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

SUBJECT: Application for amend to License NPF-14 proposing changes to Tech Spec Tables 3.3.2-1 & 3.6.3-1 reinstating Isolation Signal X on Trip Function 1.b & deleting two valves from automatic isolation valve list. Class III amend fee encl.

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NOTES: 1cy NMSS/FCAF/PM. LPDR 2cys.

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EXTERNAL:	ACRS 41	6 6	BNL (AMDTS ONLY)	1 1
	DMB/DSS (AMDTS)	1 1	FEMA-REP DIV 39	1 1
	LPDR 03	2 2	NRC PDR 02	1 1
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THE SECRETARY OF THE ARMY  
 WASHINGTON, D. C.  
 APRIL 10, 1918

TO THE SECRETARY OF THE ARMY  
 FROM THE SECRETARY OF THE ARMY

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Pennsylvania Power & Light Company

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

NOV 04 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 34 TO LICENSE NPF-14  
ER 100450 FILE 841-8  
PLA-1938

Docket No. 50-387

Dear Mr. Schwencer:

The purpose of this letter is to propose changes to Tables 3.3.2-1 and 3.6.3-1 of the Susquehanna SES Unit 1 Technical Specifications.

The proposed change to Table 3.3.2-1 is purely administrative in nature. Our review indicates that the isolation signal "X" on Trip Function 1.b. was approved by the NRC in Amendment 4 to License NPF-14; it was inadvertently dropped from the table upon issuance of Amendment 6. We propose that the "X" be reinstated as shown on Attachment A.

In Table 3.6.3-1, we have determined that two valves, HV-151F122A and B, are listed as Automatic Isolation Valves when in fact they are manually-operated valves which have no need for automatic isolation. We therefore propose that these valves be deleted from the Automatic Isolation section of the table and added to the Manual Isolation section (see Attachment B, pp 1 and 2.) We also propose a change to clarify their functional description, which is discussed in greater detail under the No Significant Hazards Determination.

Finally, it is proposed to change a typographical error in the description of the Suppression Pool Cooling/Spray valves and change the isolation signals for two of these valves, HV-151F011 A and B (as shown on Attachment B, p.3) from signals "B" and "C" to signal "G".

No Significant Hazards Determination

I. The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated for the following reasons:

A. Table 3.3.2-1: This change is purely administrative in nature. It will restore the Technical Specifications to correctly reflect the

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decisions rendered by the NRC in Amendment 4 to the operating license.

- B1. Table 3.6.3-1, Valves HV-151F122 A and B: Previous evaluations do not take credit for automatic isolation of the subject valves; the plant design shows them as completely manual valves that can only be opened (and maintained open) by continuous operator action.
- B2. It is also requested that the functional description of the subject valves be changed to indicate their purpose in a more accurate manner. This change is purely administrative in nature.
- C1. Table 3.6.3-1, Valves Hv-151F011 A and B: Currently, the Table requires isolation on "B", Reactor Vessel Level 2, or on "C", Main Steam Line High Radiation. The correct signal, as proposed is "G", which is Drywell High Pressure or Reactor Vessel Level 1.

These valves are normally closed and are only open for the initiation of the steam condensing mode of RHR. As such there were no automatic isolations or failure modes assumed for these valves and they were not included in any safety analysis.

- C2. It is also requested that a typo be corrected in the functional description of these valves; this change is purely administrative in nature.
- II. The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated for the following reasons:
- A. Table 3.3.2-1: See IA above.
  - B1. Table 3.6.3-1, Valves HV-151F122 A and B: No change in design (for which previous evaluations took credit) is proposed.
  - B2. See IB2 above
  - C1. Table 3.6.3-1, Valves HV-151F011 A and B: No change in design which would cause a need for these valves to be considered in any safety analysis is proposed.
  - C2. See IC2 above.
- III. The proposed change does not involve a significant reduction in a margin of safety for the following reasons:
- A. Table 3.3.2-1: See IA above.
  - B1. Table 3.6.3-1, Valves HV-151F122 A and B: These valves are normally closed and are only opened for brief periods to equalize pressure



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around the LPCI Injection Line check valves (E11-F050A&B) during tests of these valves. The 151F122A&B valves will remain open only so long as an operator continues to hold down the appropriate switch on the emergency core cooling bench board (1C601). Due to the extremely limited use and duration of use of these valves, and the requirement that continuous operator action is required to maintain these valves in the open position, no automatic isolations or failure modes have been assumed for these valves and they have not been included in any safety analyses.

There is no safety concern that these valves are manual and without automatic isolation features because the following coincident events would have to occur before any safety questions are raised:

- (1) An accident that does not depressurize the vessel occurs.
- (2) Valve E11-F015 (the redundant isolation valve), which is interlocked so that it cannot be opened at an RPV pressure above approximately 450 psig, fails open with the RPV above 450 psig.
- (3) The accident occurs during the brief period E11-F050 is being tested, or an operator incorrectly opens 151F122A or B during the event, and continues to hold it open.

The constitutes a sequence of events, failures and operator errors that are not credible.

B2. See IB2 above.

C1. Table 3.6.3-1, Valves HV-151F011 A and B: As a potential open path from the containment these valves should isolate on a drywell high pressure, which they do. To provide diversity and in anticipation of an event that could threaten the vessel (i.e. an event that uncovers the core) low RPV level was selected as an alternate signal. Since any level above the core would be acceptable from a safety standpoint, a level compatible with the ECCS function of RHR, Level 1, was selected. At Level 1 LPCI initiates and the 151F011A&B valves are located in a section of the RHR system that is isolated from the LPCI function by the automatic line up of valves for LPCI.

The main steam line high radiation signal is not an appropriate isolation signal for these valves. These valves are normally closed except for a brief period at the initiation of steam condensing. This mode of RHR is used when the preferred heat sink, the condenser, is isolated from the RPV by closure of the MSIV's. This MSIV closure also isolates the Main Steam Line High Radiation Monitors from the anticipated source of radiation, the RPV, thereby negating the usefulness of this signal. Even considering the case where these valves are left open at the wrong time the lack of a Main Steam Line High Radiation Signal is not a safety concern. Events that cause a



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high radiation level can be broken into two broad categories, those that cause a low RPV water level and/or high drywell pressure (e.g. LOCA), and those that do not (e.g. Rod Drop accident). For the first category the existing isolation signals will close these valves. For the second category, given the flow path through these valves and the lack of a high drywell pressure, the only potential result is the flow of contaminated water from outside containment back into containment, which is not a safety concern.

C2. See IC2 above.

We have determined this amendment to be Class III in nature and the appropriate fees pursuant to 10CFR170.22 are enclosed.

Very truly yours,



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

Attachments

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

Thomas M. Gerusky, Director  
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