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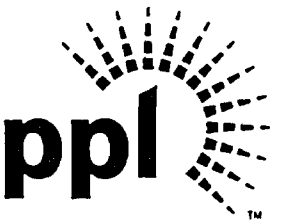

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U.S. Nuclear Regulatory Commission
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Washington, DC 20555

SUSQUEHANNA STEAM ELECTRIC STATION
PROPOSED AMENDMENT NO. 238 TO UNIT 2 LICENSE NFP-22: EDITORIAL CHANGE TO TECHNICAL SPECIFICATION TABLE 3.3.5.1-1
PLA-5850 **Docket No. 50-388**

The purpose of this letter is to propose an editorial/administrative revision to the PPL Susquehanna Unit 2 Technical Specification (TS) Table 3.3.5.1-1 "Emergency Core Cooling System Instrumentation." This change only involves revising Unit 2 TS Table 3.3.5.1-1 to correct a typographical error related to HPCI System Function 3.e "Manual Initiation." The change is not technical, has no safety significance, and does not involve any new commitments.

In accordance with Administrative Letter 98-10, "Dispositioning Specifications that are Insufficient to Assure Plant Safety," revised Technical Specification Bases have also been developed to remove administrative direction previously provided to plant operators for their use until this proposed TS change is approved by NRC.

The proposed change has been approved by the Susquehanna SES Plant Operations Review Committee and reviewed by the Susquehanna Review Committee. In accordance with 10 CFR 50.91(b)(1), PPL is sending a copy of this letter to the Pennsylvania Department of Environmental Protection.

If you have any questions, please contact Mr. Duane L. Filchner at (610) 774-7819.

A 001

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 1-28-05

B. T. McKinney

Enclosure: PPL Evaluation of the Proposed Change

Attachments:

Attachment A - Proposed Technical Specification Change for Table 3.3.5.1-1 (Mark-up)
Attachment B - Proposed Technical Specification Bases Change for Section 3.3.5.1
(Mark-up for Information Only)

copy: NRC Region I
Mr. A. J. Blamey, NRC Sr. Resident Inspector
Mr. R. V. Guzman, NRC Project Manager
Mr. D. J. Allard, PA DEP

Enclosure to PLA-5850

PPL Evaluation of the Proposed Change

PPL EVALUATION

1.0 DESCRIPTION

This is a request to amend Operating License NPF-22 for PPL Susquehanna, LLC (PPL), Susquehanna Steam Electric Station (SSES) Unit 2.

The proposed change is to the Unit 2 Technical Specification Table 3.3.5.1-1. This is an editorial revision to correct a typographical error that has been present since PPL converted to the Improved Technical Specifications in 1998. This change is not technical in nature and has no safety significance.

In addition, interim administrative direction previously added to the Technical Specification Bases Section 3.3.5.1, Subsections for Actions C.1 and C.2, and Actions D.1, D.2.1, and D.2.2, will be removed upon approval of this change.

2.0 PROPOSED CHANGE

Unit 2 TS Table 3.3.5.1-1 is revised to change Function 3.e "HPCI System," Conditions Referenced from Required Action A.1 from "D" to "C." The Unit 2 Technical Specification Bases were previously revised to provide interim administrative direction to plant operators that Action C is the correct action relative to this typographical error and should be controlled as such until the NRC approves this proposed TS as a license amendment.

3.0 BACKGROUND

The typographical error in Unit 2 TS Table 3.3.5.1-1 is documented in the PPL Corrective Action Process. The corrective action is to change the table and process a license amendment request for this Technical Specification deficiency under Administrative Letter 98-10 "Dispositioning Specifications that are Insufficient to Assure Plant Safety." In accordance with Administrative Letter 98-10, the Technical Specification Bases have also been revised to provide administrative direction to plant operators until this proposed TS change is approved as a license amendment.

