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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 to Licenses NPF-14 & NPF-22, requiring performance of nonlinear analysis to qualify in-vessel rack to SQRT criteria & provide qualification documentation for review prior to first outage.Fee paid.

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Vice President-Engineering & Construction-Nuclear
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SEP 19 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
PROPOSED AMENDMENT 44 TO LICENSE NPF-14
AND PROPOSED AMENDMENT 6 TO LICENSE NPF-22
ER 100450/100508 FILE 841-2 Docket No. 50-387
PLA-2252 50-388

Dear Mr. Schwencer:

The purpose of this letter is to propose a change to License Condition 2.C.(23)(b) of License No. NPF-14 and License Condition 2.C.(8)(b) of License No. NPF-22. These conditions require PP&L to perform the nonlinear analysis to qualify the In-Vessel Rack (F22-E006) to the SQRT criteria and provide the qualification documentation to the NRC staff for review and approval prior to commencement of the first refueling outage.

Current planning for the first refueling outage of each unit is to off-load the core, thereby eliminating the need for the in-vessel rack during the refueling outage. Consequently, there is no need to qualify the in-vessel rack prior to the refueling outage. We request that these License Conditions be changed to read as follows: Prior to use, PP&L shall complete qualification and documentation for the in-vessel rack (F22-E006).

Pursuant to 10CFR50.91(2)(1), PP&L has determined that the proposed amendment involves no significant hazards considerations. An analysis in accordance with 10CFR50.92 is attached.

Pursuant to 10CFR50.91(b)(1), copies of this application and the significant hazards consideration analysis have been provided to the Commonwealth of Pennsylvania.

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Pursuant to 10CFR170.21, the application fee for a Category A Amendment is enclosed.

Very truly yours,

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

Attachment

cc: R. L. Perch - NRC

Thomas M. Gerusky, Director
Bureau of Radiation Protection
Pennsylvania Department of Environmental Resources
P.O. Box 2063
Harrisburg, PA 17120

NO SIGNIFICANT HAZARDS EVALUATION

It is PP&L's position that delaying the qualification of the in-vessel rack to prior to its use will not:

1) Involve a significant increase in the probability or consequences of an accident previously evaluated since the in-vessel rack is not necessary to perform any core manipulations, but is rather, a device which can be used as a convenience. Credit for its use is not taken in any safety analysis.

2) Create the possibility of a new or different kind of accident from the type previously evaluated since the in-vessel rack is not planned to be utilized during the refueling operation nor is use required to perform any core manipulation.

3) Result in a significant reduction in the margin of safety since the procedures involved in the refueling or any other core manipulation do not require the use of the in-vessel rack.