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Bruce D. Kenyon
*Vice President-Nuclear Operations*
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DEC 26 1984

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Dr. T. E. Murley
Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

SUSQUEHANNA STEAM ELECTRIC STATION
REVISION TO IE BULLETIN 83-03 RESPONSE
ER 100450/100508 FILE 842-03
PLA-2364

Docket Nos. 50-387
and 50-388

Reference: (1) PLA-1697 dated 6/9/83

Dear Dr. Murley:

In reference (1) PP&L provided its response to IE Bulletin 83-03, "Check Valve Failures in Raw Water Cooling Systems of Diesel Generators." In our response we listed the following check valves which supply cooling water to the diesels and which are required to change state to accomplish this task:

| | | |
|---|---|---|
| 0-11-001 | 0-11-033 | 0-11-037 |
| 0-11-002 | 0-11-034 | 0-11-038 |
| 0-11-003 | 0-11-035 | 0-11-039 |
| 0-11-004 | 0-11-036 | 0-11-040 |

In our submittal, we committed to verify the operability and internal integrity of these valves by valve disassembly and inspection. The initial inspection of the 12 valves listed above was to be performed during the Unit 1 first refueling outage with subsequent inspections of half the valves listed on an alternating basis during every Unit 1 refueling outage thereafter. The purpose of this letter is to revise the commitments made in Reference (1) and provide justification for an alternative inspection.

In order to disassemble and inspect all of the check valves as previously committed, it would be necessary to drain down the ESW Loops since the isolation function at each diesel is provided via butterfly valves which have leaked in the past. Recent leakage testing has shown that the isolation afforded via these butterfly valves will probably allow disassembly and inspection of the majority of the check valves. However, for 2 check valves (0-11-035 & 0-11-036 on the "C" Diesel), this disassembly may not be possible without draining both loops of ESW. Removing both loops of ESW from service necessitates a two-unit outage.



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As an alternative to disassembly of all the check valves, we propose an inspection of as many of the check valves as is practical based on the ability of the butterfly valves to isolate the check valves for this inspection. The inspection then will include all the check valves at the pump discharges (0-11-001, 0-11-002, 0-11-003, & 0-11-004) and at least half the check valves located just prior to the diesel intercoolers (see attached figure). PP&L believes that this alternate inspection will provide adequate assurance of the integrity of the valves which are not inspected since the alternate inspection will encompass valves from the same manufacturer, in identical system locations, and under equivalent service conditions. In addition, a sampling of the valves as proposed is consistent with ASME Section XI inspection guidelines, offers a good representative sample, and affords us the necessary flexibility to work around the butterfly valve leakage problem. If any of the valves inspected show evidence of the problems noted in IE Bulletin 83-03, then PP&L will take the necessary actions to ensure the integrity of the remainder of the valves during the same outage.

In the long term, PP&L is evaluating several solutions to this leakage problem. The information gained from the inspections during the first refueling outage will be factored into the evaluation of a long term solution. PP&L has committed to supply a report detailing the results of this first valve inspection 90 days after the completion of the inspections.

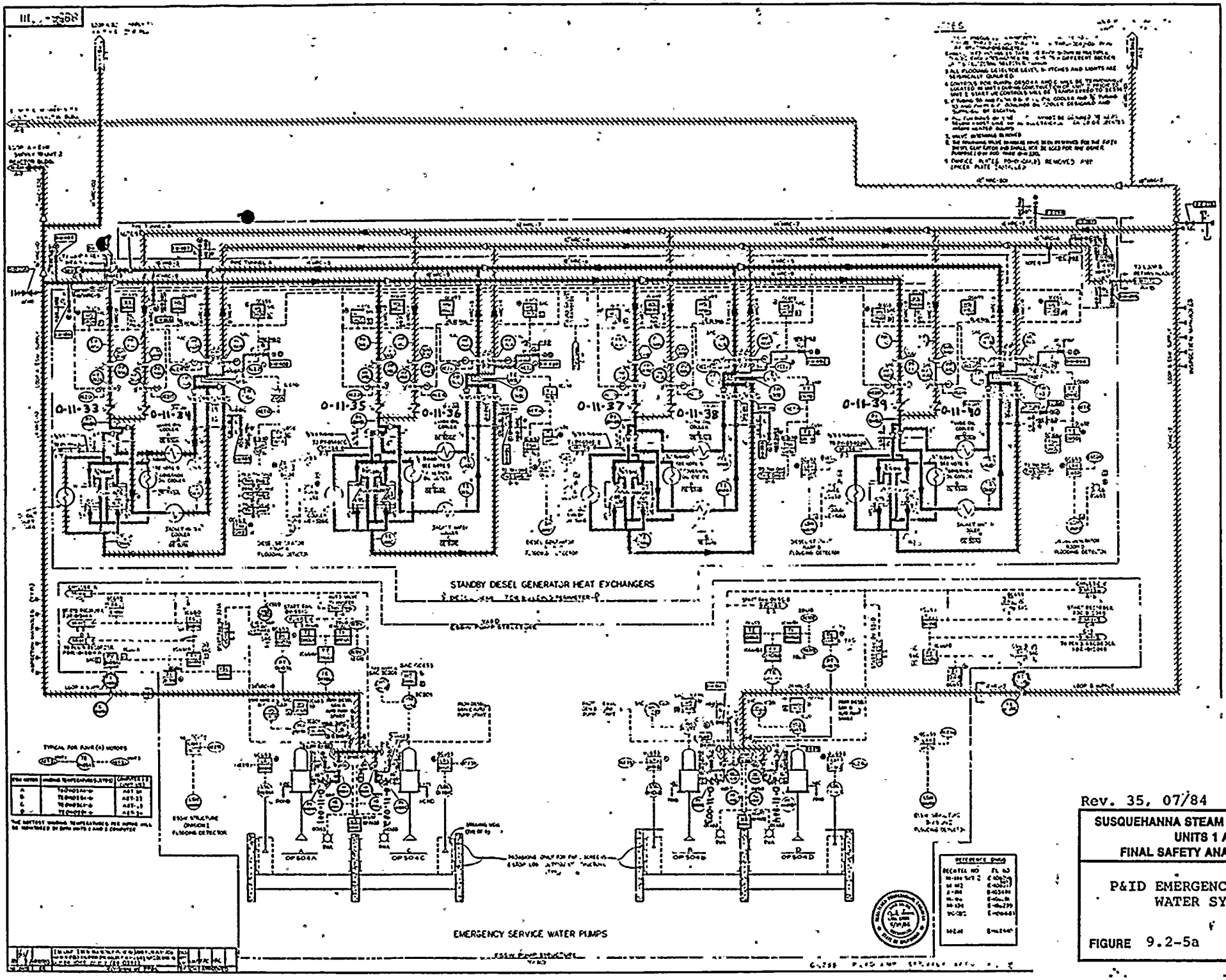
In conclusion, PP&L believes that the proposed alternative inspections provide an adequate indication of overall check valve integrity throughout the system and will not diminish our confidence in the ability of the ESW system to operate as required. An inspection of all the check valves as previously committed would pose an unjustified burden on PP&L since this could require a two unit outage.

Very truly yours,

for B. D. Kenyon
Vice President-Nuclear Operations

Attachment

cc: R. Jacobs - NRC Susq. SES

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**SUSQUEHANNA STEAM ELECTRIC STATION**
**UNITS 1 AND 2**
**FINAL SAFETY ANALYSIS REPORT**

P&ID EMERGENCY SERVICE WATER SYSTEM

FIGURE 9.2-5a