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 EISENHUT, D.G. Division of Licensing

SUBJECT: Responds to Generic Ltr 84-20 re scheduling guidance for licensee submittals of reloads involving unreviewed safety questions. Reload analyses cannot be provided 6 months prior to restart. Analyses will be provided by 850116.

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SEP 07 1984

Darrell G. Eisenhut, Director
Division of Licensing
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U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION
RELOAD SUBMITTAL SCHEDULE
ER 100450 FILE 249-01
PLA-2296

Docket No. 50-387

Reference: Generic Letter 84-20, "Scheduling Guidance for Licensee Submittals of Reloads that Involve Unreviewed Safety Questions," dated August 20, 1984.

Dear Mr. Eisenhut:

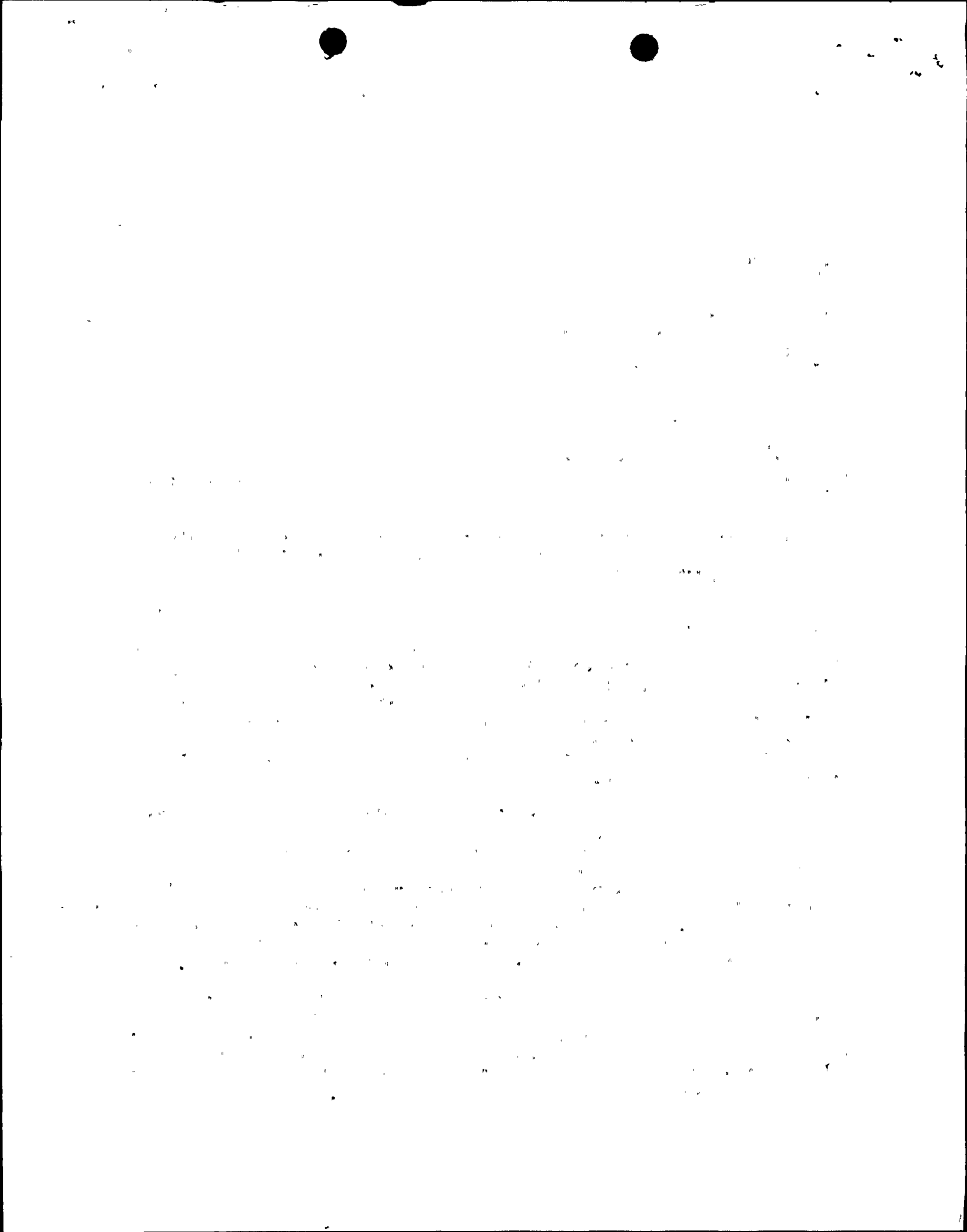
The referenced letter provides guidance on the scheduling of licensee submittals on reloads. It establishes a general policy that for reloads requiring a license amendment licensees should submit analyses at least six months prior to the projected restart date, or timely restart may be jeopardized. Such a schedule is impractical, conflicts with precedent and is impossible for us to comply with this late in the planning cycle for the Susquehanna 1 first reload.

Generally, it is impractical to submit reload analyses six months prior to restart since reload analyses must envelope the precise end of cycle core conditions. Although the analyses allow for some range of core exposures, this window is small and necessitates on accurate projection of plant operations. Since the complex calculations required for the reload analyses take from six to eight months to perform, accurate projection of end of cycle conditions far enough in advance to allow six months for staff review is not possible. The start of the analyses must be as close as possible to the refueling date to avoid impacting plant operation in subsequent cycles.

PP&L has expended considerable time developing a schedule for our first refueling outage. A key component of this schedule is the time required for NRC review. We based our schedule allowance for NRC review on a comprehensive review of industry experience since Sholly took effect coupled with informal staff feedback that 90 days is a normal review time. The guidance in Generic Letter 84-20 substantially disagrees with this premise.

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SSES PLA-2296
ER 100450 File 249-01
Darrell G. Eisenhut

This late in our planning, PP&L has no flexibility which would allow submittal of our Susquehanna 1 reload analyses six months prior to planned restart. We plan to install Exxon fuel in early 1985. All but one of the models and methods we plan to rely on are NRC approved. The one exception is currently under review by the staff. We intend to submit our reload analyses on January 16 and to restart on May 11, 1985. We would appreciate your assurance that this schedule is achievable.

Very truly yours,



N. W. Curtis

Vice President-Engineering & Construction-Nuclear

