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SUBJECT: Application to amend License NPF-14, revising Tech Specs re diesel air start sys initial start times.

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Bruce D. Kenyon
Vice President-Nuclear Operations

September 24, 1982

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

SUSQUEHANNA STEAM ELECTRIC STATION
PROPOSED AMENDMENT 7 TO LICENSE NPF-14
ER 100450 FILE 841-8
PLA-1315

Docket No. 50-387

Dear Mr. Schwencer:

The purpose of this letter is to request a change to Appendix A of License NPF-14, the Susquehanna SES Unit 1 Technical Specifications.

Prior to the issuance of the operating license, Pennsylvania Power & Light (PP&L) requested, by letter (PLA-1177, July 9, 1982) a change to Technical Specification 4.8.1.1.2.d.12, which is one requirement for 18 month diesel surveillance.

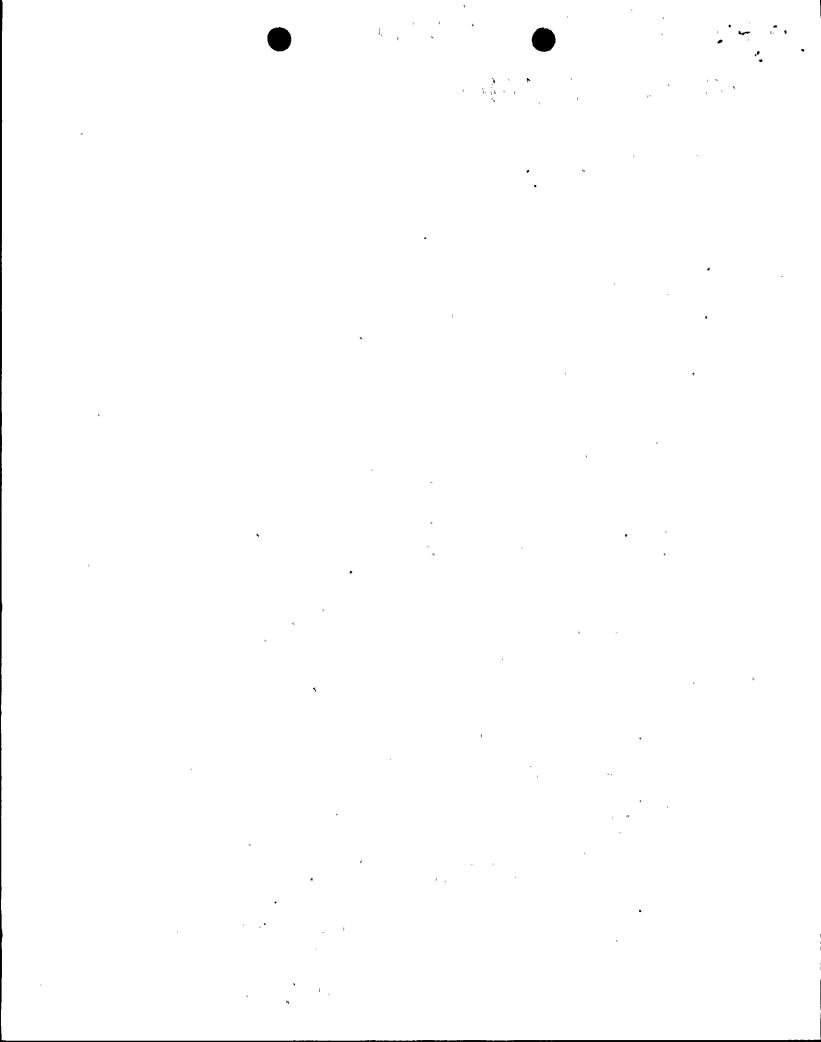
That request resulted in the deferral of the requirement until Susquehanna exceeded 5% of rated thermal power, so that the staff could study the situation further. As SSES approaches the prescribed deadline for performing the surveillance, PP&L would like to reestablish the previous proposal in the form of a request for a license amendment.

In order to justify this request, the following information from the July 9 letter should be restated:

- 1. "The as-built installation of the diesel generator starting system meets the design bases delineated in FSAR section 9.5.6.1 and conforms with the Standard Review Plan requirements."
- 2. "The diesel air start system has 2 compressors, 2 receivers and interconnecting piping to assure starting reliability. The air start systems are sized for 5 start capability with the compressors secured. Testing to prove this capability has been performed. The results prove the air start systems have sufficient volume to start the engines 5 times."
- 3. "Only one diesel loading sequence interval, initiated from either LOCA or LOOP auto-start signals, is considered in the safety analysis. Therefore, the 10 second testing requirement for

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subsequent starts does not provide any verification of additional safety margin for Susquehanna Steam Electric Station."

The design of the air start system is such that if the initial start does not occur within 10 seconds, the system continues cranking until either a start is achieved or the air runs out. Therefore, there is no time relation associated with the four subsequent starts; they simply serve to verify that more than enough capacity exists in the system to support the initial start.

Finally, PP&L believes that the reliability of the initial 10 second start was proven in the 300 start and load test performed in order to satisfy IEEE Standard 387-1977 (ref. PLA-958, 1-18-82).

Therefore, since the diesel air start system has shown ample capacity and reliability to support the initial start in 10 seconds, a time limit of 25 seconds is being proposed for the four subsequent starts. PP&L believes that this value provides the margin necessary to achieve repeatability of the test data already provided to the staff (PLA-1264, September 2, 1982), while having no adverse effect on the safe operation of Susquehanna SES.

The proposed change is provided as Attachment 1 to this letter; it has been determined to be Class III and the proper fee is enclosed.

Very truly yours,

B. D. Kenyon

Vice President-Nuclear Operations

Attachment RRS:mcb

cc: Mr. R. L. Perch - US NRC

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## BEFORE THE UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of

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PENNSYLVANIA POWER & LIGHT COMPANY

Docket No. 50-387

## AMENDMENT NO. 7

FACILITY OPERATING LICENSE NO. NPF-14

SUSQUEHANNA STEAM ELECTRIC STATION UNIT NO. 1

Licensee, Pennsylvania Power & Light Company, hereby files Amendment No. 7 to its Facility Operating License No. NPF-14 dated July 17, 1982.

This amendment contains a revision to Appendix A, the Technical Specifications.

PENNSYLVANIA POWER & LIGHT COMPANY BY:

B. D. Kenton

Vice President - Nuclear Operations

Sworn to and subscribed before me this of the first that the subscribed before me

Notary Public

MARTHA C. BARTO, Notary Public Allentown, Lehigh County, Pa.

My Commission Expires Jan. 13, 1986

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