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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: Application for Amend 29 to License NPF-14, revising
 inservice visual insp of snubbers.

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

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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 NO. 29 TO LICENSE NO. NPF-14
ER 100450 FILE 841-8
PLA-1880

Docket No. 50-387

Dear Mr. Schwencer:

The purpose of this letter is to propose a change to the Susquehanna SES Unit 1 Technical Specifications.

Presently, Technical Specification 4.7.4.a requires that "If less than two snubbers are found inoperable during the first inservice visual inspection, the second inservice visual inspection shall be performed 12 months +25% from the date of the first inspection." Zero failures were found during the first inspection at Susquehanna; therefore (based on the finish date of the inspection), we must perform the second inspection between February and August of 1984. Such an inspection will require a 10 to 14 day outage, and none is scheduled for that time frame.

Based on the justification provided below to support the belief that no stricter requirement is necessary for the second inspection than is imposed on subsequent inspections, we propose that the sentence quoted above be revised to read as follows:

If all snubbers of each type are found OPERABLE during the first inservice visual inspection, the second inservice visual inspection shall be performed at the first refueling outage.

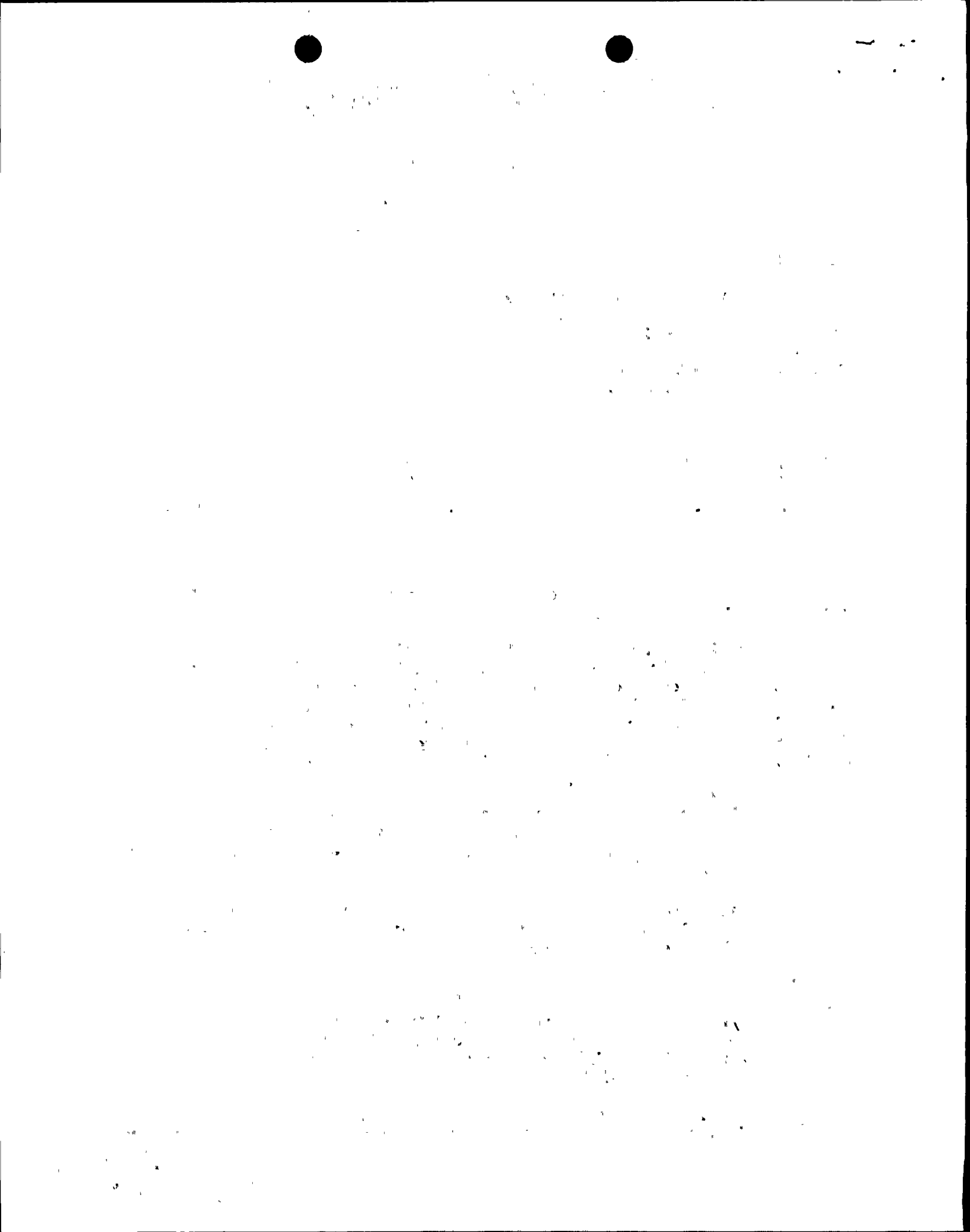
JUSTIFICATION

There is currently no basis in the Technical Specifications to support the special requirements for the second inspection. Given this fact, we have tried to evaluate all possible concerns related to the change proposed; a synopsis of each is provided below.

- A. STARTUP TESTING: The snubbers have experienced, by the time of the second inspection, considerable abnormal duty related to the construction period

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OCT 11 1983

Page 2

SSES PLA-1880
ER 100450 File 841-8
Mr. A. Schwencer

and the exposure to known transients during the Startup Test Program. An inspection at a reduced interval is therefore necessary.

RESPONSE

This is not a concern in the case of Susquehanna. The first inspection did not begin until after the Startup Test Program was completed. Since normal plant operation is anticipated between the first and second inspections, the second inspection should be on a frequency commensurate with subsequent inspections.

- B. OPERATIONAL HISTORY: There is a lack of operating data to support a positive reliability assumption, i.e. going from 12 +25% to first refueling outage; aren't "new" snubbers likely to give good data the first time?

