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SCHWENCER,A. Licensing Branch 2

SUBJECT: Forwards application for Amend 33 to License NPF-14 proposing administrative change to Tech Specs by revising Section 2.G re reporting violations.Class II license amend fee encl.

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[illegible] administrative [illegible] to [illegible] y revision [illegible] violations, [illegible] license [illegible]

[illegible]

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DEC 08 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 NO. 33 TO LICENSE NO. NPF-14
ER 100450 FILE 841-2
PLA-1935 Docket No. 50-387

Dear Mr. Schwencer:

The purpose of this letter is to propose an administrative change to the Susquehanna SES Facility Operating License NPF-14 to make paragraph 2.G consistent with NRC rule changes effective January 1, 1984.

NRC has amended its regulations in 10CFR50.72 and issued new regulations in 10CFR50.73 as part of an effort to ensure consistent and coordinated reporting requirements. The existing paragraph 2.G of NPF-14 is consistent with Section 6.9.1.8 of Appendix A, Technical Specifications, which will be replaced by the new regulations on January 1, 1984. To be consistent with the new requirements, the following revised wording for paragraph 2.G(a) is proposed:

> PP&L shall report any violations of the requirements contained in Section 2, Items C(1), C(3) through C(32), and F of this license within twenty-four (24) hours. Initial notification shall be made in accordance with the provisions of 10CFR50.72 with written followup in accordance with the procedures described in 10CFR50.73 (b), (c), (d), and (e).

Paragraph 2.G(b) of NPF-14 should be deleted. Based on the amended 10CFR50.72, paragraph 2.G(b) no longer appears to be necessary since it duplicates the reporting requirements in the rule.

Pursuant to 10CFR50.91(a)(1), PP&L has determined that the proposed amendment involves no significant hazards considerations. As provided in NRC's statement of considerations (48FR14864) the proposed amendment is an example of a change which involves:

> (vii) A change to make a license conform to changes in the regulations, where the license change results in very minor changes to facility operations clearly in keeping with the regulations.



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No Significant Hazards Determiniation

I. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed change only affects the method of reporting certain events and the timing of the written followup report to make these consistent with the new regulations.

II. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated. There are no hardware or other design changes associated with the proposed change. Operational considerations are limited to those described in I above.

III. The proposed change does not involve a significant reduction in a margin of safety. This is clear from I and II above.

Pursuant to 10CFR50.91(b)(1), a copy of this application and significant hazards consideration analysis have been provided to the State.

We have determined this change to be Class II in nature and have enclosed the appropriate fee pursuant to 10CFR170.22.

Very truly yours,

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

Affidavit

cc: R. L. Perch - USNRC
G. G. Rhoads - USNRC

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