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 CURTIS, N.W. Pennsylvania Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 SCHWENCER, A. Licensing Branch 2

SUBJECT: Requests exemption from 10CFR70.24 for criticality monitors until fuel is placed in new fuel storage vault. Presently, all fuel is stored in spent fuel pool.

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Pennsylvania Power & Light Company

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Norman W. Curtis
Vice President-Engineering & Construction-Nuclear
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July 6, 1982

Mr. A. Schwencer, Chief
Licensing Branch No. 2
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION
CRITICALITY MONITORS
ER100450 FILE 841-2 PLA-1169

Docket Nos. 50-387
50-388

Dear Mr. Schwencer:

In a letter dated April 13, 1982 (PLA-1062), PP&L requested an indefinite exemption from 10CFR70.24 for criticality monitors. This request was withdrawn on July 2, 1982 (PLA-1165) based on new information. The purpose of this letter is to request an exemption from 10CFR70.24 for a limited time period. We feel that this request meets the intent of protecting public safety when a real need exists.

Currently, no fuel is being stored in a dry condition at Susquehanna. All new fuel is being stored in the spent fuel pool. This fuel is stored in underwater racks which geometrically limit K_{eff} to less than or equal to 0.95 (for reference see SSES SER Section 9.1). Inadvertent criticality of this fuel is highly unlikely.

Therefore, PP&L requests an exemption from 10CFR70.24 for criticality monitors until fuel is placed in the new fuel storage vault. The criticality monitors will be in place by this time and we will comply with the requirements of 10CFR70.24.

Very truly yours,

N.W. Curtis
Vice President - Engineering & Construction - Nuclear

DPM

cc: R.L. Perch

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A. PDR



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