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BUTLER, W. R. Project Directorate I-2

SUBJECT: Forwards application for amends to Licenses NPF-14 & NPF-22, changing surveillance requirements for standby gas treatment sys exhaust radiation high isolation instrumentation consistent w/applicability requirements. Fee paid.

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APR 13 1987

Director of Nuclear Reactor Regulation
Attention: Dr. W. R. Butler, Project Director
Project Directorate I-2
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
Washington, D.C. 205555

SUSQUEHANNA STEAM ELECTRIC STATION
PROPOSED AMENDMENTS 93 TO NPF-14 AND
46 TO NPF-22
PLA-2836 FILES A17-2, R41-2

Docket Nos. 50-387
and 50-388

Dear Dr. Butler:

The purpose of this letter is to propose a change to the Susquehanna SES Units 1 and 2 Technical Specifications. The nature of the change is to make the surveillance requirements for the Standby Gas Treatment System (SGTS) Exhaust Radiation-High isolation instrumentation consistent with its applicability requirements. A marked-up version of the proposal is attached.

BACKGROUND

Technical Specification Table 3.3.2-1, Isolation Actuation Instrumentation, modifies the applicability requirements for Operational Conditions 4 and 5 such that the SGTS Exhaust Radiation-High instrumentation needs to be operable only "when venting or purging the drywell per Specification 3.11.2.8." Table 4.3.2.1-1, Isolation Actuation Instrumentation Surveillance Requirements, currently requires valid surveillances prior to entry into Operational Condition 4 or 5 regardless of whether venting or purging is planned. The proposed changes would provide a footnote in the surveillance table consistent with the operability requirements for the instrumentation.

JUSTIFICATION

The sole safety function of the SGTS Exhaust Radiation-High isolation instrumentation in Operational Conditions 4 and 5 is to isolate the containment purge and nitrogen makeup valves (see attached figure) upon sensing high radiation at the SGTS exhaust vent during venting or purging operations. The proposed change eliminates the need to perform surveillance testing on these channels in order to enter Operational Conditions 4 and 5 but maintains the requirement that valid surveillances be recorded prior to

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venting or purging. Therefore, this change removes an overly conservative restriction in the Technical Specifications and maintains the current level of assurance with respect to the reliability of the safety function. Furthermore, due to the existence of the footnotes on the "Applicable Operational Condition" column of Table 3.3.2-1., it is believed that the proposed change represents correction of an editorial oversight.

NO SIGNIFICANT HAZARDS CONSIDERATIONS

The proposed change does not:

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

The safety function of the subject instrumentation during Operational Conditions 4 and 5 is to isolate the containment purge and nitrogen makeup valves upon sensing a predetermined radiation level at the SGTS exhaust vent during venting or purging operations. The subject change will ensure that the instrumentation will have valid surveillances on record prior to performing venting or purging, thereby ensuring a high reliability of the isolation function. It is unnecessary to require surveillance requirements to be met when the instrumentation is not required to be operable. Since the proposal is not affecting the reliability of the safety function but is simply deleting an unnecessary restriction, no previous accident evaluation is impacted.

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

Since no changes to the design or operation of the subject instrumentation is proposed, no new event requiring evaluation is required.

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

As explained in (1) above, the period of operation when the safety function of the instrumentation is required is unaffected by the proposed change; therefore safety margin is not impacted.

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

Very truly yours,

B. D. Kenyon
Senior Vice President - Nuclear

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