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

SUBJECT: Advises that License Condition 28B re special low power testing & training satisfied by util 820615 submittal.Loss of ac power test endangers plant equipment & does not achieve NRC test objectives.Alternate testing proposed.

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TITLE: Licensing Submittal: PSAR/FSAR Amdts & Related Correspondence

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PP&L Pennsylvania Power & Light Company
Two North Ninth Street • Allentown, PA 18101 • 215 / 770-5151

Norman W. Curtis
Vice President-Engineering & Construction-Nuclear
215 / 770-5381

AUG 25 1982

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

SUSQUEHANNA STEAM ELECTRIC STATION
RESPONSE TO LICENSE CONDITION 28B
ER 100450 FILE 841-2
PLA-1248 Docket No. 50-387

Dear Mr. Schwencer:

Condition 28B of the Susquehanna operating license is as follows:

> Special Low Power Testing and Training (I.G.1, SER, SSER #3)
>
> During the first cycle, PP&L shall perform Simulated Loss of All AC Power Test. At least four weeks prior to the test, PP&L shall provide a safety analysis and test procedure to NRC.

We believe the required submittal was completed with our letter of June 15, 1982 (PLA-1136). Supplement 3 to the Susquehanna SER recognized this submittal but stated that the report did not include a safety analysis from which the staff could determine if the test would result in operation outside the boundary conditions of the safety analysis in FSAR Chapter 15. Our report included a description of the expected response of the plant to the test originally proposed and also provided extensive information on the response of the plant to an actual loss of all AC power event. This report stated our assessment of the limits for safe conditions of operation of the plant both for the test and for an actual event. Our findings were that the plant could be maintained within Chapter 15 limits for a period of several hours for the test and for an actual event. We did find that

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consideration of potential damage to non-safety related equipment and use of qualification life of some safety related equipment significantly limits the degree to which a test could simulate an actual loss of all AC power event.

Based on this information, we feel we have completed all actions required at this time. The findings of our evaluation show that the performance of a loss of AC power test endangers plant equipment and does not achieve the NRC test objectives. We have proposed alternative testing in our June 15 letter and are awaiting your approval.

Very truly yours,

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

DPM/dmm