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ACCESSION NBR: 8604090246 DOC. DATE: 86/04/04 NOTARIZED: YES DOCKET #
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SUBJECT: Forwards application for Proposed Amend 35 to License NPF-22, changing Tech Specs to support mods to improve containment isolation function & testability of feedwater sys. Fee paid.

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

SUSQUEHANNA STEAM ELECTRIC STATION
PROPOSED AMENDMENT 35 TO LICENSE NO. NPF-22
PLA-2621 FILES A17-2, R41-2 Docket No. 50-388

Dear Ms. Adensam:

The purpose of this letter is to propose changes to the Susquehanna SES Unit 2 Technical Specifications. The proposed changes support modifications which improve the containment isolation function and the testability of the Feedwater system.

Attached to this letter are the proposed changes (which are described below) in marked-up form, and a single line diagram to enhance the discussion in this letter.

A. Table 3.6.3-1, "Primary Containment Isolation Valves"

The proposed change to this table replaces the two valves listed as the RWCU Return manual isolation valves with two new valves. The valves being replaced (HV-244F042 and HV-244F104) are not being removed from the plant, but they will no longer serve as containment isolation valves. These valves are a significant contributor to leakage during local penetration testing due to their other function, throttling in support of RWCU operation. The new valves (HV-24182 A&B) will take over the containment isolation function, and the other valves will continue to be used for throttling purposes.

B. Table 3.8.4.2-1, "Motor-Operated Valves Thermal Overload Protection"

The two new containment isolation valves, HV-24182 A&B, are being added to this table, because they are equipped with thermal overload bypass circuitry.

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NO SIGNIFICANT HAZARDS CONSIDERATIONS

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

FSAR Section 5.4.8.2 states that the RWCU System is classified as a primary Power Generation System and is not an Engineered Safety Feature. The FSAR describes the function of the HV-2F042 and HV-2F104 system return valves as long term leakage control. Instantaneous reverse flow isolation is provided by the G33-2F039A&B check valves, further downstream in the RWCU piping. This modification will reassign the long term leakage control function from valves HV-2F042 and HV-2F104 to the new valves HV-24182A&B. The location of the new valves will be downstream from the G33-2F039A&B check valves and will not alter their present function of instantaneous reverse flow isolation. The motor-operated HV-24182A&B isolation valves will function as positive-closing containment isolation valves for the RWCU branch connections to Feedwater penetrations X-9A and X-9B and will not increase the probability of an accident or malfunction of equipment related to safety.

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

FSAR Section 5.4.8.2 describes the safety-related portions of the RWCU System. This modification will improve RWCU capability to serve these safety-related functions by reducing containment valve leakage via new containment isolation valves HV-24182A&B. FSAR Section 6.2.4.3.2.1 identifies the safety-related function of the Feedwater containment isolation valves. This modification will not alter the present function of the Feedwater valves nor create a possibility for an accident or malfunction of a different type than already evaluated in the FSAR.

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

As noted above, the containment isolation for the affected feedwater penetrations will be improved by the addition of the new valves, because they will not be used for throttling purposes. Therefore the margin of safety defined by the containment isolation function is improved.

IMPLEMENTATION

The proposed changes support a modification currently scheduled for the Unit 2 first refueling and inspection outage. Therefore, we request that NRC approve this change prior to the start of that outage with the condition that it becomes effective upon startup following the outage.

Any questions on this proposal should be directed to Mr. R. Sgarro at (215) 770-7855. Pursuant to 10CFR170.22, the appropriate fee is enclosed.

Very truly yours,

H. W. Keiser
Vice President-Nuclear Operations

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

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