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AUTH. NAME AUTHOR AFFILIATION
KEISER, H. W. Pennsylvania Power & Light Co.
RECIP. NAME RECIPIENT AFFILIATION
Office of Nuclear Reactor Regulation, Director (post 851125
ADENSAM, E. BWR Project Directorate 3

SUBJECT: Forwards application for proposed Amends 76 & 31 to Licenses NPF-14 & NPF-22, respectively, revising Tech Specs re containment instrument gas, HPCI, RCIC & integrated leak rate test. Fee paid.

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PP&L Pennsylvania Power & Light Company
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Harold W. Keiser
Vice President-Nuclear Operations
215/770-7502

DEC 26 1985

Director of Nuclear Reactor Regulation
Attention: Ms. E. Adensam, Project Director
BWR Project Directorate No. 3
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION
PROPOSED AMENDMENTS 76 TO NPF-14
AND 31 TO NPF-22
ER 100450 FILE 841-8 Docket Nos. 50-387
PLA-2576 50-388

Dear Ms. Adensam:

The purpose of this letter is to propose changes to the SSES Units 1 and 2 Technical Specifications which are administrative in nature. Each change is described below.

1. Corrections to Table 3.6.3-1 (Units 1 and 2)

A. Containment Instrument Gas

Unit 1: Page 3/4 6-25 of the Unit 1 Tech Specs currently lists valve number 1-26-070 as an isolation valve in the Containment Instrument Gas System. The proposed change deletes this valve from the table, and adds valve number 1-26-164.

The original design for the isolation valves on this one inch penetration (No. X-218) was to have a check valve (1-26-070) inside containment and a globe valve (SV-12671) outside containment. However, the check valve inside containment is subject to severe environmental conditions such as suppression pool dynamic loads. Therefore, a check valve (1-26-164) was added outside containment between the penetration and the globe valve.

Since this arrangement did not explicitly meet the requirements of General Design Criteria 56 of 10CFR50, Appendix A an exemption was requested from NRC. The NRC Safety Evaluation which formed the basis for your approval of the new valve arrangement is also attached.

It is noted that, although the 1-26-164 is not listed in the Unit 1 Tech Specs, it has been subjected to all surveillance testing as if it were in the table.

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Unit 2: Page 3/4 6-25 of the Unit 2 Tech Specs lists both the 2-26-164 valve and the 2-26-070 valve as Containment Instrument Gas System isolation valves. This is because the exemption request was sent in prior to receipt of the Unit 2 License, but NRC concurrence was not yet received. Listing both valves ensured both would be tested.

For the reasons described above under Unit 1, the 2-26-070 valve is proposed to be deleted.

B. HPCI

Unit 1: Page 3/4 6-26 lists HV-155F012 as a HPCI Minimum Recirculation Flow (penetration X-211) isolation valve. The proposed change adds HV-155F046 to this category.

The F046 valve was inadvertently omitted from the Tech Specs. It represents the outer isolation boundary on the X-211 penetration as documented in FSAR Table 6.2-22. Since this isolation arrangement represents a deviation from General Design Criteria 56 of 10CFR50 Appendix A, NRC approval was required. This is documented in NUREG 0776, page 6-33, attached. The F046 valve is included in the SSES Surveillance Program and has been properly leak tested.

Unit 2: Page 3/4 6-25; for the reasons above, HV-255F046 should be added to the Unit 2 Tech Specs under HPCI Minimum Recirculation Flow.

C. RCIC

Unit 1: Page 3/4 6-26 lists FV-149F019 as a RCIC Minimum Recirculation Flow (penetration X-216) isolation valve. The proposed change adds HV-149F021 to this category.

The F021 valve was inadvertently omitted from the Tech Specs. It represents the outer isolation boundary on the X-216 penetration as documented in FSAR Table 6.2-22. Since this isolation arrangement represents a deviation from GDC 56 of 10CFR50 Appendix A, NRC approval was required. This is documented in NUREG 0776, page 6-33, attached. The F021 valve is included in the SSES Surveillance Program and has been properly leak tested.

Unit 2: Page 3/4 6-26; for the reasons above, HV-249F021 should be added to the Unit 2 Tech Specs under RCIC Minimum Recirculation Flow.

D. ILRT

Unit 1: Page 3/4 6-24 contains a typographical error. Valve 1-57-195 should be valve 1-57-194.

This valve is properly identified in FSAR Table 6.2-22 (Penetration X-61A), and has been properly identified in all controlling procedures/documents.

The above discussion illustrates that several administrative problems have been identified and are being corrected on Table 3.6.3-1 of the Unit 1 and Unit 2 Technical Specifications. The only likely safety concern that could have existed due to these errors would be if the correct valves had not been covered by the appropriate plant procedures and other documents. This concern was thoroughly investigated and found to be of no adverse consequence. Therefore, in the interim until these corrections are made, no safety concern exists on these issues.

2. Addition to PORC Membership (Units 1 and 2)

It is proposed that the Assistant Superintendent-Outages be added to the PORC Composition listing in Section 6.5.1.2.

