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 ADENSAM, E. BWR Project Directorate 3

SUBJECT: Forwards application for amends to Licenses NPF-14 & NPF-22,
 revising Tech Specs re diesel generator operability.

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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 DC 20555

SUSQUEHANNA STEAM ELECTRIC STATION
REVISIONS TO PROPOSED AMENDMENT 80 to NPF-14
AND AMENDMENT 33 TO NPF-22
FIFTH DIESEL GENERATOR TECHNICAL SPECIFICATION CHANGES
PLA-2730 FILES R41-2, A17-2, S100

Reference: PLA-2596 dated February 10, 1986
PLA-2706 dated August 29, 1986

Dear Ms. Adensam:

The referenced letters requested changes to Technical Specifications 3.3.7.9, 3.7.6.2, 3.7.6.5, 3.8.1.1, 3.8.1.2, 3.8.2.1, 3.8.2.2, 3.8.3.1, 3.8.3.2, 3.8.4.2 and 8-3/4.8. By this letter PP&L is proposing changes to Technical Specifications 3.8.1.1 and 3.8.4.2.2 which are a result of our meeting with you and your staff on September 10, 1986 and the need to clarify information in Tables 4.8.1.1.2-2 and 4.8.4.2.2.

The changes provided under this letter supersede our previous changes to these specifications submitted under the referenced letters. A description and justification for each change are provided below.

Specification 3.8.1.1

The footnote for this specification has been expanded to say an OPERABLE diesel generator may be removed from service for a period of eight hours when aligning diesel generator E to the Class 1E distribution system and if the substitution cannot be successfully completed in eight hours, an LCO must be declared and the appropriate ACTION(S) followed with the time requirements in the ACTION statement(s) being measured from the time alignment of diesel generator E began.

Safety is not compromised by this change. An OPERABLE diesel is being replaced by an OPERABLE diesel and the resulting level of degradation during the substitution process is minimal. Further, the available remaining 3 diesels satisfy the initial condition assumptions of the FSAR accident

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analyses of an assumed loss of offsite power and single failure of one other on site A.C. source. Under the footnote, testing the remaining 3 diesel generators is not required. This does not impact safety since the purpose of testing the remaining diesel generators is to detect any potential generic causes of failures and provide a high level of confidence that A.C. power will be available to supply the safety related equipment required for: 1) safe shutdown of the Plant and 2) the mitigation and control of accident conditions within the facility. Since a conscious decision was made to remove an OPERABLE diesel from service there is no reason to suspect any generic defects or that the reliability of the other 3 diesels is compromised.

Table 4.8.1.1.2-2

Table modified to incorporate actual timer settings and remove the associated footnotes(** and ***). These changes are administrative.

Table 3.8.4.2.2.-1

Table modified to reflect only the 'B' loop ESW valves. By design the 'B' loop is the only ESW loop available to diesel generator 'E' when it is not aligned to the Class 1E distribution system. There is no safety impact because one loop is all that is required for cooling diesel generator E and when diesel E is not aligned to the Class 1E distribution system it is not performing a safety function.

The proposed changes do not:

- I. Involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed changes support installation of a fifth diesel into the Susquehanna design. The loss of one diesel generator has been evaluated in Susquehanna Steam Electric Station Final Safety Analysis Report (FSAR) Section 8.3. The loss of one loop of Emergency Service Water (ESW) has also been evaluated in FSAR Section 9.5.
- II. The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated. The design and installation of diesel generator E is such that it will only affect existing systems, the loss of which has been evaluated in the FSAR.
- III. The proposed changes do not involve a significant reduction in the margin of safety. This additional diesel generator does not reduce the margin of safety and will likely increase the reliability of the diesel generators as a source of power.



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We request these Amendments be made effective on November 3, 1986.

If you have any questions, please contact D. J. Walters.

Very truly yours,



H. W. Keiser
Vice President - Nuclear Operations

DJW:krp

cc: M. J. Campagnone USNRC
L. R. Plisco USNRC