4.0 TECHNICAL ANALYSIS

The proposed change to the Unit 2 TS Table 3.3.5.1 corrects a typographical error that occurred when preparing the response to an NRC Request for Additional Information during the review of documents PPL submitted to the NRC for the conversion to the Improved Technical Specifications. This proposed change is administrative in nature.

PPL's original Improved Technical Specification submittal to the NRC established that Action C was the appropriate Action for the Technical Specification Table 3.3.5.1-1 HPCI Manual Initiation Function on both Units 1 and 2. A subsequent submittal (to correct the table regarding Unit 2 Suppression Pool Water – High Level) resulted in an inadvertent change to make the required Action "D" for the HPCI Manual Initiation function in Unit 2 Table 3.3.5.1-1.

A review of the change history to Unit 2 TS Table 3.3.5.1-1 confirms that Action "C" is the correct Action to be referenced for HPCI Function 3.e Manual Initiation. Upon a loss of Manual Initiation capability for HPCI, Unit 2 Table 3.3.5.1-1 should direct that Action C is applicable, consistent with Unit 1 Table 3.3.5.1-1. This is consistent with the original intent of the Technical Specifications and also with the NUREG 1433 Standard Technical Specifications that were the basis for conversion to the Improved Technical Specifications. Although Action C.1 is not applicable to HPCI Manual Initiation, Action C.2 allows for the loss of HPCI manual initiation capability up to 24 hours whenever reactor steam dome pressure is greater than 150 psig.

Action D.1 is related to the Condensate Storage Low Level function and is only applicable if the HPCI pump suction is not aligned to the Suppression Pool. When HPCI is aligned to the Suppression Pool, the Condensate Storage Tank Level is not an issue for HPCI operation. Actions D.2.1, and D.2.2 are intended to allow up to 24 hours to realign HPCI to the suppression pool. Therefore, none of the Actions "D" are concerned with HPCI system manual initiation.

Based on the above, it is concluded that Action C is the appropriate reference for HPCI Function 3.e, Manual Initiation, in Unit 2 Technical Specification Table 3.3.5.1-1.

The Technical Specification Bases Section 3.3.5.1, Subsections for Actions C.1 & C.2, and Actions D.1, D.2.1, and D.2.2 have also been revised to provide interim administrative direction to plant operators until the proposed Technical Specification change to TS Table 3.3.5.1-1 is approved by the NRC. There are no changes to plant design or operation as a result of this direction. The intent of the direction is to rectify a discrepancy between Unit 1 and Unit 2 Technical Specifications via administrative control in accordance with Administrative Letter 98-10, "Dispositioning of Technical Specification that are Insufficient to Assure Plant Safety."

5.0 REGULATORY SAFETY ANALYSIS

5.1 No Significant Hazards Consideration

PPL Susquehanna, LLC (PPL) has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. **Does the proposed change involve a significant increase in the probability of occurrence or consequences of an accident previously evaluated?**

   Response: No.

   The proposed change to the Unit 2 TS Table 3.3.5.1 provides a correction to a typographical error that occurred when preparing a change to Unit 2 Technical Specification Table 3.3.5.1-1 in the response to an NRC Request for Additional Information (RAI). The request was initiated during NRC review of documents submitted by PPL for the conversion to the Improved Technical Specifications. This proposed change is considered to be administrative in nature because it was originally submitted correctly and was inadvertently changed in response to the RAI.

   Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. **Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?**

   Response: No.

   As stated above, the proposed change to the Unit 2 TS Table 3.3.5.1 provides a correction to a typographical error that occurred when preparing the response to an NRC Request for Additional Information. The request was initiated by the NRC during its review of documents submitted by PPL for the conversion to the Improved Technical Specifications. This proposed change is administrative in nature.

   Therefore, these proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

Again, the proposed change to the Unit 2 TS Table 3.3.5.1 provides a correction to a typographical error that occurred when preparing the response to an NRC Request for Additional Information. The request was initiated by the NRC during its review of documents submitted by PPL for the conversion to the Improved Technical Specifications. This proposed change is administrative in nature.

