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

SUBJECT: Submits rewrite of NSHC into format,per request for addl. info re proposed Amends 58 & 13 to Licenses NPF-14 & NPF-22, respectively.Amends cover accident analysis re removing diesel generator from svc.

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SEP 04 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
RESPONSE FOR REQUEST FOR ADDITIONAL
INFORMATION ON PROPOSED AMENDMENT NO. 58
TO NPF-14 AND PROPOSED AMENDMENT NO. 13
TO NPF-22
ER 100450 FILE 841-8 Docket Nos. 50-387
PLA-2528 50-388

Dear Dr. Butler:

As requested by your staff, the following is a rewrite of the No Significant Hazards Consideration into the new format.

No Significant Hazards Consideration

1. This proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated. Since Susquehanna SES is designed to mitigate an accident using 3 out of the 4 diesel generators, the removing of one diesel generator from service does not change the accident analysis as presented in our FSAR. Also the work to be performed during the time the diesel generator is out of service only affects one diesel which is out of service. This work is a modification to the control and power circuitry to add transfer panels and bus bars.

2. This proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated. Since as stated in our FSAR the loss of one diesel generator is considered in the accident analysis, the work associated with this proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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3. This proposed change does not involve a significant reduction in a margin of safety. The impact of the extended Allowed Outage Time (AOT) on operating accident risk was evaluated with respect to inadequate core cooling (as a measure of core damage). This level of analysis was selected since it did not require reference to a full plant probabilistic risk assessment (PRA) and is a level at which the results can be viewed with a meaningful perspective. The availability of diesel generators only affects accident sequences which include a loss of offiste power (LOOP). These are typically low contributors to core damage frequency and public risk as illustrated through the risk achievement worth. Findings of the NRC Accident Sequence Precursor Program show the risk achievement worth is only 9.8×10^{-6} for emergency power as compared to 3.5×10^{-1} for long term core cooling. This means the diesel generators would have a relatively low risk importance. The results of our analysis show a negligible increase in the frequency of LOOP sequences which can lead to inadequate core cooling. Therefore, the overall impact on operating accident risk during the AOT is negligible. This negligible increase should be more than offset by the additional capability of the extra diesel generator over the plant lifetime. This diesel is expected to significantly reduce the number of shutdowns and startups of one unit primarily due to the performance of required maintenance (which takes more than three days) during refueling of the other units.

The above determination is based on the probabilistic evaluation as described in our letter dated 12/21/84. This proposed change is an example as provided in 48FR14780, Column 3, paragraph (vi).

Very truly yours,

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

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

[illegible]