RESPONSE: True, the snubbers are "infants" with respect to operating history. However, most experienced a long period during Unit 1 Construction during which they were exposed to many potential failure mechanisms. They were also exposed to more rigorous operation (i.e. transients) than they would expect to see over an 18 month period of normal operation. Therefore, the first visual inspection was instrumental in showing reliability. It should be noted that SSES has experienced several unexpected transients in the first months of commercial operation. However, concern for snubber impacts from these transients is allayed by the fact that systems affected by any potentially damaging transient are walked down to ensure via visual inspection that no snubbers are inoperable, as soon as possible after the transient occurs.

- C. EXTENDED CYCLES: The proposed change allows the second inservice visual inspection to be changed from 12 months +25% (from the first) to "the first refueling outage." Potentially, the first cycle could go beyond 18 months +25%, yet be within the Tech Spec requirements. How is this justified on the basis of the seemingly obvious reduction in reliability?

RESPONSE: In all likelihood, based on the present schedule, the first refueling outage will be 17 months from the initial inspection. Extending this figure 5½ months (i.e. 17 to 18 +25%) is, in itself, an integral part of establishing the probability function associated with having to address this concern. Putting that aside, should SSES Unit 1 go beyond the 18 months +25%? There are several factors to consider. First, SSES Unit 1 has shown perfect operational history (i.e. zero failures at the first inspection) to date (True, zero is consistent with 18 months +25% on the current reliability scale, however, no failures still adds a measure of confidence). Second, a group of industry experts (the ASME Code Committee) has established much more liberal surveillance requirements (ASME Section XI) which they feel are adequate for safe operation without any augmented program. Finally, it is SSES standard practice to walk down any impacted piping system associated with an experienced damaging transient. Since this is not required via the Technical Specifications,

OCT 11 1983

Page 3

SSES PLA-1880
ER 100450 File 841-8
Mr. A. Schwencer

it adds a significant amount of reliability to a "formula" that presently doesn't consider its existence. This added surveillance makes any frequency lengthened by only 2 or 3 months due to an extended fuel cycle negligible with respect to degrading reliability.

- D. ALARA: Are there any ALARA concerns associated with changing test frequency, since a maintenance activity is the issue?