Therefore, these proposed changes do not involve a significant reduction in a margin of safety.

Based on the above, PPL concludes that the proposed changes present no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

5.2 Applicable Regulatory Requirements/Criteria

SSES FSAR Sections 3.1 and 3.13 provide detailed discussion of SSES compliance with the applicable regulatory requirements and guidance. The proposed TS amendment:

(a) Does not alter the design or function of any system;
(b) Does not result in any change in the qualifications of any component; and
(c) Does not result in the reclassification of any component's status in the areas of shared, safety-related, independent, redundant, and physically or electrically separated.

Based on the considerations discussed above, (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 amendment will not be inimical to the common defense and security or to the health and safety of the public.

6.0 ENVIRONMENTAL CONSIDERATIONS

10 CFR 51.22(c)(9) identifies certain licensing and regulatory actions, which are eligible for categorical exclusion from the requirement to perform an environmental assessment. A proposed amendment to an operating license for a facility does not require an environmental assessment if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant hazards consideration; (2) result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite; or (3) result in a significant increase in individual or cumulative occupational radiation exposure. PPL Susquehanna, LLC has evaluated the proposed changes and has determined that the proposed change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Accordingly, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with issuance of the amendment. The basis for this determination, using the above criteria, follows:

Basis

As demonstrated in the No Significant Hazards Consideration Evaluation, the proposed amendment does not involve a significant hazards consideration.

There is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite. The proposed change does not involve any physical alteration of the plant (no new or different type of equipment will be installed) or change in methods governing normal plant operation.

There is no significant increase in individual or cumulative occupational radiation exposure. The proposed changes do not involve any physical alteration of the plant (no new or different type of equipment will be installed) or change in methods governing normal plant operation.

7.0 REFERENCES

1. US NRC Administrative Letter 98-10, "Dispositioning of Technical Specifications that are Insufficient to Assure Plant Safety."

Attachment A to PLA-5850

Proposed Technical Specification Change

TS Table 3.3.5.1-1 (Mark-up)

(Unit 2)

Table 3.3.5.1-1 (page 3 of 5)
Emergency Core Cooling System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
3. High Pressure Coolant Injection (HPCI) System					
a. Reactor Vessel Water Level—Low Low, Level 2	1, 2(e), 3(e)	4	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ -45 inches
b. Drywell Pressure—High	1, 2(e), 3(e)	4	B	SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.5	≤ 1.88 psig
c. Reactor Vessel Water Level—High, Level 8	1 2(e), 3(e)	2	C	SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.5	≤ 55.5 inches
d. Condensate Storage Tank Level—Low	1, 2(e), 3(e)	2	D	SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.5	≥ 36.0 inches above tank bottom
e. Manual Initiation	1, 2(e), 3(e)	1	~~D~~ C	SR 3.3.5.1.5	NA

(continued)

(a) When the associated subsystem(s) are required to be OPERABLE.

(e) With reactor steam dome pressure > 150 psig.

Attachment B to PLA-5850

Proposed Technical Specification Bases Changes

(Mark-ups for Information Only)

TS Section 3.3.5.1 (Unit 2)

BASES

ACTIONS (continued)

C.1 and C.2

INTERIM ADMINISTRATIVE DIRECTION
Technical Specification Table 3.3.5.1-1, "HPCI System, Function 3.e, Conditions Referenced from Required Action A.1" contains a typographical error (CR 620823). The "D" referenced should be "C". In accordance with Administrative Letter 98-10, direction is provided until proposed TS change (LDCN 3798) is approved by the NRC.

