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 FACIL: 50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylvania 05000388
 AUTH. NAME: CURTIS, N.W. AUTHOR AFFILIATION: Pennsylvania Power & Light Co.
 RECIP. NAME: SCHWENCER, A. RECIPIENT AFFILIATION: Licensing Branch 2

SUBJECT: Requests relief from performance of hydrostatic test during percommercial outage. Liquid penetrant exam or radiographic exam will be performed to establish integrity of weld. Requests acceptance by 841214. Fee paid.

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Pennsylvania Power & Light Company

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

NOV 02 1984

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
RELIEF REQUEST
ER 100508 FILE 841-2
PLA-2345

Docket No. 50-388

Dear Mr. Schwencer:

During the Susquehanna SES Unit 2 Nov.-Dec. 1984 precommercial outage, Pennsylvania Power & Light Company intends to make a cut in an ASME Class 2 non-safety-related main steam drip leg drain line to remove a suspected blockage in the line and then reweld the line. Under ASME Section XI, a 1.25 X Design Pressure hydrostatic test is required following the repair.

The hydrostatic test for the 1½" weld will involve removal of main steam relief valves (since the MSIV's cannot be used for isolation on the outboard side), pressurizing the reactor vessel, and pressurizing against a turbine stop valve which, if it leaks, could allow water into the HP turbine.

Since isolation of the ASME Class 2 drain line from the primary system is not feasible, PP&L requests relief from the performance of a hydrostatic test during the precommercial outage. The weld is included in the Susquehanna SES ISI plan but, as previously stated, it is classified as non-safety-related.

To establish the integrity of the weld, PP&L will perform a liquid penetrant exam if the repair weld is a socket weld or, a radiographic exam if a full penetration weld is performed. In addition, a VT-2 examination will be performed at normal operating conditions when the line is returned to service. Finally, a VT-2 examination of the weld will again be performed during the first scheduled ISI hydrostatic test for the line.

The above approach is consistent with the requirements of ASME Code Case N-416 which has been approved by the main committee but has not yet been issued.

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PDR

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Redd w/Chcc #15000*

The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that every entry should be supported by a valid receipt or invoice. This ensures transparency and allows for easy verification of the data.

Furthermore, it is noted that the records should be kept in a secure and accessible format. Regular backups are recommended to prevent data loss in the event of a system failure or disaster.

The second part of the document outlines the procedures for handling discrepancies. It states that any variance between the recorded amounts and the actual physical counts should be investigated immediately. The cause of the discrepancy should be identified, and corrective actions should be taken to prevent recurrence.

Finally, the document stresses the need for strict confidentiality of the information. Only authorized personnel should have access to the records, and all data should be protected from unauthorized disclosure.

In addition, the document provides guidelines for the retention of records. It specifies that certain types of records, such as those related to financial statements and tax filings, must be retained for a minimum of seven years. Other records may have shorter retention periods, depending on their nature and the applicable regulations.

It is also advised that the records should be reviewed periodically to ensure their accuracy and relevance. This review process should involve a cross-check of the records against the source documents to identify any errors or omissions.

The document concludes by reiterating the importance of a robust record-keeping system. A well-maintained system not only facilitates compliance with legal requirements but also provides valuable insights into the organization's operations and financial health.

The following table provides a summary of the key points discussed in the document. It serves as a quick reference for the reader and highlights the most critical aspects of the record-keeping process.

Topic	Key Points
Record Accuracy	Every entry must be supported by a valid receipt or invoice.
Data Security	Records should be kept in a secure and accessible format with regular backups.
Discrepancy Handling	Any variance between recorded amounts and actual counts should be investigated immediately.
Confidentiality	Records should be kept confidential and accessible only to authorized personnel.
Retention Periods	Financial and tax records must be retained for at least seven years.
Review Process	Records should be reviewed periodically to ensure accuracy and relevance.

In conclusion, the document emphasizes that a strong record-keeping system is essential for the success and compliance of any organization. By following the guidelines outlined here, you can ensure that your records are accurate, secure, and reliable.

NOV 02 1984

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SSES
ER 100508

PLA-2345
File 841-2

Please provide your acceptance by December 14, 1984.

Pursuant to 10CFR170.22 the appropriate fee is enclosed.

Very truly yours,



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

Enclosure

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

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