven to actually require an average of 330 days. With this simple stretch in time, no significant increase in core inventory occurs and the same effective core history is experienced. Accordingly, for the reasons stated above, frequent containment entries, and the potential danger to the health and safety of plant operators, the staff finds that the containment should remain deinvert until completion of the PATP. Therefore, the equities lie in favor of granting the exemption.

Finally, while the public interest favors adherence to the Commission's regulations, the staff has concluded that in this instance an exemption from compliance with 10 CFR 50.44 for containment inerting has no adverse safety significance (as noted above). Therefore, the granting of this exemption will have no effect on the public health and safety and will also promote efficient and expeditious testing of facility components and systems, and should therefore be granted.

The staff has concluded that the exemption from the requirements of 10 CFR 50.44 paragraph (c).(3).(i) as discussed above is authorized by law, will not endanger life or property or the common defense and security and is otherwise in the public interest.

This involves an exemption from the requirement of 10 CFR 50.44. Because an exemption is involved, pursuant to 10 CFR 51.21, an environmental assessment and finding of no significant impact was prepared in connection with the issuance of this exemption.

Conclusion

With respect to this exemption, we have concluded, based on the considerations discussed above, that, there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and such activities will be conducted in compliance with the Commission's regulations and the issuance of this exemption will not be inimical to the common defense and security of the health and safety of the public.

See previous concurrence

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MJCampagnone:dh
11/26/84

LB#2/DL
ASchwencer
11/26/84

ACSB/DSI
Feltawila
11/26/84

CSB/DSI
WButler
11/26/84

AD/RA
WHouston
11/26/84

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No internal inconsistencies in the regulation are apparent and in this instance, this factor appears to weigh neither in favor or nor against a finding of exigent circumstances and issuance of the exemption.

The regulatory requirement form which the exemption is sought anticipated that power ascension test programs could be completed within six months and consequently the core fission product inventory that would build up over the life of the program was acceptable. While the regulation contemplated a six month period, typical BWR programs have proven to actually require an average of 330 days. With this sample stretch in time, no significant increase in core inventory occurs and the same effective core history is experienced. Accordingly, for the reasons stated above, frequent containment entries, and the potential danger to the health and safety of plant operators, the staff finds that the containment should remain deinerted until completion of the PATP. Therefore, the equities lie in favor of granting the exemption.

Finally, while the public interest favors adherence to the Commission's regulations, the staff has concluded that in this instance, where an exemption from compliance with 10 CFR 50.44 for containment inerting has no adverse safety significance (as noted above). Therefore, the granting of this exemption will have no effect on the public health and safety and will also efficient and expeditious testing of facility components and systems, and should therefore be granted.

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This involves an exemption from the requirement of 10 CFR 50.44. Because an exemption is involved, pursuant to 10 CFR 51.21, an environmental assessment and finding of no significant impact was prepared in connection with the issuance of this exemption.

Conclusion

With respect to this exemption, we have concluded, based on the considerations discussed above, that there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and such activities ~~will be conducted in compliance with the Commission's regulations~~ and the issuance of this exemption will not be inimical to the common defense and security of the health and safety of the public.

<i>LB#2/DL</i>	<i>ASB</i> LB#2/DL	<i>CSB/DSI</i>	<i>CSB/DSI</i>	<i>AD/RS</i>
<i>MJ Campagnone:dh</i>	ASchwencer	FEltawila	WButler	WHouston
<i>11/20/84</i>	11/26/84	11/20/84	11/26/84	11/ /84

UNITED STATES NUCLEAR REGULATORY COMMISSION

PENNSYLVANIA POWER AND LIGHT COMPANY

DOCKET NO. 50-388

NOTICE OF ENVIRONMENTAL ASSESSMENT AND FINDING OF

NO SIGNIFICANT IMPACT

The U. S. Nuclear Regulatory Commission (The Commission) is considering issuance of an exemption to Facility Operating License No. NPF-22, issued to Pennsylvania Power and Light Company (the licensee), for operation of the Susquehanna Steam Electric Station Unit 2, located in Luzerne County, Pennsylvania.

