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 FACIL: 50-387 Susquehanna Steam Electric Station, Unit 1, Pennsylvania 05000387
 AUTH. NAME AUTHOR AFFILIATION
 CURTIS, N.W. Pennsylvania Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 SCHWENCER, A. Licensing Branch 2

SUBJECT: Provides addl clarification on relief request for transformer replacement. Extension of ACTION time from does not involve significant increase in probability or consequences of previously evaluated accident.

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NOTES: 1cy NMSS/FCAF/PM.

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STATE OF TEXAS
COUNTY OF DALLAS
I, the undersigned, Clerk of the County of Dallas, State of Texas, do hereby certify that the following is a true and correct copy of the original as the same appears in the records of the County of Dallas, State of Texas, to-wit:

That the following is a true and correct copy of the original as the same appears in the records of the County of Dallas, State of Texas, to-wit:

That the following is a true and correct copy of the original as the same appears in the records of the County of Dallas, State of Texas, to-wit:

Witness my hand and seal of office this 1st day of January, 1941.

CLERK OF COUNTY

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Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101 • 215 / 770-5151

Norman W. Curtis
Vice President-Engineering & Construction-Nuclear
215/770-7501

August 4, 1983

Director of Nuclear Reactor Regulation
Attention: Mr. A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION
ADDITIONAL CLARIFICATION ON THE RELIEF REQUEST
FOR TRANSFORMER REPLACEMENT
ER 100450 FILE 841-8
PLA-1768

Docket No. 50-387

Dear Mr. Schwencer:

As requested by your staff, the following information is provided as additional clarification of our request for relief from Technical Specifications to support the transformer replacement.

No Significant Hazards Consideration

A. Extension of the ACTION time in Technical Specification 3.8.1.1.a from 72 hours to 7 days.

1. This change does not involve a significant increase in the probability or consequences of an accident previously evaluated. If the remaining offsite power circuit was lost, vital loads would be picked up by the emergency diesel generators. No credit is taken in the LOCA analysis for offsite power.
2. This change does not create the possibility of a new or different kind of accident from any accident previously evaluated since no credit is taken in the LOCA analysis for offsite power.
3. This change does not involve a significant reduction in a margin of safety since prior to taking one offsite power source out of service, the breaker alignment for the other offsite source and the operability of the diesel generators will be verified.

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AUG 04 1983

B. Elimination of the 1 hour breaker alignment surveillance in Technical Specification 3.8.1.1 ACTION a:

1. This change does not involve a significant increase in the probability or consequences of an accident previously evaluated since no credit is taken for the offsite power sources in the LOCA analysis.
2. This change does not create the possibility of a new or different kind of accident from any accident previously evaluated since no credit is taken for the offsite power sources in the LOCA analysis.
3. This change does not involve a significant reduction in a margin of safety since the breaker alignment will be checked prior to taking the one offsite power source out of service. By checking the alignment prior to entering the LCO we have better assurance that the remaining offsite power source will function as required.

C. Elimination of the 4 hour diesel generator start testing as required by Technical Specification 3.8.1.1 ACTION a:

This change does not involve a significant increase in the probability or consequences of an accident previously evaluated, nor does it create the possibility of a new or different kind of accident from any accident previously evaluated, nor does it involve a significant reduction in a margin of safety. The testing will be performed prior to taking one offsite power source out of service thus assuring that the diesel generators will function if needed when the offsite power source is taken out of service.

D. Extension of the 8 hour diesel generator surveillance to 72 hours as required by Technical Specification 3.8.1.1, ACTION a:

This change does not involve a significant increase in the probability or consequences of an accident previously evaluated, nor does it create the possibility of a new or different kind of accident from any accident previously evaluated, nor does it involve a significant reduction in a margin of safety. As stated in our previous letter (PLA-1764) there does not appear to be any significant evidence that starting the diesel generators on the required 8-hour basis will increase their starting reliability; in fact, reliability could be reduced due to the excessive demands being placed on the diesel generators. Relief from this 8-hour testing requirement was given to the Farley Station in 1981 as referenced on pages 218 and 219 of the Transcript of the ACRS Subcommittee on AC/DC Power Systems Reliability, September 8, 1982 meeting. A copy of these pages is attached.

If you have any additional questions or concerns, please contact me.



AUG 04 1983

Very truly yours,



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

Attachment

cc: R. L. Perch - NRC
T. M. Gerusky - PA BRP

1 I might point out that during this event there
2 was a loss of instrumentation in the control room and,
3 like some other events, the operators did not know which
4 events to believe or which not to believe, and they had
5 to send people outside the control room, outside the
6 archways, to find out where the control level was.

7 San Onofre was a very simple event.
8 Instrument line measuring loophole pressure burst,
9 sprayed lube oil down on hot pipes and, of course, it
10 caught fire. It only involved one diesel. No
11 interaction.

12 (Slide.)

13 Okay. Moving right on, emergency tech spec
14 changes. What I would like to do here is just run
15 through these things as quickly as I can and just hit
16 some of the highlights. You will see on the first page
17 there are three Farleys. The major points here are that
18 the first one involved Diesel 1C, as it is called at the
19 plant, which is a Fairbanks-Morse or Colt unit at the
20 2850 Kw size. This particular unit, it is a shared
21 unit. It will provide power at either unit to what is
22 called Division A.

23 The problem is they found water in the
24 cylinders and they thought it was an O-ring problem.
25 The important point here is it took 13 days, they

1 estimated, to fix it. They had a three-day or 24-hour
2 CO. They asked for an extension on the plant.

3 In addition, when this was done, the NRC
4 suggested that while we are giving you something like 13
5 days, we do not really think it is a good idea to be
6 test-starting every diesel at this station for this
7 period of time. So we changed the action statement
8 testing requirement for a this-time-only basis, that
9 they would check every 72 hours instead of every 8
10 hours.

11 There was another event. The same sort of
12 thing happened with the same diesel. This time what
13 they found out was that when they went into it real good
14 the risk pins were gone. That was causing the O-rings
15 to go. They needed ten days to fix it. They needed a
16 15-day extension. We granted it.

17 Farley Station involved another diesel, but it
18 was the same manufacturer and the same cause. This time
19 they found water in the heads and they had a little side
20 damage.

21 (Slide.)

22 I would point out that at the top of the next
23 page, the last item is crucial under the first event.
24 The NRC requested, after this three times in one summer
25 situation at Farley that even though the plant safety



Handwritten marks and a horizontal line in the top right corner.