REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:8502050565 DOC.DATE: 85/02/01 NOTARIZED: NO DOCKET #
FACIL:50-387 Susquehanna Steam Electric Station, Unit 1, Pennsylva 05000387
50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylva 05000388
AUTH.NAME AUTHOR AFFILIATION
CURTIS,N.W. Pennsylvania Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
SCHWENCER,A. Licensing Branch 2

SUBJECT: Responds to plant-specific concerns re NRC position on NUREG-0803,Leak rates,loading conditions & matl properties for SDV piping sys bounded by limiting values identified by BWR Owners Group.

DISTRIBUTION CODE: A001D COPIES RECEIVED:LTR 1 ENCL 0 SIZE: 3
TITLE: OR Submittal: General Distribution

NOTES:1cy NMSS/FCAF/PM. LPDR 2cys Transcripts. 05000387
OL:07/17/82
1cy NMSS/FCAF/PM. LPDR 2cys Transcripts. 05000388
OL:03/23/84

	RECIPIENT ID CODE/NAME		COPIES LTTR	COPIES ENCL	RECIPIENT ID CODE/NAME		COPIES LTTR	COPIES ENCL
	NRR LB2 BC	01	7					
INTERNAL:	ACRS	09	6	6	ADM/LFMB		1	0
	ELD/HDS4		1	0	NRR/DE/MTEB		1	1
	NRR/DL DIR		1	1	NRR/DL/ORAB		1	0
	NRR/DL/TSRG		1	1	NRR/DSI/METB		1	1
	NRR/DSI/RAB		1	1	REG FILE	04	1	1
	RGN1		1	1				
EXTERNAL:	LPDR	03	2	2	NRC PDR	02	1	1
	NSIC	05	1	1				
NOTES:			3	3				

TOTAL NUMBER OF COPIES REQUIRED: LTTR 30 ENCL 27

PP&L Pennsylvania Power & Light Company
Two North Ninth Street • Allentown, PA 18101 • 215 / 770-5151

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

FEB 1 1985

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
NUREG 0803
ER 100450/100508 FILE 206 Docket Nos. 50-387
PLA-2402 50-388

Dear Mr. Schwencer:

The purpose of this letter is to respond to plant specific concerns for Susquehanna SES as they relate to the NRC's position on NUREG-0803.

Concern No. 1

PP&L is requested to provide written verification that the leak rates, loading conditions and material properties for the SDV piping systems at Susquehanna Units 1 and 2 are bounded by the limiting values for these parameters identified by the BWROG.

Response

The leak rates, loading conditions and material properties for the SDV piping systems at Susquehanna Units 1 and 2 are bounded by the limiting values for these properties identified by the BWROG.

Concern No. 2

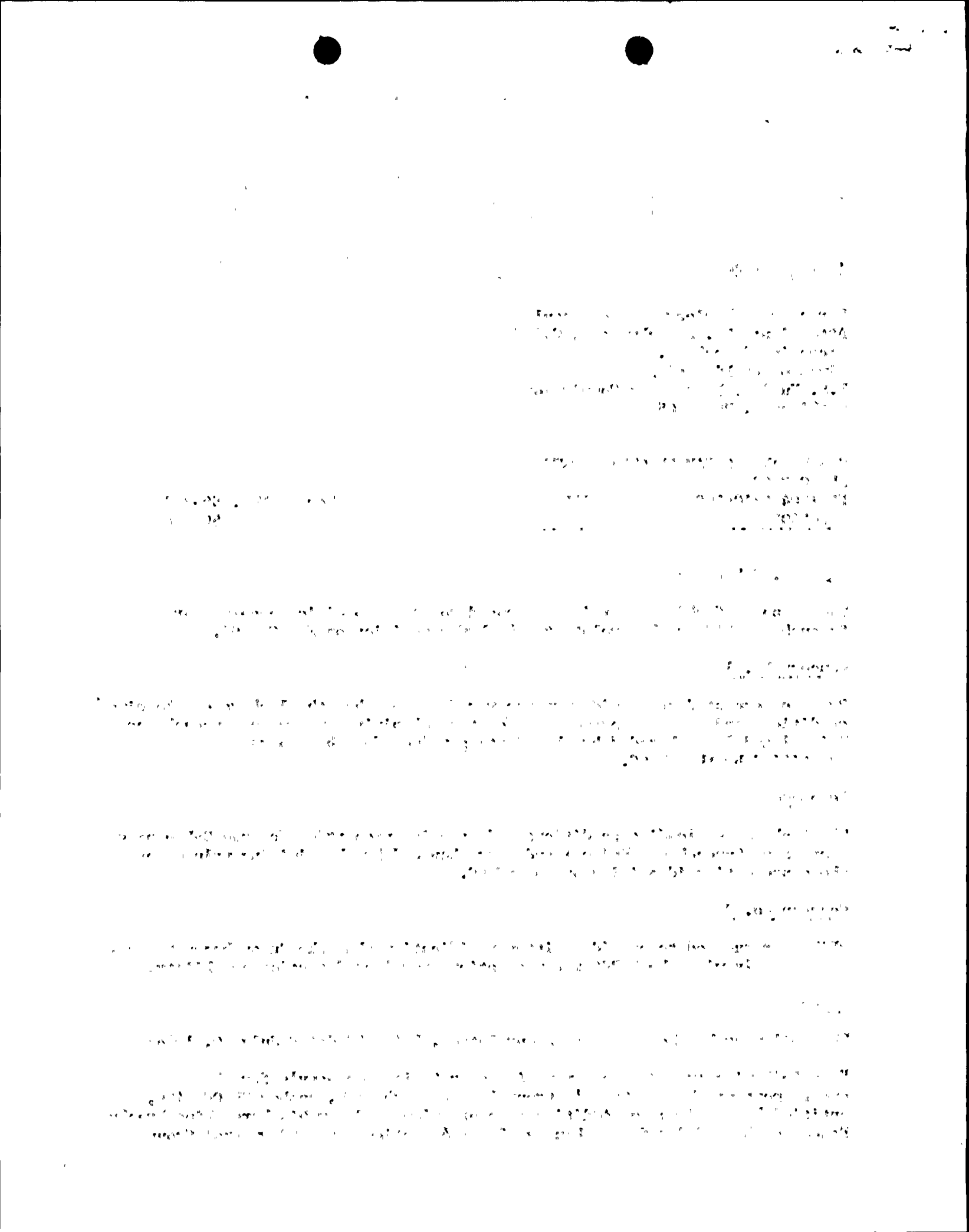
PP&L is requested to provide written verification that the Susquehanna Units 1 and 2 comply with the BWROG recommendations for leak detection capability.

