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

SUBJECT: Forwards application to amend License NPF-14,consisting of Proposed Amend 26,revising License Condition 2.C.(18)(e) to extend deadline for qualification of equipment for scram discharge vol break environ.

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PP&L Pennsylvania Power & Light Company
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Norman W. Curtis
Vice President-Engineering & Construction-Nuclear
215/770-7501

AUG 22 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
PROPOSED AMENDMENT 26 TO LICENSE NPF-14
ER 100450 FILE 841-2
PLA-1721 Docket No. 50-387

Dear Mr. Schwencer:

The purpose of this letter is to propose a change to License Condition 2.C.(18)(e) of License No. NPF-14. This condition required PP&L to implement the required equipment qualifications for equipment pursuant to Section 5.3 of NUREG-0803 for an SDV break environment prior to startup following the first refueling outage.

PP&L is a member of the BWR Owner's Group. This group has submitted to the NRC a report, NEDO-22209, which is titled "Analysis of Scram Discharge Volume, System Piping Integrity." PP&L believes that this report demonstrates that the probability of the scram discharge pipe break is sufficiently low to conclude that the frequency of core damage resulting therefrom is a negligible contributor to risk and, therefore, qualification of equipment for scram discharge pipe breaks is not necessary. The staff has indicated a reluctance to resolve this issue on the basis of the above referenced report alone. As a result, we are participating with other Owner's Group members in further study of this issue. A realistic fracture mechanics analysis is planned to determine credible break sizes, if any.

Because of the ongoing work and the staff's indicated receptiveness to this effort, we believe it to be unwise to expend critical manpower and financial resources to qualify additional equipment at this time. Consequently, we are proposing that the deadline for qualification of this equipment be changed to two years or the end of the first refueling outage following the date an NRC position on the qualification of this equipment is finalized, whichever is later.

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Pursuant to 10CFR50.91(a)(1), PP&L has determined that the proposed amendment involves no significant hazards considerations. An analysis in accordance with 10CFR50.92 is attached.

Pursuant to 10CFR50.91(b)(1), copies of this application and the significant hazards consideration analysis have been provided to the Commonwealth of Pennsylvania.

We have determined this change to be Class III in nature and have enclosed the appropriate fee pursuant to 10CFR170.

Very truly yours,

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

Attachments
Affidavit
No Significant Hazards Consideration

cc: Mr. Thomas Gerusky, Director
Bureau of Radiation Protection
Pennsylvania Department of Environmental Resources
P. O. Box 2063
Harrisburg, PA 17120

Mr. R. L. Perch - USNRC

NO SIGNIFICANT HAZARDS CONSIDERATION

Delaying the qualification of equipment pursuant to Section 5.3 of NUREG-0803 for an SDV break environment to two years or the end of the first refueling outage following the date the NRC's position on qualification of equipment necessary to mitigate the consequences of an SDV break is determined, whichever is later, will not:

1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or

2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or

3) Involve a significant reduction in a margin of safety.

This position is based on:

1) The low probability of occurrence of the subject break, particularly during the time frame proposed; and

2) Use of condensate to provide reactor water level maintenance.