



Pennsylvania Power & Light Company

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

FEB 20 1985

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
REVISION AND ADDITIONAL INFORMATION
ON PROPOSED AMENDMENT 62
ER 100450 FILE 841-8
PLA-2415

Reference: Letter, PLA-2404, N. W. Curtis to A. Schwencer,
dated January 31, 1985.

Dear Mr. Schwencer:

The purpose of this letter is to correct an error in the referenced proposal as well as to provide additional information to support the No Significant Hazards Considerations conclusions.

Proposed footnote ** on Table 3.8.4.1-1 is requested to be deleted (the affected revised page is attached). This footnote does not currently exist in the Technical Specifications, and PP&L requests that no change be made to add this information at this time, since it would not be a proper reflection of the as-built design.

With respect to the No Significant Hazards information, your staff requested clarification of our position that certain changes to Table 3.8.4.1-1 were editorial in nature (see reference, page 5, item C.II). The changes in question remove technical information such as frame rating, trip setpoint, and response time information from the table for the reasons provided in the referenced letter.

No Significant Hazards Considerations

- I. The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

Although certain design information is proposed to be deleted from the Technical Specifications, appropriate safety controls are protected by the requirements of 10CFR50.59. Therefore, this change does not allow any changes to the limits imposed by previous accident evaluation; it merely provides the flexibility to move within the bounds of those evaluations without requiring changes to the Technical Specifications.

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- II. The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

Again, as long as our design process recognizes the restrictions of 10CFR50.59, no new evaluations are necessary to support the subject proposed changes.

- III. The proposed changes do not involve a significant reduction in a margin of safety.

PP&L recognizes that an administrative control that forces strict adherence to certain design information is being proposed to be removed. However, it is our position that these controls are an overzealous measure in that 10CFR50.59 already ensures adherence to the criteria needed to support our safety analyses. Furthermore, the subject administrative controls are impractical in that they provide no flexibility should a change be desired, without first going through the lengthy process of requesting a License change.

Should you have further questions on this information, please contact R. Sgarro at (215) 770-7855.

Very truly yours,



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

Attachment

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

T. M. Gerusky, Director
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