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ACCESSION NBR:8402270429 DOC.DATE: 84/02/22 NOTARIZED: NO DOCKET #
FACIL:50-387 Susquehanna Steam Electric Station, Unit 1, Pennsylva 05000387
50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylva 05000388
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SCHWENCER,A. Licensing Branch 2

SUBJECT: Discusses mod of automatic depressurization sys Logic,per NUREG-0737,Item II.K.3.18.Proposes that NRC allow bypassing inhibit switch on Unit 2 util first refueling outage on Unit 1.

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FEB 22 1984

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
TMI ITEM II.K.3.18
ER 100450 FILE 841-2 Docket Nos. 50-387
PLA-2090 50-388

References: 1. Letter, A. Schwencer (NRC) to N. W. Curtis (PP&L), "Susquehanna Automatic Depressurization System (ADS) Timer Setting", September 20, 1983.

2. Letter, BWROG 8260, T. J. Dente (BWROG) to D. G. Eisenhut (NRC), "NUREG 0737 Item II.K.3.18, "Modification of Automatic Depressurization System Logic", October 28, 1982.

Dear Mr. Schwencer:

Reference 1 provided the NRC staff's acceptance of PP&L's adoption of Option 4 of the BWR Owners Group Report provided in Reference 2, contingent upon the following conditions:

"(1) Installation on Unit 1 must be completed prior to startup following the first refueling outage; Unit 2 installation must be completed prior to initial criticality,
(2) Technical Specifications must be provided for the bypass timer and manual inhibit switch,
(3) Use of the inhibit switch must be addressed in the plant emergency procedures, and
(4) A plant specific analysis must be provided to justify the ADS high drywell pressure permissive bypass timer setting".

Reference 1 also provided the staff's acceptance of condition (4), which resulted in an analytic limit of 480 seconds being established for the timer setting.

However, after a closer review of the other conditions as they apply to the manual inhibit switch, we have discovered that compliance with these conditions will force PP&L to make premature decisions on yet-to-be resolved industry issues.

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The manual inhibit switch is provided in Option 4 to allow the operator to prevent automatic ADS initiation during an ATWS event if RPV water level has been recovered above Level 1. This scenario, however, presupposes that PP&L has committed to contingency 7 of the BWR Emergency Procedure Guidelines. PP&L has not done this and is not prepared to make such a commitment at this time.

The other effect compliance will have, due to the difference in timing between units, is on operator training. Operators at Susquehanna are qualified on both Units 1 and 2. Therefore, each operator is trained to be fully cognizant of all design and procedural differences between units. However, PP&L believes that it is prudent to limit the need for such training wherever possible for obvious reasons. Under the staff's current requirements, operators will have to be trained on (as yet unwritten) procedures for the installed switch on Unit 2, while such procedures and hardware will not exist on Unit 1 until the first refueling outage of Unit 1.

PP&L doesn't believe that either of the above conflicts are necessary or acceptable. We note that in the two most recent BWR Operating Licenses issued, LaSalle-2 and WNP-2, these conditions are not required to be met until the first refueling outages for the units, while our current Unit 2 schedule per reference 1 is initial criticality.

PP&L has already installed both the timer and inhibit switch on Susquehanna Unit 2. We therefore propose that the NRC allow bypassing of the inhibit switch on Unit 2 until the first refueling outage on Unit 1, at which time operator training and emergency procedures based on identical ADS logic modifications to both units could be accomplished.

If you have any questions on this matter, please contact Mr. R. Sgarro at (215) 770-7855.

Very truly yours,

NW Curtis

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

cc: R. L. Perch - USNRC
T. Collins - USNRC