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 ADENSAM, E. BWR Project Directorate 3

SUBJECT: Forwards applications for proposed Amends 84 & 37 to Licenses NPF-14 & NPF-22 respectively, changing Tech Specs re definition of secondary containment as Zone III when Zone I isolated & reactor vessel cannot be drained. Fee paid.

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 DATE: 08/02/2009
 FROM: RTR Project Directorate
 SUBJECT: RTR Project Directorate

SUBJECT: Forwarded applications for proposed Amendment 84 & 85 to
 Licenses NRP-14 & NRP-22 respectively, including each space to
 definition of emergency containment as Zone III when Zone I
 isolated & reactor vessel cannot be drained for load.

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Pennsylvania Power & Light Company

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Harold W. Keiser
Vice President-Nuclear Operations
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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 AMENDMENTS 84 TO NPF-14
AND 37 TO NPF-22
PLA-2643

FILE R41-2

Docket Nos. 50-387
50-388

Dear Ms. Adensam:

The purpose of this letter is to request changes to the Susquehanna SES Unit 1 and Unit 2 Technical Specifications.

Problem Statement: The current restrictions on entry into Secondary Containment during a refueling outage hampers the work planning and implementation process.

Discussion: The Unit 1 Technical Specifications contain the following description of Secondary Containment in specification 3/4.6.5.1, footnote **:

"Secondary Containment consists of Zone I, Zone II and Zone III or Zone I and Zone III when Zone II is isolated from Zone I and Zone III."

Similarly, for Unit 2:

"Secondary Containment consists of Zone I, Zone II and Zone III or Zone II and Zone III when Zone I is isolated from Zone II and Zone III."

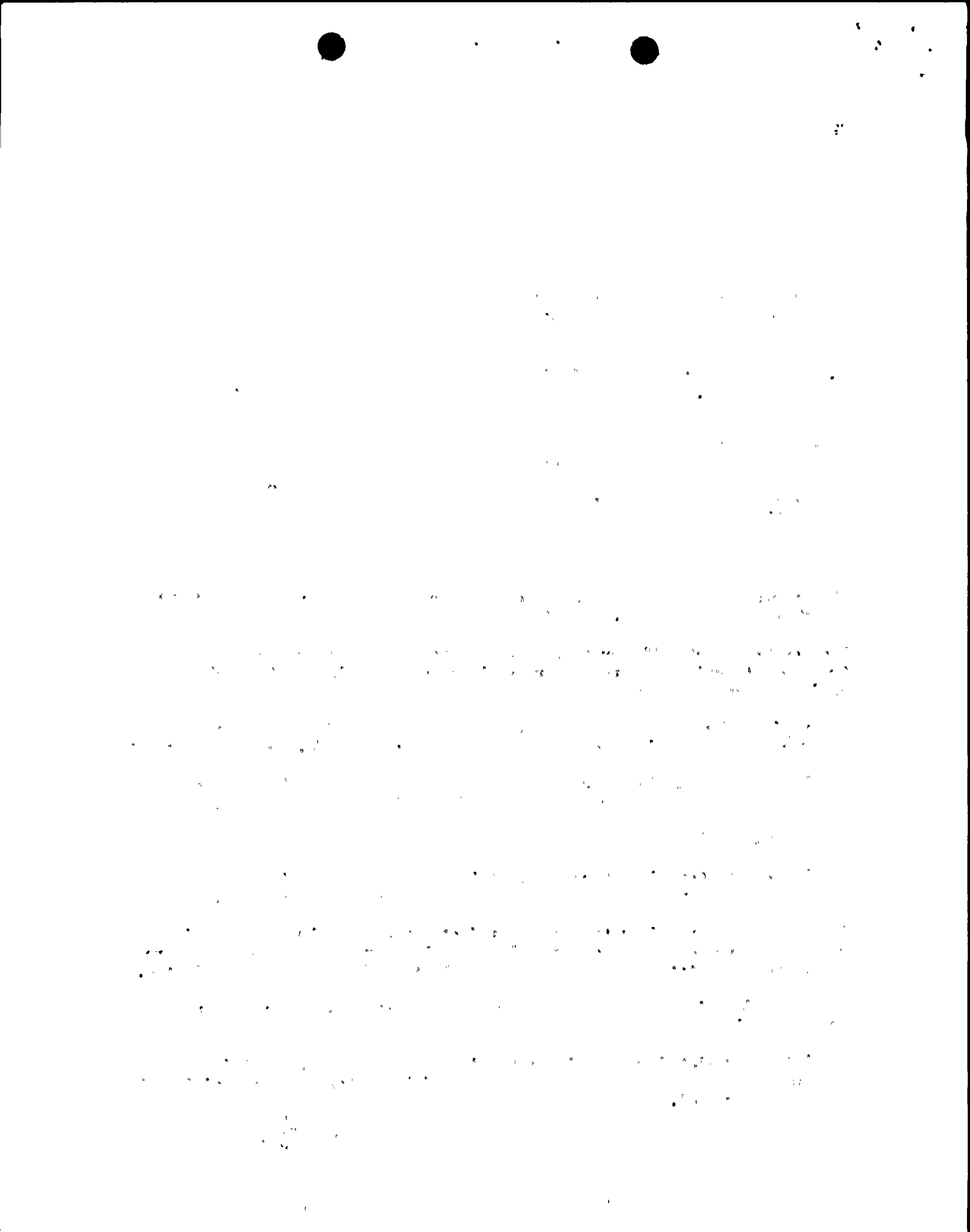
The attached figure illustrates the subject zones. The balance of this assessment applies specifically to Unit 1. Where references to Zone I are used, the same statements can be made for Unit 2 if Zone II is substituted.

