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

SUBJECT: Forwards application for Amend 35 to License NPF-14,deleting License Condition 2.C.28 (h), "Station Blackout Test" to be consisitent w/Generic Ltr 83-24.

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	NRR/DSI/ICSB 16	1	1	NRR/DSI/METB 12	1	1
	NRR/DSI/PSB 19	1	1	NRR/DSI/RAB 22	1	1
	NRR/DSI/RSB 23	1	1	REG FILE 04	1	1
	RGN1	3	3	RM/DDAMI/MIB	1	0
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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FILE:50-397 [illegible] Iowa Electric Light and Power Co. [illegible]
AUTH.NAME [illegible] AFFILIATION
CURTIS,N.W. Consolidated Power & Light Co.
KLEIN,W.M. [illegible] AFFILIATION
DOCKET NUMBER. Licensing Branch 2

SUBJECT: Forwards application for Amend 35 to License DPR-49,deletion License Condition 2.C.2d (8), "Station Blackout Test" to be consistent w/Generic Ltr 84-24.

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TITLE: Licensing Submittal: PSAR/FSAR Amdts & Related Correspondence

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	IE/DEPEP/EPB 36	1	1	IE/DEPER/IRB 35	1	1
	NRR/DHQ/QAB 21	1	1	NRR/DE/AEAB	1	0
	NRR/DE/CEB 11	1	1	NRR/DE/EHEB	1	1
	NRR/DE/EQB 13	2	2	NRR/DE/MEB 18	1	1
	NRR/DE/MTB 16	1	1	NRR/DE/SGB 20	1	1
	NRR/DL/SAB 24	1	1	NRR/DHFS/LQB 32	1	1
	NRR/DHFS/PTB 40	1	1	NRR/DLPQ/HFB	1	0
	NRR/DSI/ICSB	1	1	NRR/DSI/AEB 26	1	1
	NRR/DSI/CPB 10	1	1	NRR/DSI/CSB 09	1	1
	NRR/DSI/ICSB 10	1	1	NRR/DSI/RAB 22	1	1
	NRR/DSI/PSB 19	1	1	RGN3 FILE 04	1	1
	NRR/DSI/RSB 23	1	1	RGN[illegible]	1	0
	RGN1	1	1			
EXTERNAL:	ACRS 41	6	6	BNL (AMDTS ONLY)	1	1
	NRC PDR	1	1	FEMA-REP DIV 39	1	1
	NSIC 05	2	2	NSIC PDR 02	1	1
		1	1	NTIS	1	1
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PP&L Pennsylvania Power & Light Company
Two North Ninth Street • Allentown, PA 18101 • 215 / 770-5151

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

DEC 09 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
PROPOSED AMENDMENT NO. 35 TO OPERATING
LICENSE NO. NPF-14
ER 100450 FILE 841-2
PLA-1965 Docket No. 50-387

Dear Mr. Schwencer:

The purpose of this letter is to propose the deletion of License Condition 2.C.28(b) [Station Blackout Test (SBO)] of Susquehanna SES Unit 1 Operating License No. NPF-14 to be consistent with the guidance given in Generic Letter 83-24 dated June 29, 1983.

As stated in Generic Letter 83-24:

> "The Staff has received commitments from each new operating license holder to conduct the test during the first fuel cycle when decay heat is available. However, the Susquehanna licensee, Pennsylvania Power & Light (PP&L), has indicated that a simulated loss of all AC power test would subject the drywell to a severe temperature and humidity transient having the potential of damaging equipment in the drywell. At least two other BWR licensees have indicated that they would terminate the test prior to exceeding certain temperature limits in the drywell. Upon further review of the basis for the requirement, the practicalities and value of such a test, and the proposed augmented Owners' Group program, we conclude that the SBO test does not provide significant new information to justify its performance. Furthermore, since one of the original criteria for I.G.1 special tests (as stated in the Sequoyah SER) is that the test must not pose a hazard to plant equipment, the staff now recommends that the SBO test be deleted from the BWR I.G.1 staff position.
>
> The staff finds that if it can be demonstrated that temperature and/or other SBO test conditions would adversely impact and pose a hazard to plant equipment, the BWR Owner's Group recommendations by themselves would constitute compliance with Item I.G.1, since performance of the SBO test under less adverse conditions would not provide significant benefit for either training or design feedback.

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Nor has the staff identified other special tests that should be performed at BWR's at this time. Therefore, the staff concludes that, unless the need is identified in the resolution of Generic Issue A-44, "Station Blackout", the SBO test should not be required at BWR's."

With respect to the staff's position in Generic Letter 83-24 on demonstrating the adverse impact on plant equipment of a SBO test, Pennsylvania Power and Light Company (PP&L) submitted a Safety Evaluation Report on Station Blackout Testing at SSES on June 15, 1982. PP&L concluded that a station blackout test unnecessarily jeopardizes plant equipment and the public since equipment will be exposed to environmental conditions close to qualification limits and reanalysis and/or replacement will be required. With this safety evaluation, PP&L has satisfied the staff's concern on adverse impact on plant equipment from a SBO test.

With respect to the staff's position on performing the BWR Owner's Group recommendations, PP&L has committed to these recommendations in the FSAR Table 18.2-1 and has conducted these tests during the startup test program for Susquehanna SES Unit 1. Since these tests have been completed, PP&L has satisfied the staff's position on the BWR Owners Group recommendations.

It is our understanding that the resolution and implementation of Generic Issue A-44 is scheduled for late in the third quarter of 1984 which is the time frame of our refueling outage. Therefore the resolution of the Generic Issue A-44 would be after our first cycle and deleting this license condition would not have any impact on the resolution of Generic Issue A-44.

Based on the above justification, PP&L proposes that License Condition 2.C.28(b) be deleted.

Pursuant to 10 CFR 50.91, PP&L has determined that the proposed amendment involves no significant hazard considerations. As provided in NRC's statement of considerations (48FR14870) the proposed amendment is similar to the 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."

The proposed amendment will not:

1) Involve a significant increase in the probability or consequences of an accident previously evaluated since deletion of the SBO test will not affect plant operations or subject the equipment to any abnormal conditions which were not previously evaluated; or

2) Create the possibility of a new or different kind of accident from any accident previously evaluated since not performing the SBO test will not subject the equipment to any abnormal conditions which were not previously evaluated; or

3) Involve a significant reduction in a margin of safety since not performing the SBO test will not expose the plant equipment to environmental conditions close to qualification limits.

PP&L has determined this change to be Class II in nature and has enclosed the appropriate fee pursuant to 10 CFR 170.22.

Very truly yours,

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

Enclosure

cc: R. L. Perch NRC

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