ENVIRONMENTAL ASSESSMENT

Identification of Proposed Action: This exemption would allow suspension of containment inerting during the Power Ascension Test Program (PATP) until either the required 100% of rated thermal power trip tests have been completed or the reactor has operated for 120 effective full power days, whichever occurs earlier and would also allow exemption from the requirement stated in 10 CFR 50.44, paragraph (C)(3)(i) which states: "Effective May 4, 1982 or 6 months after initial criticality, whichever is later, an inerted atmosphere shall be provided for each boiling light-water nuclear power reactor with a Mark I or Mark II type containment."

The Need for the Proposed Action: The proposed exemption from the regulation is required in order to complete the balance of the power ascension test program (PATP) in accordance with the approved test plan. The approved test plan is based on maintaining the containment in a non-inerted condition until after completing the 100% rated thermal trip test, a condition which normally would be expected to occur within about 120 effective full power days of

core burn-up. On October 27, 1984, SSES-2 was shut-down for a pre-commercial outage expected to last thru the end of December 1984. Also, the licensee's PATP schedule for SSES-2 has not been maintained as originally planned. This has resulted in a simple stretch out of the time required to complete all post criticality PATP tests. These two factors combined, have created the need to extend the period of non-inerted PATP operations beyond the calendar time of six months provided by 10 CFR 50.44.

Environmental Impacts of the Proposed Action: There are no environmental impacts of the proposed action. No changes are being made in the maximum full power days of core burn-up normally expected before inerting is required. In fact to assure this, the maximum expected value of 120 effective full power days is made part of the proposed action. The purpose of allowing an initial period of non-inerted operations has been and continues to be, to permit ready access to systems and components inside containment during the period of the initial plant power ascension test program. When these tests have been completed, which occurs essentially at the point where the full rated thermal power trip tests of the PATP have been completed, the exemption from 10 CFR 50.44 is no longer applicable. Thus, should a release occur during the extended PATP it would not be greater than any release contemplated during the originally scheduled PATP. Also, there is nothing in the proposed change that would suggest that the probability of release would be increased. Further, the proposed change does not otherwise affect radiological plant effluents, nor any significant occupational exposures. Therefore, the Commission concludes that there are no significant radiological environmental impacts associated with this proposed amendment.

Alternative to the Proposed Action: Since we have concluded that there is no measurable environmental impact associated with the granting of the proposed exemption, any alternative to this exemption will have the same or greater environmental impact.

The principal alternative would be to deny the exemption which would reduce operational flexibility.

Alternative Use of Resources: This action does not involve the use of resources not previously considered in connection with the "Final Environmental Statement" related to the operation of Susquehanna Steam Electric Station Units 1 and 2 dated June 1981.

Agencies and Persons Consulted: The NRC staff reviewed the licensee's position and did not consult other agencies or persons.

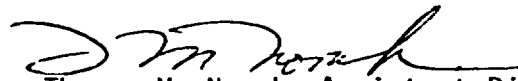
FINDINGS OF NO SIGNIFICANT IMPACT

The Commission has determined not to prepare an environmental impact statement for the proposed exemption.

Based upon the foregoing environmental assessment, we conclude that the proposed action will not have a significant effect on the quality of the human environment.

Dated at Bethesda, Maryland this 10th day of December 1984.

FOR THE NUCLEAR REGULATORY COMMISSION


Thomas M. Novak, Assistant Director
for Licensing
Division of Licensing
Office of Nuclear Reactor Regulation

ISSUANCE OF AN EXEMPTION TO FACILITY OPERATING LICENSE NO. NPF-22, SUSQUEHANNA
STEAM ELECTRIC STATION UNIT 2

DISTRIBUTION

Docket File

NRC PDR

Local PDR

PRC System

NSIC

LB#2 Reading

EHylton

MCampagnone

TNovak

JSaltzman, SAB

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CMiles

HDenton

JRutbert

ATOalson

WMiller, LFMB

RHeischman

EJordan

LHarman

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