The Assistant Superintendent-Outages meets the qualifications requirements of Plant Manager under ANSI/ANS-3.1-1978, Paragraph 4.2.1 (Reference FSAR Subsection 13.1.3.1).

This expansion of PORC membership is intended to increase the experience/expertise base of the PORC. The addition of the Assistant Superintendent of Plant-Outages to the PORC membership list will vest in that position legal responsibilities to advise/recommend to the Superintendent on matters related to nuclear safety commensurate with those responsibilities inherent in managing nuclear power plant outage activities.

The qualification/education/training requirements for the Assistant Superintendent-Outages are the same as those for the 'operating' Assistant Superintendent, thus making the Assistant Superintendent-Outages qualified for management of operating nuclear power plant activities.

3. Deletion of Offsite Organization Position (Units 1 and 2)

The deletion of the position "Vice President-Engineering and Construction-Nuclear" and the subsequent realignment as indicated in the proposed change to Figure 6.2.1-1 reflects PP&L's shift from construction to operation of the Susquehanna plant.

The personnel requirements of ANSI/ANS 3.1-1978 do not apply to this change, since the scope of these guidelines does not rise above the functional level of "Manager". Based on the above, this change does not adversely affect the safe operation of Susquehanna SES.

4. Generic Letter No. 85-19 (Units 1 and 2)

Changes are attached for both units based on the recommendations of Generic Letter 85-19, "Reporting Requirements on Primary Coolant Iodine Spikes".

5. Snubbers (Unit 1 only)

Two changes are proposed to specification 3/4.7.4:

1) Deletion of references to Table 3.7.4-1.

Removal of the snubber table was approved by NRC via Amendment 36 to the Unit 1 Operating License. The references to it were inadvertently left in the text of Specification 3/4.7.4.

2) Correction of sampling expression.

The correct expression is 35 $(1 + \frac{C}{2})$. This typographical error was made in Amendment 36 to the Unit 1 operating license.

Based upon the demonstrated administrative nature of these changes, neither has any adverse impact on the safe operation of Susquehanna SES.

NO SIGNIFICANT HAZARDS CONSIDERATIONS

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

1A. Containment Instrument Gas: The subject penetrations (Unit 1 and Unit 2) are required to meet NRC approved provisions for containment isolation. The analysis of how Susquehanna complies with these provisions is provided in the FSAR. The proposed changes, as described above, are consistent with this analysis based on approved exemptions from 10CFR50 Appendix A, GDC56.

1B. HPCI: The Minimum Recirculation Flow penetrations have a configuration that represents a deviation from 10CFR80 Appendix A, GDC56. The subject outer isolation valves were approved as part of an exemptions request as documented in the FSAR. Therefore, addition of these valves to the respective U1 and U2 tables is consistent with prior analysis.

1C. RCIC: Same as HPCI justification above.

1D. ILRT: This change corrects a typo and is therefore totally administrative in nature.

2. Addition to PORC Membership: Changes in PORC membership are reviewed based on administrative requirements. They have no relationship to the accident analyses.

3. Deletion of Offsite Organization Position: Changes in organizational structure are reviewed based on administrative requirements. They have no relationship to the accident analyses.

4. Generic Letter No. 85-19: As described in the letter, the changes are mainly to reporting requirements, based on the changes to 10CFR50.72 and 73. This part of the change has no relationship to the accident analyses. With respect to the deletion of the shutdown requirement when specific activity limits are exceeded for 800 hours in a 12 month period, 10CFR50.72 as presently written will result in mitigating action much sooner should cladding failures occur. Therefore, based on the regulation changes, no adverse affect on the assumptions made in prior analyses with respect to monitoring fuel degradation will occur.

5. Snubbers: As described above, the changes to this specification involve an editorial change and the correction of a typo. These changes are therefore of no consequence to previous safety analyses.

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

For the reasons described above, each change was determined to be administrative in nature. Since they were all shown to be either corrections that were consistent with previously NRC approved analyses or corrections unrelated to safety analyses, no new concerns are generated due to the changes.

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

Changes 1A, B, and C were shown to be corrections which describe the basis for the as-built safety margin provided by the SSES Containment Isolation design. Therefore, these ensure the actual safety margin is maintained.

Changes 1D, 2, 3, and 5 are due to typos, editorial changes or changes in the organization; none of these types of administrative changes form the basis for the margin of safety inherent in the design of SSES.

Change 4 reflects changes in Federal Regulations which ensure certain reporting requirements are met and subsequent actions taken independent of Tech Specs. Since the control is simply moving from one document to another, both of which represent legal requirements, no loss in any safety margin is perceived.

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Any questions on this submittal should be directed to Mr. R. Sgarro at (215) 770-7855. Appropriate application fees are enclosed.

Very truly yours,

H. W. Keiser
Vice President-Nuclear Operations

Attachments

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

T. M. Gerusky, Director
Bureau of Radiation Protection
Pa. Dept. of Environmental Resources
P.O. Box 2063
Harrisburg, PA 17120