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ADENSAM, E. BWR Project Directorate 3

SUBJECT: Application for amend to License NPF-14, revising Tech Specs to delete mechanical snubber functional test acceptance criterion on 50% increase in drag force. Fee paid.

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APR 08 1987

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

SUSQUEHANNA STEAM ELECTRIC STATION
PROPOSED AMENDMENT 91 TO LICENSE NO. NPF-14
PLA-2834 FILES A17-2, R41-2 Docket No. 50-387

Dear Ms. Adensam:

The purpose of this letter is to propose a change to the Susquehanna SES Unit 1 Technical Specifications. The change, attached to this letter in marked-up form, would delete the mechanical snubber functional test acceptance criterion on 50% increase in drag force.

BACKGROUND

Several acceptance criteria are provided in the Technical Specifications for the functional testing of snubbers. If any one of these criterion are not met, additional snubber testing is required. This is appropriate unless the criterion provides no useful information with regard to ensuring snubber reliability. The justification below provides several reasons why the criterion that "drag force shall not have increased more than 50% since the last surveillance test" should be deleted.

JUSTIFICATION

To the best of our knowledge, the subject criterion was initially provided in order to trend drag force data in hopes of predicting snubber failure. In fact, insufficient actual and laboratory test data exists to link increasing drag force with imminent snubber failure. Furthermore, the vendor (Pacific Scientific) believes that, based on laboratory test data, increasing drag force values do not indicate imminent snubber failure.

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We further believe that the scatter associated with acceptable drag values is sufficiently large to make a 50% increase in drag insignificant. For example, at Susquehanna the acceptable limit on drag force is 5 pounds for a size 1/4 snubber. This means that one snubber can be shipped from the manufacturer with a drag value of 1 pound while a second can be shipped with a value of 5 pounds. A scatter of 500% exists, yet both of the snubbers are acceptable. Imposing a 50% increase limit as a criterion for failure is inappropriate with such a large possible range of scatter.

Finally, as indicated by the Susquehanna Unit 2 Technical Specifications and other approved Technical Specifications on other dockets, the NRC is no longer requiring that this criterion be met. The SSES Unit 2 Technical Specifications were issued without this requirement.

NO SIGNIFICANT HAZARDS CONSIDERATIONS

The proposed change does not:

(1) Involve a significant increase in the probability or consequences of an accident previously evaluated.

For this change to impact a previously evaluated accident, the reliability of snubbers performing their function of supporting the structural integrity of safety-related systems would have to be brought into question. Since no information exists that indicates the subject criterion serves an integral function in ensuring snubber reliability, no concern relative to the probability or consequences of a previously evaluated accident exists.

(2) Create the possibility of a new or different kind of accident from any accident previously evaluated.

This change involves the reliability of existing components; it does not introduce any design or operational changes and therefore cannot create any new event requiring evaluation.

(3) Involve a significant reduction in a margin of safety.

Based on the range of scatter allowed for acceptable snubber drag characteristics, vendor recommendations, and NRC precedent, the subject criterion plays no significant role in ensuring the reliability of safety-related snubbers. Therefore, deleting the criterion has no adverse impact on safety margin.

IMPLEMENTATION

As stated in the BACKGROUND section, this criterion has the potential to increase required testing of snubbers. The next time that we believe this potential could affect Susquehanna is during the Unit 1 third refueling and inspection outage, which is currently scheduled to begin on September 5, 1987. Accordingly, we request that the NRC approve this change prior to that date.

Pursuant to 10CFR170, the appropriate application fee is enclosed. Any questions on this proposal should be directed to Mr. R. Sgarro at (215) 770-7916.

Very truly yours,

J. T. Kauffman

J. T. Kauffman
Executive Vice President-Operations

Enclosure

cc: NRC Document Control Desk (original)
NRC Region I
Mr. L. R. Plisco - NRC Resident Inspector
Mr. M. C. Thadani - NRC Project Manager
Mr. T. M. Gerusky - Pa DER

BEFORE THE
UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of :

PENNSYLVANIA POWER & LIGHT COMPANY : Docket No. 50-387

PROPOSED AMENDMENT NO. 91

FACILITY OPERATING LICENSE NO. NPF-14

SUSQUEHANNA STEAM ELECTRIC STATION
UNIT NO. 1

Licensee, Pennsylvania Power & Light Company, hereby files proposed Amendment No. 91 to its Facility Operating License No. NPF-14 dated July 17, 1982.

This amendment contains a revision to the Susquehanna SES Unit 1 Technical Specifications.

PENNSYLVANIA POWER & LIGHT COMPANY
BY:

J. T. Kauffman
Executive Vice President-Operations

Sworn to and subscribed before me
this 7th of April, 1987.

Martha C. Barto
Notary Public

MARTHA C. BARTO, NOTARY PUBLIC
ALLENTOWN, LEHIGH COUNTY
MY COMMISSION EXPIRES JAN. 15, 1990
Member, Pennsylvania Association of Notaries

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