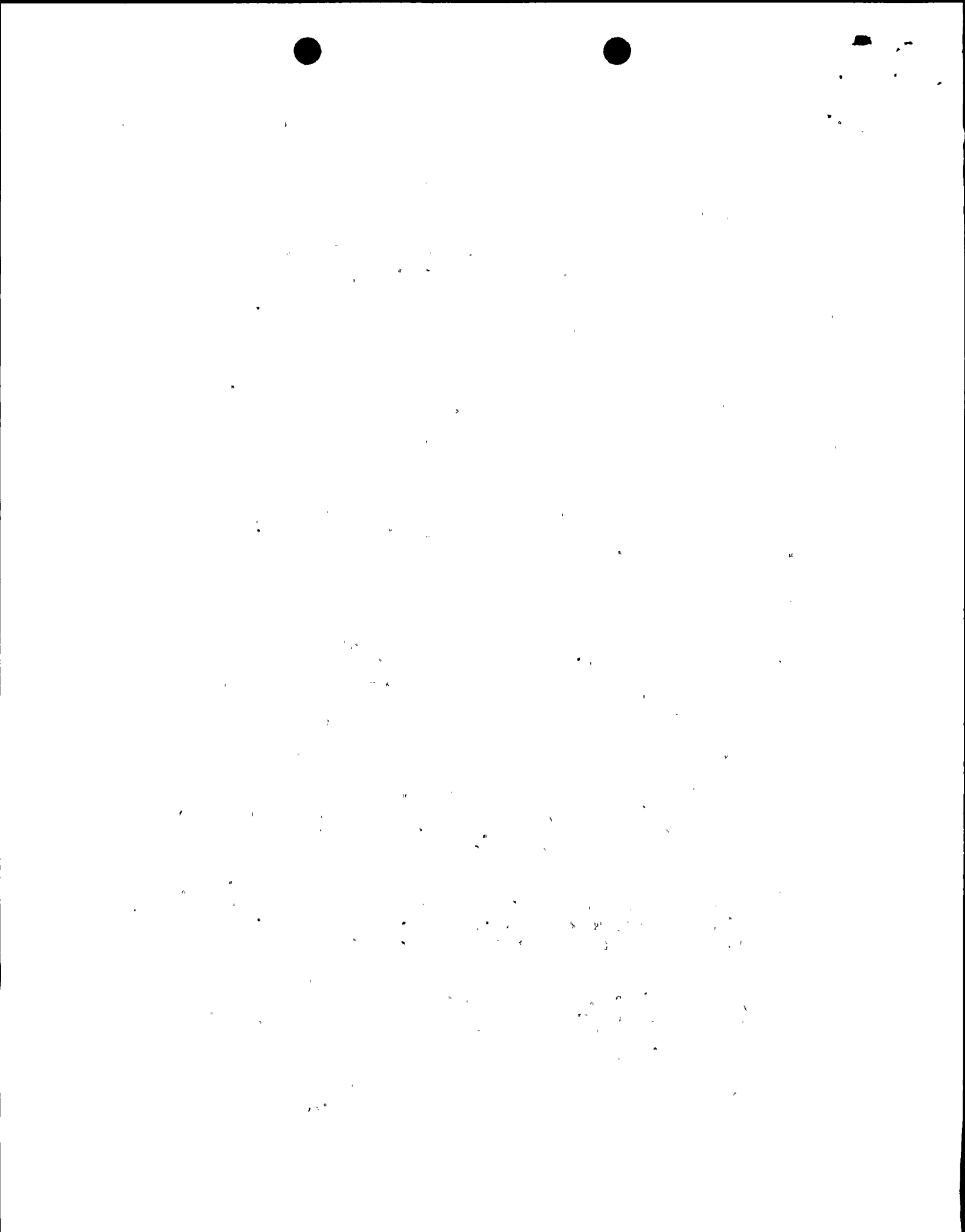
RESPONSE: No. The plant will be in a refueling outage when the inspections are performed. Any ALARA concerns will be addressed by the existing Radiation Work Permit system.

- E. RELATED TECHNICAL SPECIFICATIONS: Are any other Tech Specs related to these snubber surveillances in such a way that the spirit of what they required has been altered?

RESPONSE: The Tech Specs were reviewed for any such items. Based on the fact that the issue concerns visual examinations, other existing Tech Specs are not changed by the proposed change.