Required Action C.1 is intended to ensure that appropriate actions are taken if multiple, inoperable channels within the same Function result in redundant automatic initiation capability being lost for the feature(s). Required Action C.1 features would be those that are initiated by Functions 1.d, 2.d, and 2.e (i.e., low pressure ECCS). Redundant automatic initiation capability is lost if either (a) two or more Function 1.d channels are inoperable such that the trip system loses initiation capability, (b) two or more Function 2.d channels are inoperable in the same trip system such that the trip system loses initiation capability, or (c) two or more Function 2.e channels are inoperable affecting LPCI pumps in different subsystems. In this situation (loss of redundant automatic initiation capability), the 24 hour allowance of Required Action C.2 is not appropriate and the feature(s) associated with the inoperable channels must be declared inoperable within 1 hour. Since each inoperable channel would have Required Action C.1 applied separately (refer to ACTIONS Note), each inoperable channel would only require the affected portion of the associated system to be declared inoperable. However, since channels for both low pressure ECCS subsystems are inoperable (e.g., both CS subsystems), and the Completion Times started concurrently for the channels in both subsystems, this results in the affected portions in both subsystems being concurrently declared inoperable. For Functions 1.d, 2.d, and 2.e, the affected portions are the associated low pressure ECCS pumps. As noted (Note 1), Required Action C.1 is only applicable in MODES 1, 2, and 3. In MODES 4 and 5, the specific initiation time of the ECCS is not assumed and the probability of a LOCA is lower. Thus, a total loss of automatic initiation capability for 24 hours (as allowed by Required Action C.2) is allowed during MODES 4 and 5.

Note 2 states that Required Action C.1 is only applicable for Functions 1.d, 2.d, and 2.e. Required Action C.1 is not applicable to Functions 1.e, 2.f, and 3.e (which also require entry into this Condition if a channel in these Functions is inoperable), since they are the Manual Initiation Functions and are not assumed in any accident or transient analysis. Thus, a total loss of manual initiation capability for 24 hours (as allowed by Required Action C.2) is allowed. Required Action C.1 is also not applicable to

(continued)

BASES

ACTIONS

C.1 and C.2 (continued)

Function 3.c (which also requires entry into this Condition if a channel in this Function is inoperable), since the loss of one channel results in a loss of the Function (two-out-of-two logic). This loss was considered during the development of Reference 3 and considered acceptable for the 24 hours allowed by Required Action C.2.

The Completion Time is intended to allow the operator time to evaluate and repair any discovered inoperabilities. This Completion Time also allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." For Required Action C.1, the Completion Time only begins upon discovery that the same feature in both subsystems (e.g., both CS subsystems) cannot be automatically initiated due to inoperable channels within the same Function as described in the paragraph above. The 1 hour Completion Time from discovery of loss of initiation capability is acceptable because it minimizes risk while allowing time for restoration of channels.

Because of the diversity of sensors available to provide initiation signals and the redundancy of the ECCS design, an allowable out of service time of 24 hours has been shown to be acceptable (Ref. 3) to permit restoration of any inoperable channel to OPERABLE status. If the inoperable channel cannot be restored to OPERABLE status within the allowable out of service time, Condition G must be entered and its Required Action taken. The Required Actions do not allow placing the channel in trip since this action would either cause the initiation or it would not necessarily result in a safe state for the channel in all events.

D.1, D.2.1, and D.2.2

INTERIM ADMINISTRATIVE DIRECTION

Technical Specification Table 3.3.5.1-1, "HPCI System, Function 3.e, Conditions Referenced from Required Action A.1" contains a typographical error (CR 620823). The "D" referenced should be "C". In accordance with Administrative Letter 98-10, direction is provided until proposed TS change (LDCN 3798) is approved by the NRC.

Required Action D.1 is intended to ensure that appropriate actions are taken if multiple, inoperable, untripped channels within the same Function result in a complete loss of automatic component initiation capability for the HPCI System. Automatic component initiation capability is lost if two Function 3.d channels are inoperable and untripped. In this situation (loss of automatic suction swap), the 24 hour allowance of Required Actions D.2.1 and D.2.2 is not appropriate and the HPCI

(continued)