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KENYON,B.D. Pennsylvania Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
SCHWENCER,A. Licensing Branch 2

SUBJECT: Application to amend License NPF-14,changing Tech Spec 4.1.3.1.4 re surveillance requirements for reactivity control sys to allow exemption from Spec 4.0.4 for entry into Operational Condition 2.

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OCT 19 1984

Bruce D. Kenyon
Vice President-Nuclear Operations
215/770-7502

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
REQUEST FOR EMERGENCY CHANGE TO
TECHNICAL SPECIFICATION 4.1.3.1.4
ER 100450 FILE 841-8
PLA-2338 Docket No. 50-387

Dear Mr. Schwencer:

The purpose of this letter is to request that the portion of the change to Technical Specification 4.1.3.1.4 regarding the footnote which was submitted in proposed Amendment 43 to License No. NPF-14 on May 18, 1984 be processed as an emergency change in accordance with 10CFR50.91.

A marked-up copy of Technical Specification 4.1.3.1.4 showing the proposed change is attached.

This proposed change which requests an exemption from Specification 4.0.4 was provided so that OPERATIONAL CONDITION 2 could be entered to perform the required surveillance without requiring any interpretation. As such, this administrative change is an example of no significant hazards consideration as cited in column 3, paragraph (i) of 48FR14870. This proposed change has been included in the Susquehanna SES Unit 2 Technical Specifications and is consistent with recently issued BWR Technical Specifications.

The processing of this request to change the Technical Specifications in accordance with 10CFR50.91(5) is justified because in order to perform the required surveillance, the unit would have to enter Operational Condition 2, however the existing Technical Specification does not allow this. The unit would have to remain shutdown since it could not enter Operational Condition 2 to perform the necessary surveillance and thus declare the scram discharge volume operable.

This emergency situation could not have been avoided since it was not anticipated that the scram discharge volume drain and vent valves would not close within 30 seconds and that there was no way to retest them to declare them operable.

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As soon as the proposed Technical Specification change is approved, Susquehanna SES Unit 1 will be retested and restarted.

The Commonwealth of Pennsylvania has been notified as to our intention to change this Technical Specification via a letter (PLA-2208) dated May 18, 1984 and by copy of this letter.

We consider that this proposed change meets the criteria for an exclusion as defined in 10CFR51.22(C)(9) since:

1. This change is an example of a change which contains no significant hazards as cited in column 3, paragraph (1) of 48FR14870.

2. This change does not involve a significant change in the types or significant increase in the amounts of any effluents that may be released offsite because the change only involves only a clarification of when the surveillance is performed and not a change in the surveillance.

3. This change does not involve a signficant increase in individual or cumulative occupational radiation exposure because the method of performing the surveillance does not change only the clarification of when the surveillance be performed.

If you have any questions, please contact us.

Very truly yours,

B. D. Kenyon
Vice President-Nuclear Operations

Attachments

cc: R. L. Perch USNRC
R. H. Jacobs USNRC

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