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

SUBJECT: Requests exigency for proposed Amend 31 to License NPF-14, changing Tech Specs to prevent derating during preoperational test.Change would provide more reliable timer setting.

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NOV 07 1983

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

SUSQUEHANNA STEAM ELECTRIC STATION
REQUEST FOR EXIGENCY FOR PROPOSED AMENDMENT NO. 31
ER 100450 FILE 841-8
PLA-1941 Docket No. 50-387

Reference: Letter, PLA-1910, N. W. Curtis to A. Schwencer, dated October 20, 1983

Dear Mr. Schwencer:

The purpose of this letter is to request that the proposed Technical Specification change requested in the above referenced letter be processed in accordance with 10 CFR 50.91 (a)(6).

The proposed Technical Specification change needs to be implemented approximately two weeks prior to starting our preoperational test (P200) on the electrical system for both Unit 1 and Unit 2. This preoperational test is scheduled to begin December 15, 1983; therefore this proposed change to the Technical Specifications must be issued on or before December 1, 1983. If this change is not issued during this time frame, Susquehanna SES Unit 1 will have to remain shutdown longer than anticipated in order to complete this preoperational test. Therefore, without NRC approval by December 1, this proposed change to the Technical Specifications will, in effect cause Susquehanna SES Unit 1 to be derated. Also, this change is needed in order to support the completion of the preoperational test program for Susquehanna SES Unit 2. Not issuing this proposed change to the Technical Specifications will therefore also cause a delay in the fuel load of Unit 2.

It is Pennsylvania Power & Light Company's opinion that this request to process this change to the Technical Specifications on an exigency basis is similar to the example of an exigency given in the Federal Register (48FR14877):

> "For instance, such a circumstance may arise where a licensee, while shutdown for a short time, wishes to add some component clearly more reliable than one presently installed or wishes to use a different method of testing some system and that method is clearly better than one provided for in its Technical

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Specifications. In either case, the licensee may have to request an amendment, and, if the Commission determines, among other things, that no significant hazards consideration is involved, it may wish to grant the request before the licensee starts the plant up and the opportunity to improve the plant is lost."

The proposed change to the Technical Specifications would provide a more reliable timer setting for the Emergency Service Water System pump loading timers for 2 unit operation as discussed in the above referenced letter. Also, the change would afford the opportunity of testing the reliability of the electrical system for two unit operation without jeopardizing the startup of Unit 1 following the tie-in outage of Unit 2. Also as stated in the above referenced letter there is no significant hazards consideration involved.

This proposed change to the Technical Specifications should be processed in accordance with 10 CFR 50.91(a)(6). This exigency could not have been avoided. When the change to the Technical Specifications was originally proposed, it was anticipated that this change would not have any affect on the preoperational testing of Unit 2 and would therefore only be needed to support the operation of two units. As planning for the tie-in outage progressed, it was uncovered that some modifications and completion of the preoperational test (P200) could not be performed without this proposed change to the Technical Specifications being issued. During the week of October 31, 1983, several work around plans were considered; however, each one of them resulted in the need for NRC approval of this proposed Technical Specification change by December 1, 1983. It is Pennsylvania Power and Light Company's opinion that we made every effort to make a timely application for the proposed change to the Technical Specifications in order not to create the exigency and to take advantage of 10 CFR 50.91(a)(6). However, an exigency does exist despite our best efforts, therefore, this proposed change to the Technical Specifications should be processed in accordance with 10 CFR 50.91(a)(6).

If you have any questions or comments, please contact us.

Very truly yours,

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

cc: R. L. Perch NRC

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