Response

The following has been stated in our letter, PLA-2253 dated July 20, 1984:

"The following provides Pennsylvania Power & Light Company's formal endorsement of the BWR Owner's Group Letter to the NRC, number BWROG-8420, entitled "Transmittal of Additional Information on Scram Discharge Pipe Breaks Requested by NRC Staff at February 23, 1984 Meeting with BWR Owners' Group

A001
1/0



(BWROG)." As part of the endorsement of the BWROG position, the participating utilities are required to implement a generic program to perform a visual observation of the SDV piping to check for leaks at least once per refueling cycle. It was indicated to the BWROG, by the NRC staff, that if the utilities implemented this program it would not be necessary to satisfy the equipment qualification requirements of NUREG-0803.

PP&L presently performs a walkdown of the SDV in the post-scram condition on an 18-month frequency, as required by FSAR Section 18.1.69 (Integrity of Systems Outside Containment Likely to Contain Radioactive Material) and Technical Specification 6.8.4a (Primary Coolant Sources Outside Containment). This walkdown is of sufficient detail to detect appreciable leakage and it is our position that it meets intent of the program proposed by the NRC staff and the BWROG.

Based on the BWROG response with regard to leakage from the SDV and the above program for detection of such leakage, PP&L continues to maintain that equipment qualification for NUREG-0803 is not required."

Concern No. 3

PP&L is requested to provide written verification that Susquehanna Units 1 and 2 comply with the applicable generic secondary containment EPGs.

Response

At the present time, PP&L is in the process of revising our emergency operating procedures (EOPs) to reflect Revision 3 to the BWROG EPGs. Our existing EOPs are based upon an earlier revision of the BWROG EPGs.

Concern No. 4

PP&L is requested to provide written verification that the expected radiation fields and contact exposure levels at the SDV piping systems in Susquehanna Units 1 and 2 will not impair the performance of routine tests, inspections and post-scram reset walkdowns.

Response

The following has been stated in our letter, PLA-2010 dated January 27, 1984:

"The following provides Pennsylvania Power & Light Company's formal endorsement of the BWR Owner's Group "Response to NRC Request for Additional Information on Scram Discharge Piping." As noted in the BWR Owner's Group cover letter, the participating utilities are required to provide a discussion regarding the expected radiation field and contact exposure level at the scram system piping as it may affect routine tests and inspection.

Based on the limited operating experience which Susquehanna Unit 1 has to date, PP&L expects to see the following average dose levels for the SDV over the life of the plant:

- Average contact dose: 50-80 MR/HR
- Maximum contact dose: 300 MR/HR
- Average radiation field: 5 MR/HR"

Since Susquehanna SES Unit 1 and Unit 2 meet the Staff's position on equipment qualification as it relates to NUREG-0803, PP&L does not have to perform equipment qualification pursuant to Section 5.3 of NUREG-0803. Therefore License Condition 2.C.(18)(e) of Operating License NPF-14 has been met and should be closed.

If you have any questions, please contact us.

Very truly yours,

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

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