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 RECIP. NAME      RECIPIENT AFFILIATION  
 SCHWENCER, A.      Licensing Branch 2

SUBJECT: Informs of nonconformance w/clarification 5 of Nureg-0737, Item II.E.4.2, "Containment Isolation Dependability." Mod required in FSAR included gang-opening several valves in two sys. Explanation of clarification 5 requested.

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Vice President-Engineering & Construction-Nuclear  
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50-387  
50-388

NOV 10 1982

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

SUSQUEHANNA STEAM ELECTRIC STATION  
NONCONFORMANCE WITH NUREG-0737, ITEM II.E.4.2  
ER 100450 FILE 841-2  
PLA-1384

Dear Mr. Schwencer:

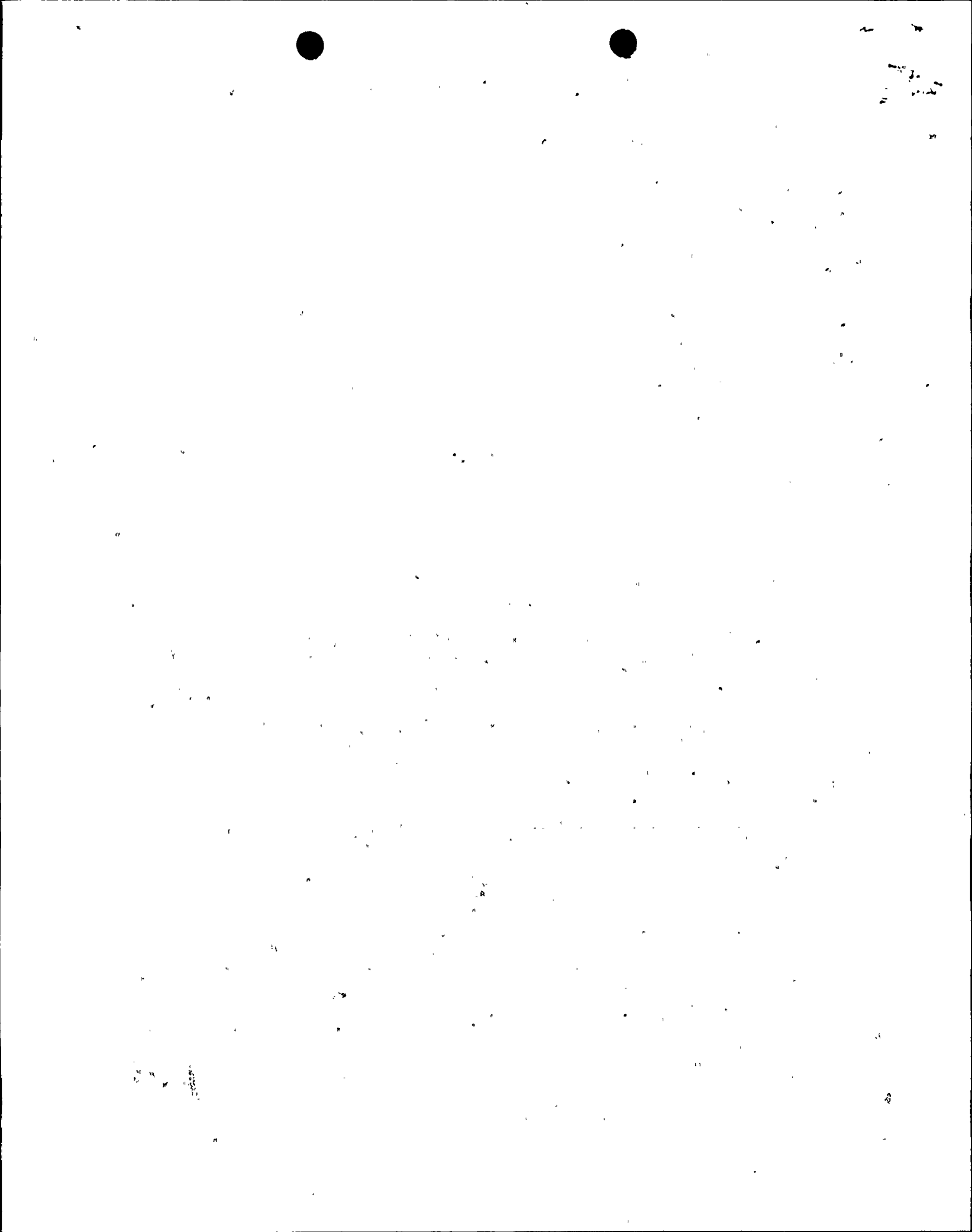
PP&L has recently discovered a nonconformance with NUREG-0737, item II.E.4.2. Our response to part 4 of item II.E.4.2 which is contained in Subsection 18.1.29.3 of the FSAR states that logic modifications were necessary to comply with the requirement. These modifications were completed to require deliberate manual action to reopen all valves that would have automatically reopened on logic reset. However the modification included gang-opening several valves in two systems. This is not in compliance with Clarification 5 of item II.E.4.2.

PP&L has completed a review of this design and has determined that it is not an unreviewed safety question based on the fact that all valves involved are in non-essential systems which automatically isolate and have no post-accident functions and can remain closed once containment is isolated. In addition, PP&L has existing operating procedures which prevent containment isolation reset until containment radiation levels have been verified to be less than 1R/hr and the cause of the isolation has been identified and corrected. These procedures also require the manual closing of valve switches in one of the two systems prior to resetting containment isolation logic and performing actions that would result in the opening of the valves. This would result in the ganged reopening of valves in only one system, despite the actual logic in the design.

PP&L will modify the valve logic to comply with Clarification 5 of item II.E.4.2. However we believe the existing design and procedures meet the intent of part 4 of the requirement. In addition, PP&L will alert its reactor operators to the consequences of containment isolation reset and valve reopening, and using

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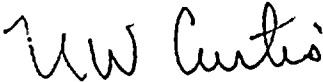
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SSES PLA-1384  
ER 100450 File 841-2  
Mr. A. Schwencer

caution tags on appropriate controls to assure safe operation. PP&L believes this is an adequate interim disposition until modifications can be developed and implemented. A schedule for implementation will be forwarded as soon as estimates are developed.

In addition, we request you to provide an interpretation of Clarification 5 of item II.E.4.2 on the acceptability of manually gang-opening valves within a system.

Very truly yours,



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

DPM/mks

cc: R. L. Perch - NRC  
G. Rhoads - NRC



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