NO SIGNIFICANT HAZARDS DETERMINATION

- I. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated. If the change constituted a significant reduction in snubber reliability, then it is obvious that the capability of the related safety systems to respond in a seismic event would be in question. It has been shown above that this is not the case, for the following reasons:
1. The Startup Test Program was completed prior to the beginning of the first inservice visual inspection. Therefore the first inspection evaluated the snubbers for this period of abnormal operation, and the second inspection, like subsequent ones, will look at a period of expected normal operation. It can therefore be done on the same frequency as the subsequent inspections.
 2. The first inspection was instrumental in showing reliability. Even though the snubbers went through construction and startup testing, a failure rate of zero was achieved. Such experience is much more rigorous than expected during normal operation.
 3. If a damaging transient occurs during a period of expected normal operation, it is standard practice at Susquehanna to walk down any impacted piping system associated with the transient. This adds a factor of reliability currently not required by the Technical Specifications.
- II. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated. Based on the reliability arguments in I above, no new concerns are



OCT 11 1983

Page 4


SSES PLA-1880
ER 100450 File 841-8
Mr. A. Schwencer

created, because no reduction in reliability exists. There are no hardware or other design changes associated with the proposed change.

III. The proposed change does not involve a significant reduction in a margin of safety. Again, I above shows that safety systems are not threatened by any decrease in reliability. There are no ALARA concerns, in that the inspection in question will be performed in an outage. Also, related Technical Specifications have been reviewed to ensure that this change will not affect their associated margins of safety as defined in the Technical Specification bases; no problems were discovered.

Pursuant to 10CFR170.22, we have determined the proposed change to be Class III in nature and have enclosed the appropriate fees.

