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

SUBJECT: Responds to NRC request for rev to significant hazards evaluation for proposed Amend 26 to License NPF-14. Delayed qualification of equipment necessary to mitigate consequences of scram discharge vol break.

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Pennsylvania Power & Light Company

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

NRR LLB2

SEP 15 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 INFORMATION REGARDING PROPOSED  
AMENDMENT 26 to LICENSE NPF-14  
ER 100450 FILE 841-2  
PLA-1833

Docket No. 50-387

Dear Mr. Schwencer:

This letter is provided in response to a request for revision to our significant hazards evaluation for proposed Amendment 26 to License NPF-14.

It is PP&L's position that 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. This position is based on the results of the BWR Owner's Group report NEDO 22209 which demonstrates that the probability of this type of accident occurring is extremely low. Extending the time to achieve qualification does not significantly increase the probability of this type of accident occurring. Additionally, there is no increase in the consequences of the SDV break accident due to the extending the time for qualification as reactor water level maintenance will be accomplished through the use of the condensate system; or
- 2) Create the possibility of a new or different kind of accident from the type previously evaluated since only time extension is involved, not the changing of hardware or operational methodology; or
- 3) Result in a significant reduction in the margin of safety since, during the time period involved, it is anticipated that no equipment changes will be made that will reduce the margin of safety.

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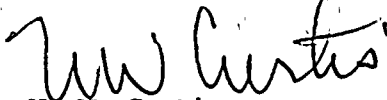
SEP 15 1983

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SSES PLA-1833  
ER 100450 File 841-2  
Mr. A. Schwencer

It should also be noted that Susquehanna SES is the only BWR which has this requirement. The other NIOI-BWR's have been allowed to follow the BWR Owners' Group recommendations until this issue is resolved with the NRC.

Very truly yours,



N. W. Curtis

Vice President-Engineering & Construction-Nuclear

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

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