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AUTH.NAME AUTHOR AFFILIATION
CURTIS,N.W. Pennsylvania Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
SCHWENCER,A. Licensing Branch 2

SUBJECT: Forwards application to amend NPF-14,revising Conditions 2.B.(1) & 2.B.(2) to be consistent w/Unit 2 license. Withdrawal of 830131 proposed Amend 18 to NPF-14 requested. Fee paid.

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NOV 26 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 55 TO LICENSE NPF-14
ER 100450 FILE 841-2
PLA-2351 Docket No. 50-387

Dear Mr. Schwencer:

The purpose of this letter is to propose changes to License No. NPF-14 and withdrawal of PLA-1510 dated January 31, 1983 which transmitted proposed Amendment 18 to NPF-14.

In particular, Section 2.A of the License reads in part as follows: "...in the licensees' Final Safety Analysis Report, as supplemented and amended through Amendment 48, and the licensees' Environmental Report as supplemented and amended through Amendment 48." Section 2.B.(2) of the License reads: "...as described in the Final Safety Analysis Report, as supplemented and amended through Amendment 48.

The wording in these sections should be consistent with the Unit 2 License (NPF-22) and PP&L proposes the following changes:

- Section 2.A "...in the licensees' Final Safety Analysis Report as supplemented and amended, and the licensees' Environmental Report as supplemented and amended."

- Section 2.B.(2). "... as described in the Final Safety Analysis Report, as supplemented and amended."

The basis for our proposal is 10CFR50.71(e) which states FSAR updates "include the effects of: all changes made in the facility or procedures as described in the FSAR; all safety evaluations performed by the licensee either in support of requested license amendments or in support of conclusions that changes did not involve an unreviewed safety question; and all analysis of new safety issues performed by or on behalf of the licensee at Commission request." In essence, this regulation provides assurance that any FSAR change will be reviewed/approved by the Commission or by the utility via the safety evaluation process. In light of this requirement it is not appropriate to amend the Operating license for a periodic review requirement.

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Regarding the Environmental Report, few changes - if any at all - are anticipated since PP&L has received its operating license. However, modifications to the report are handled in the same manner as FSAR changes, i.e. they will have prior approval.

The proposed changes do not:

(1) involve a significant increase in the probability or consequences of an accident previously evaluated,

(2) create the possibility of a new or different kind of accident from any accident previously evaluated, or

(3) involve a significant reduction in a margin of safety.

This determination is based on the requirements as described above, and therefore is an example as provided in 48FR14870, Column 3, paragraph (i).

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

Pursuant to 10CFR170.21, the appropriate fees are enclosed.

Very truly yours,

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

cc: M. J. Campagnone - NRC
R. H. Jacobs - NRC

T. M. Gerusky, Director
Bureau of Radiation Protection
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