Very truly yours,

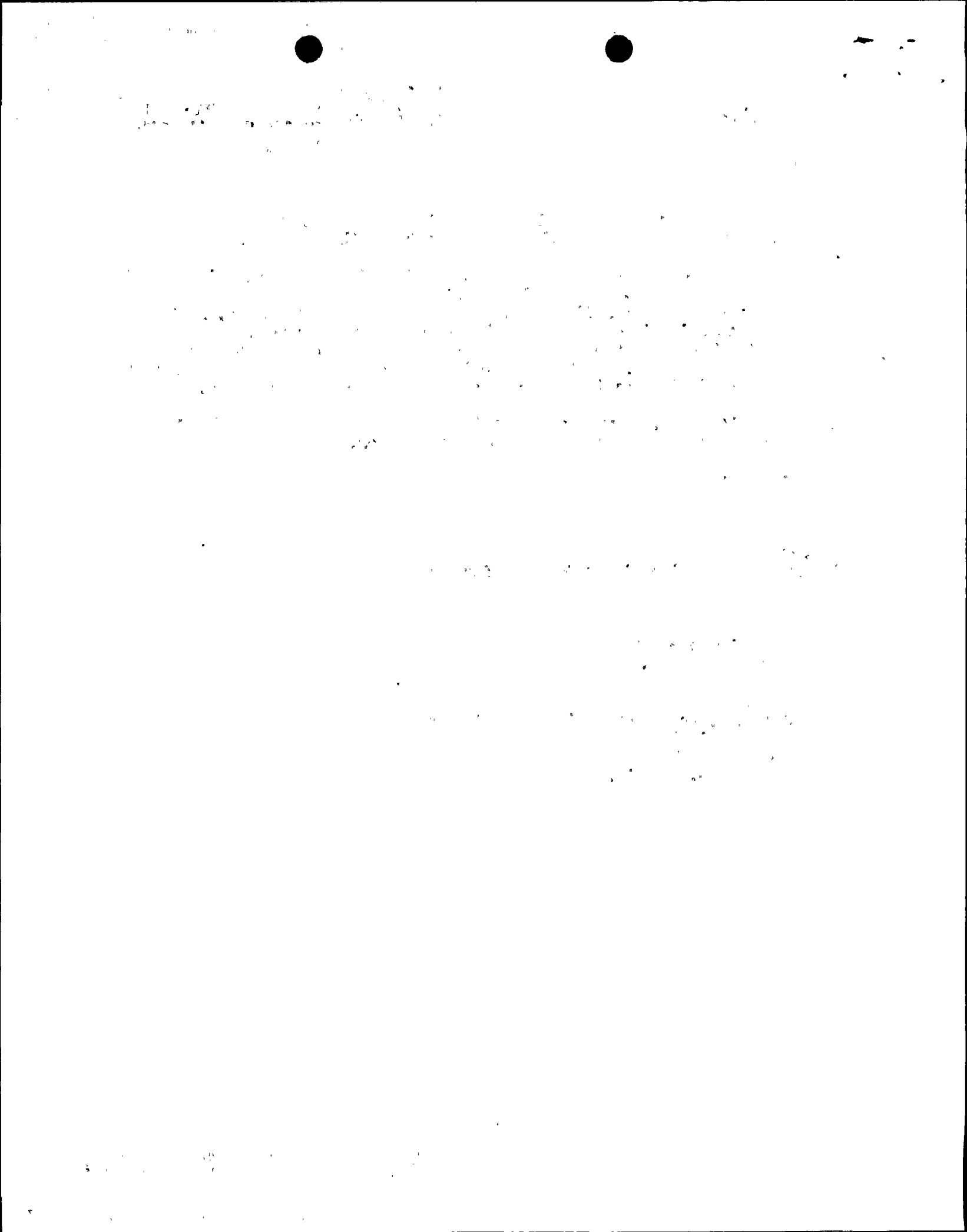


N. W. Curtis
Vice President-Engineering & Construction-Nuclear

Enclosure

cc: R. L. Perch - USNRC
D. Hoffman - USNRC

T. M. Gerusky
Director, Bureau of Radiation Protection
Fulton Building
P.O. Box 2063
Harrisburg, PA 17120



PLANT SYSTEMS

3/4.7.4 SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.4 All snubbers listed in Table 3.7.4-1 shall be OPERABLE.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2 and 3 and OPERATIONAL CONDITIONS 4 and 5 for snubbers located on systems required OPERABLE in those OPERATIONAL CONDITIONS.

ACTION:

With one or more snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.4.c on the supported component or declare the supported system inoperable and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

4.7.4 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program and the requirements of Specification 4.0.5.

a. Visual Inspections *If all snubbers of each type are found OPERABLE*

The first inservice visual inspection of snubbers shall be performed after 4 months but within 10 months of commencing POWER OPERATION and shall include all snubbers listed in Table 3.7.4-1. ~~If less than two snubbers are found inoperable during the first inservice visual inspection, the second inservice visual inspection shall be performed 12 months ± 25% from the date of the first inspection.~~ Otherwise, subsequent visual inspections shall be performed in accordance with the following schedule:

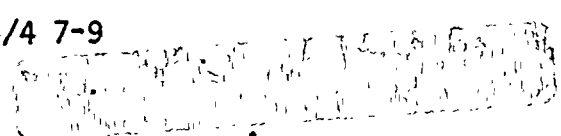
at the first refueling outage

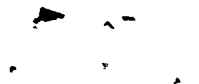
<u>No. Inoperable Snubbers per Inspection Period</u>	<u>Subsequent Visual Inspection Period*#</u>
0	18 months ± 25%
1	12 months ± 25%
2	6 months ± 25%
3,4	124 days ± 25%
5,6,7	62 days ± 25%
8 or more	31 days ± 25%

The snubbers may be categorized into two groups: Those accessible and those inaccessible during reactor operation. Each group may be inspected independently in accordance with the above schedule.

*The inspection interval shall not be lengthened more than one step at a time.

#The provisions of Specification 4.0.2 are not applicable.





BEFORE THE
UNITED STATES NUCLEAR REGULATORY COMMISSION

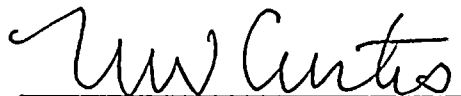
In the Matter of :
PENNSYLVANIA POWER & : Docket No. 50-387
& LIGHT COMPANY :

PROPOSED AMENDMENT NO. 29
FACILITY OPERATING LICENSE NO. NPF-14
SUSQUEHANNA STEAM ELECTRIC STATION
UNIT NO. 1

Licensee, Pennsylvania Power & Light Company, hereby files proposed Amendment No. 29 to its Facility Operating License No. NPF-14 dated July 17, 1982.

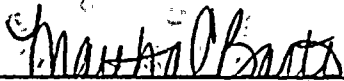
This amendment contains a revision to the Susquehanna SES Unit 1 Technical Specifications.

PENNSYLVANIA POWER & LIGHT COMPANY
BY:



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

Sworn to and subscribed before me
this 10th of October, 1983.



Notary Public
MARTHA C. BARTO, Notary Public
Allentown, Lehigh County, Pa.
My Commission Expires Jan. 13, 1986

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