

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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 FACIL: 50-387 Susquehanna Steam Electric Station, Unit 1, Pennsylva 05000387
 50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylva 05000388

AUTH. NAME AUTHOR AFFILIATION
 KEISER, H. W. Pennsylvania Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 ADENSAM, E. BWR Project Directorate 3

SUBJECT: Forwards application for proposed Amends 86 & 42 to Licenses NPF-14 & NPF-22, respectively, providing action statement applicable to configurations of two inoperable channels of 4.16 Kv ESS bus undervoltage. Fee paid.

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NOTES: 1cy NMSS/FCAF/PM. LPDR 2cys Transcripts. 05000387
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MEMORANDUM FOR THE ATTORNEY GENERAL
SUBJECT: [Illegible]

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Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101 • 215 / 770-5151

Harold W. Keiser
Vice President-Nuclear Operations
215/770-7502

SEP 29 1986

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 NO. 86 TO LICENSE NPF-14
AND NO. 42 TO LICENSE NPF-22
PLA-2733 FILES A17-2,R41-2

Docket Nos. 50-387
and 50-388

Dear Ms. Adensam:

The purpose of this letter is to request changes to the 4.16 kv ESS Bus Undervoltage Technical Specifications for Susquehanna SES Units 1 and 2.

The first proposed change corrects an omission in the existing Specifications by providing an Action Statement applicable to the configurations of 2 inoperable channels of 4.16 kv ESS Bus Undervoltage (Degraded Voltage, <65%), and 2 inoperable channels of 4.16 kv ESS Bus Undervoltage (Degraded Voltage, <84%). Both undefined conditions occur during monthly channel functional testing due to a single test switch in the system design. (This switch bypasses all channels of <65% and <84% Degraded Voltage Protection without affecting the bus transfer scheme on <20% Loss of Voltage.) The lack of provision in Specification 3.3.3 for this configuration has caused PP&L to invoke Specification 3.0.3 on a monthly basis during required surveillance.

The second proposed change provides a 2 hour time window for monthly surveillance testing of the <65% and <84% Degraded Voltage Protection channels, during which instrumentation is inoperable but the LCO is not entered. The 4.16 kv ESS Bus Undervoltage (Loss of Voltage, <20%) Protection will still be available during the 2 hour window. Adequate Undervoltage Protection will be maintained, and performance of the surveillance does not degrade the ability of the subject ESS bus to swap power sources from primary to either secondary source or associated diesel generator on either a loss of primary offsite power or total loss of offsite power.

The addition of a 2 hour surveillance window will allow monthly channel functional testing in a manner consistent with testing of other ECCS Actuation Instrumentation during which the trip function is not degraded and the trip initiating parameter is still being monitored.

The proposed changes (attached in marked-up form) are as follows:

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A. Table 3.3.3-1, ACTION 36

The existing ACTION 36 has become ACTION 36 a). ACTION 36 b) has been added, which states: "With both channels inoperable, declare the associated 4.16 kv ESS bus inoperable, and take the ACTION required by Specification 3.8.3.1 or 3.8.3.2 as appropriate."

B. Table 3.3.3-1, Items 5.b and 5.c

Note (g) has been added to two items in Table 3.3.3-1: Item 5.b, 4.16 kv ESS Bus Undervoltage (Degraded Voltage, <65%), and Item 5.c, 4.16 kv ESS Bus Undervoltage (Degraded Voltage, <84%). Note (g) states that "All channels of Degraded Voltage Protection (both <65% and <84%) for a single bus may be placed in an inoperable status for up to 2 hours for required surveillance testing provided that Loss of Voltage Protection (<20%) is OPERABLE (Table 3.3.3-1, Item 5.a)."

NO SIGNIFICANT HAZARDS CONSIDERATIONS

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

A. No FSAR accident analysis takes credit for operation of the <65% and <84% Degraded Voltage Protection devices. Additionally, application of the proposed ACTION 36 b) will not change the Degraded Voltage Protection instrumentation design, operation, or surveillance methods.

The proposed change defines the appropriate Action Statement for both channels per bus of <65% and <84% Degraded Voltage Protection in an inoperable status. The worst possible consequence of the unavailability of Degraded Voltage Protection for a single Class IE 4.16 kv ESS bus is the inability of loads to perform their design function during a degraded voltage condition. This scenario is no worse than and is bounded by the loss of a single 4.16 kv ESS bus. The Class IE onsite distribution system is single failure proof in accordance with IEEE 379-1972. Per FSAR Subsection 8.1.5.1.f, "minimum engineered safety feature loads required to shut down the unit safely and maintain it in a safe shutdown condition are met by any three of the four load group channels." Loss of a single 4.16 kv ESS bus is thus a previously evaluated event; it is also bounded by the loss of a single diesel generator. Therefore, inoperability of all channels of Degraded Voltage Protection for a single bus is not an unanalyzed event.

