



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 67 TO FACILITY OPERATING LICENSE NO. NPF-14

PENNSYLVANIA POWER & LIGHT COMPANY

ALLEGHENY ELECTRIC COOPERATIVE, INC.

DOCKET NO. 50-387

SUSQUEHANNA STEAM ELECTRIC STATION, UNIT 1

1.0 INTRODUCTION

Pennsylvania Power & Light Company (PP&L) by letter dated April 8, 1987, submitted a proposed change to the Susquehanna Steam Electric Station Unit 1 snubber Technical Specifications (TSs). The requested change removes from the TS the mechanical snubber functional test acceptance criterion that, "Drag force shall not have increased by more than 50% since the last surveillance test."

The licensee operates two adjacent nuclear plants, Susquehanna Steam Electric Station Units 1 and 2. The licensee has requested to modify the snubber TS drag force acceptance criterion of Unit 1 to be more consistent with Unit 2, one of the more recently licensed plants. The TS for Unit 2 snubbers reflect the NRC reassessment of the snubber testing requirements as a result of accumulation of experience with snubber testing at older plants.

2.0 EVALUATION

The staff has evaluated the licensee's proposed change to remove the snubber functional test criterion in TS paragraph 4.7.4.D.1 that, "Drag force shall not have increased more than 50% since the last surveillance test." The staff's review included consideration of pertinent snubber testing documents including:

- NRC Snubber TS Generic Letter of November 20, 1980;
- NRC Snubber TS Generic Letter 84-13, of May 3, 1984;
- Snubber TS of recently licensed NTOLs (Hope Creek, Limerick 1, Susquehanna 2, Millstone 3);
- Pacific Scientific (PSA) mechanical shock arrestor catalog PSA-4;
- PSA Inspection Test Report explanation dated February 1982;
- PSA Acceptance Test Report I.T. 519 of May 2, 1974 for PSA-1 shock arrestor;
- PSA Standard Design Specification Report DR 1319 of April 17, 1975;
- Licensee's Specification M1090, Inservice Testing of Mechanical Snubbers;
- Licensee's Procedure SM-100-004, Mechanical Snubbers Functional Testing (Unit 1); and
- Licensee's Procedure SM-200-002, Mechanical Snubber Functional Testing (Unit 2).

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While the staff believes that increased drag force could indicate degradation of a snubber, the staff also agrees that the 50% increase in drag force is an inappropriate test failure criterion. A snubber with a very low initial drag force could be categorized as non-functional based on a 50% increase in drag force even though the magnitude of the measured drag force is well within acceptable values. Thus, a snubber could be declared inoperable with a small drag force that has no detrimental effect on the system or equipment to which it is attached. The licensee's revised test procedure contains a quantitative maximum drag force limit for each size snubber. This is a more suitable method to assess drag force acceptability.

Additionally, both Unit 1 and Unit 2 would have a common specification for Inservice Testing of Mechanical Snubbers, M1090, that contains specific breakaway and running drag testing requirements and acceptance criteria. The use of a common specification will aid in preventing the inadvertent testing errors that can occur with separate specifications.

Based on the foregoing evaluation, the staff finds the licensee's proposed amendment request to be consistent with the staff position to delete the 50% increase in drag force requirement from the snubber TS paragraph 4.7.4.D.1 to be acceptable. Deletion of the 50% drag force requirement is also consistent with the staff position taken on the more recently licensed plants.

### 3.0 ENVIRONMENTAL CONSIDERATION

This amendment involves a change to a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes to the surveillance requirements. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement nor environmental assessment need be prepared in connection with the issuance of this amendment.

### 4.0 CONCLUSION

The Commission made a proposed determination that the amendment involves no significant hazards consideration which was published in the Federal Register (52 FR 20804) on June 3, 1987 and consulted with the State of Pennsylvania. No public comments were received, and the State of Pennsylvania did not have any comments.

The staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security nor to the health and safety of the public.

Principal Contributor: H. Gregg

Dated: August 17, 1987

