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RECIP.NAME RECIPIENT AFFILIATION
BUTLER,W.R. Licensing Branch 2

SUBJECT: Application for rev to proposed Amend 58 to Licenses NPF-14 & NPF-22,changing Tech Spec to revise testing requirements associated w/tie-in of fifth diesel generator.

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AUG 23 1985

Director of Nuclear Reactor Regulation
Attention: Dr. W. R. Butler, Chief
Licensing Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

SUSQUEHANNA STEAM ELECTRIC STATION
REVISION TO PROPOSED AMENDMENTS 58 TO
NPF-14 AND 13 TO NPF-22
ER 100450 FILE 841-8 Docket Nos. 50-387
PLA-2524 50-388

Reference: PLA-2346, N. W. Curtis to A. Schwencer, dated December 21, 1984

Dear Dr. Butler:

Via the referenced letter, PP&L proposed changes to the Susquehanna SES Units 1 and 2 Technical Specifications in order to allow work associated with the tie-in of a fifth diesel generator. Based on recent discussions with the NRC staff, we are now requesting a revision to the proposed testing requirements. A mark up of our revised proposal is attached.

In the referenced letter, ACTION a of the proposed footnote to Specification 3.8.1.1 required the performance of Surveillance Requirement 4.8.1.1.2.a.4 on the remaining A.C. sources within 24 hours <u>after</u> removing any diesel generator from service to perform subject work; this requirement would then be performed at least once per 72 hours thereafter.

It is now being proposed that Surveillance Requirement 4.8.1.1.2.a.4 be performed within 24 hours but <u>prior</u> to removing any diesel generator from service to perform tie-in work. As before, the requirement would then be performed at least once per 72 hours thereafter.

<u>No Significant Hazards Consideration</u>

1. This revision to the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated. Since the test is now being performed prior to removal of any diesel from service, there is greater assurance that the remaining diesels will be operable should they be called upon. The exposure to an unnecessary transient (i.e. forced shutdown) on both units is also reduced by this change. Therefore, the results of the original supporting analysis for this change can only be improved in terms of overall safety.

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2. This revision does not create the possibility of a new or different kind of accident from any accident previously evaluated. The original proposal required the identicial tests, just at a different time. As described in 1. above, the new timing has no adverse safety consequences. Therefore, the possibility of the creation of a new or different type of adverse situation cannot change from the original evaluation.

3. This revision does not involve a significant reduction in a margin of safety. As explained in 1. above, overall safety is improved due to this revision to the original proposal.

Any questions on this proposal should be directed to Mr. C. T. Coddington at (215) 770-7853.

Very truly yours,

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

Enclosures

cc: M. J. Campagnone USNRC
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