The proposed Action Statement is appropriate and conservative since it addresses the condition of both channels per bus of Degraded Voltage Protection (<65% or <84%) inoperable in the same manner as the loss of a single 4.16 kv ESS bus is addressed in Specifications 3.8.3.1 and 3.8.3.2. The addition of an applicable Action Statement

MEMORANDUM FOR THE DIRECTOR

Reference is made to the report of the Special Agent in Charge, New York, dated 1/15/54, and the report of the Special Agent in Charge, New York, dated 1/22/54, both captioned as above.

RE: [Illegible]

The above-captioned matter was discussed at the meeting of the Security Council on 1/22/54. It was noted that the information received from the New York Office is of a nature which would be of interest to the Security Council.

RECOMMENDATION

It is recommended that the information be disseminated to the Security Council.

The information is being disseminated to the Security Council through the appropriate channels.

The information is being disseminated to the Security Council through the appropriate channels. It is noted that the information is of a nature which would be of interest to the Security Council.

The information is being disseminated to the Security Council through the appropriate channels. It is noted that the information is of a nature which would be of interest to the Security Council.

does not change the 4.16 kv system design or operation and so does not increase the probability or consequences of an accident previously evaluated.

- B. The proposed Table 3.3.3-1 note (g) permits all <65% and <84% channels per bus of Degraded Voltage Protection to be inoperable for surveillance testing for up to 2 hours without declaring an LCO (provided <20% Loss of Voltage Protection is operable). Inoperability of all channels of Degraded Voltage Protection is bounded by the loss of a single 4.16 kv ESS bus. Specification 3.8.3.1 allows a single ESS bus to be inoperable for up to 8 hours before being required to be in at least HOT SHUTDOWN within the next 12 hours. Thus, the potential consequences of the proposed 2 hour surveillance window are bounded by the loss of a single 4.16 kv ESS bus. In addition, grid voltage is still monitored by the <20% Loss of Voltage device; therefore, protection is still provided during the proposed surveillance window, and the ability to transfer ESS bus power sources on loss of voltage is not degraded by surveillance testing. Also, no FSAR accident analysis takes credit for operation of the <65% and <84% Degraded Voltage Protection devices. Thus, the addition of a 2 hour surveillance window does not involve an increase in the probability or consequences of an accident previously evaluated.

Examples of Specifications which already allow instrumentation to be out of service for surveillance testing are as follows: Table 3.3.2-1, "Isolation Actuation Instrumentation," note (b), Table 3.3.3-1, "Emergency Core Cooling System Actuation Instrumentation," notes (a) and (f), and Table 3.3.4-1, "End-of-Cycle Recirculation Pump Trip System Instrumentation," note (a). These Specifications permit instrumentation to be placed in an inoperable status for up to 2 hours for required surveillance. The proposed Table 3.3.3-1 note (g) permits all channels per bus of Degraded Voltage Protection to be inoperable at the same time (this is necessary because, in testing, all channels per bus are simultaneously removed from service with a single test switch).

- II. The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.
- A. This proposed change defines the appropriate Action Statement for both channels of Degraded Voltage Protection inoperable. Since the 4.16 kv system design and operation remain unchanged, the proposed ACTION 36 b) does not create the possibility of a new or different kind of accident from any accident previously evaluated (i.e., loss of <65% and <84% Degraded Voltage Protection is bounded by the loss of one ESS bus).
- B. The addition of the 2 hour surveillance window does not affect the system design or operation. Therefore, this addition does not create

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the possibility of a new or different kind of accident from any accident previously evaluated.

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

- A. This change corrects an omission in the existing Specification by providing an appropriate Action Statement for both channels per bus of Degraded Voltage Protection (<65% or <84%) inoperable. The margin of safety is defined in the basis for this Specification, and is maintained through conformance with the appropriate Action Statement. The margin of safety is therefore not reduced by the addition of ACTION 36 b).
- B. The proposed 2 hour surveillance window does not affect the system design or operation, and does not involve any change in monthly surveillance practices. The margin of safety is therefore not reduced.

The omission in Technical Specification 3.3.3 will continue to cause PP&L to invoke Specification 3.0.3 on a monthly basis. Pursuant to 10CFR70.73(c)(2)(i), Licensee Event Reports have been and will continue to be submitted until an explicit Action Statement is added to the Specification. We therefore request approval of these changes by February 2, 1987.

Requests for additional information may be directed to Mr. L. Olson (215) 770-7859. Pursuant to 10CFR170.21, the appropriate fee is enclosed.

Very truly yours,



H. W. Keiser
Vice President-Nuclear Operations

Attachments

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

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

100-100000-100000

TO THE DIRECTOR, FBI
FROM THE SAC, NEW YORK

RE: [Illegible]

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Very truly yours,
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