The above description of Secondary Containment applies, for outage purposes, during condition "**":

"When irradiated fuel is being handled in the secondary containment and during CORE ALTERATIONS and operations with a potential for draining the reactor vessel."

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where CORE ALTERATIONS is defined as:

"the additional, removal, relocation or movement of fuel, sources, or reactivity controls within the reactor pressure vessel with the vessel head removed and fuel in the vessel. Normal movement of the SRMs, IRMs, TIPS or special moveable detectors is not considered a CORE ALTERATION. Suspension of CORE ALTERATIONS shall not preclude completion of the movement of a component to a safe conservative position."

A unit is in condition * for a substantial portion of a typical refueling and inspection outage. In order to perform work inside the Reactor Building and continue to maintain Secondary Containment Integrity, airlocks and administratively controlled doors and hatches are provided. These control points serve as effective obstacles to the potential for degrading Secondary Containment - and well they should, if the safety analysis warrants it in a given operational condition. However, if these control points are unnecessary, they become just as effective an obstacle to the efficient performance of work. Airlocks slow traffic under normal use; they slow it even more once enough equipment has been dragged through to damage the door seal and ingress and egress must wait for repairs to be completed.

Proposed Change: It is proposed that the Technical Specifications be changed to allow Secondary Containment to be optionally defined as Zone III when Zone I is isolated from Zone III, during condition * when operations with a potential for draining the reactor vessel (OPDRVs) are not being performed. At all other times, the affected unit must meet the existing requirements.

This means, that when Unit 1 is in condition * with no OPDRVs in progress, Unit 1 required Secondary Containment may consist of Zone III alone, while Unit 2, if operating, will be using Zones II and III to define its Secondary Containment.

Basis for Change: The purpose of Secondary Containment is to minimize the ground level release of airborne radioactivity and to provide for the controlled, filtered release of the Reactor Building atmosphere. During condition *, the source of the potential radioactivity (i.e., the fuel) is effectively contained within Zone III except where reactor coolant can leak through primary and into secondary containment. Currently, Zone I integrity is not required during Operational Conditions 4 and 5 unless condition * applies, and this is only due to the fact that OPDRVs (which have the potential to involve Zone I) are part of condition *. CORE ALTERATIONS and the handling of irradiated fuel in Secondary Containment are activities which are contained in Zone III. Therefore, if no OPDRVs are being performed, Zone I integrity is not necessary to protect against an airborne release; the radioactivity would be contained within Zone III.

Based on an in-depth study, PP&L has developed and implemented an administrative procedure which both identifies and provides necessary controls over OPDRVs. This control provides an extra level of assurance that the appropriate level of Secondary Containment will be a prerequisite to the performance of any OPDRV.



[The text in this section is extremely faint and illegible due to low contrast and noise. It appears to be a large block of text, possibly a list or a series of entries, but the individual characters and words cannot be discerned.]

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Conclusions: The proposed Tech Spec changes allow Zone I integrity to be eliminated as a prerequisite to entering condition * when OPDRVs are not being performed. This is safe because the fuel is contained in Zone III, which is required to be isolated from Zone I in the proposal. When OPDRVs are being performed, Secondary Containment must include Zone I.

NO SIGNIFICANT HAZARDS CONSIDERATIONS

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

The current Technical Specification requirements for Secondary Containment during Condition * reflect a need to maintain any radioactivity resulting from a refueling accident within Secondary Containment. Since the vessel head is removed, any source due to such an accident will emanate into Zone III if CORE ALTERATIONS are in progress. Similarly, any source due to mishandling of irradiated fuel in secondary containment will be contained in Zone III since all movements take place within that Zone. It is recognized that the reactor coolant activity will increase due to any fuel-handling accident, but as long as OPDRVs are not in progress, and the zone associated with the unit in refueling is isolated from Zone III, pathways to the environment will be limited to insignificant volumes of normal leakage through valve packing, etc.

Based on the above, the probability of previously-analyzed accidents are not changed due to the proposal, and the consequences of those accidents are not significantly increased.

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

No new or different kinds of accidents are created since the design of the plant remains unchanged. The proposal provides relaxation of an operational restriction which was shown not to be necessary to support the design basis. The purpose of Secondary Containment is to mitigate an accident should it occur; therefore altering its controls has the potential to affect accident consequences, not to create new accident scenarios. The consequences are analyzed in I above.

- III. The proposed change does not involve a significant reduction in a margin of safety.

As discussed in I above, the only leakage pathway out of Zone III due to a postulated fuel handling accident is via minor coolant leak paths that have no significant offsite consequences - the postulated accident occurs when the reactor is not pressurized and no pipe breaks are assumed. Therefore, reduction in margin of safety as defined by offsite dose consequences is qualitatively insignificant.

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Implementation: As discussed earlier, the proposed change will enhance the outage work process. Therefore, it is requested that NRC approve this change on or before our next refueling and inspection outage, which is scheduled to begin on August 2, 1986.

Any questions on this change should be directed to Mr. R. Sgarro at (215) 770-7855. Appropriate fees have been enclosed.

Very truly yours,



H. W. Keiser
Vice President-Nuclear Operations

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

T. M. Gerusky, Director
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