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SUBJECT: Submits reformatted NSHC for proposed Amends 69 & 23 to Licenses NPF-14 & NPF-22,respectively.Tech Spec changes to add new motor-generated valves involve NSHC.

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SEP 13 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
PROPOSED AMENDMENTS NO. 69 TO NPF-14
AND NO. 23 TO NPF-22 FORMAT CHANGE
ER 100450 FILE 841-8 Docket Nos. 50-387
PLA-2538 50-388

Dear Dr. Butler:

As requested by your Staff, the following is the reformatted No Significant Hazards Consideration for proposed Amendments No. 69 to NPF-14 and No. 23 to NPF-22.

No Significant Hazards Consideration

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated. Neither the drain pumps nor the level detection system are safety related since these systems are used only to maintain the spray arrays in an operable condition. The drain valves provide a boundary between the ASME Section III RHRSW/ESW piping and the non-quality drain pumps and are safety related. The safety function of the drain valves is to close when the spray array isolation valves open and an interlock is provided that prevents the drain valves from opening unless the spray array isolation valves are 100% closed.

   The drain valves are designed to ASME Section III Class 2 and are Seismic Category I. The motor operators are Class 1E and are powered from existing Class 1E motor control centers. Since the level instrumentation system is non-Class 1E, proper separation between Class 1 E and non-Class 1E circuits is provided. Control circuits for the drain pump motors are affiliated and will remain so.

   A fire will not jeopardize the safe shutdown of the plant due to the installation of the automatic drain system. This modification was analyzed with respect to fire protection and was found to be consistent with the Fire Analysis for the plant.

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The proposed modification will allow automatic pumpdown of the spray arrays, thereby providing protection against freezing. This decreases the dependency on operators and thus contributes to safety. This modification does not jeopardize the capability of the spray arrays, Emergency Service Water or RHR Service Water to perform their safety functions. Therefore, this modificaiton will not increase the probability of occurrence or the consequences of an accident or malfunction of equipment related to safety as previously evaluated.

2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed action does not alter the function or operation of any safety related systems. This change does not compromise separation criteria nor does it allow a single failure to prevent any safety related systems from performing their safety functions. This design is consistent with the design philosophy as described in the FSAR and does not create a possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR.

3. The proposed change does not involve a significant reduction in a margin of safety, since this modification does not affect the ability of the Spray Pond, ESW or RHRSW to provide sufficient cooling nor does it affect the redundancy of these systems.

In conclusion, this change does not involve significant hazards consideration and meets the Commission's guidance concerning the application of the no significant hazards consideration standard examples (48 FR 14870). One of the examples of actions not likely to involve a significant hazards consideration, example (ii) involves a change that constitutes an additional limitation, restriction, or control not presently included in the Technical Specifications:

For example, a more stringent surveillance requirement. The propoesd technical specification changes fall within example (ii) of actions not likely to involve significant hazards considerations. These technical specification changes add new motor operated valves to Technical Specifications.

If you have any questions, please contact us.

Very truly yours,

H Keiser for

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

SEP 13 1985

SSES PLA-2538
ER 100450 File 841-8
Dr. W. R. Butler

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