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RECIP. NAME RECIPIENT AFFILIATION
BUTLER, W. R. Project Directorate I-2

SUBJECT: Application for amend to License NPF-14, requesting emergency, temporary relief from Tech Spec 3.0.4 on one time basis. Amend would avoid 3-day delay of plant entry into Operational Condition 5.

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SEP 14 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. 20555

SUSQUEHANNA STEAM ELECTRIC STATION
PROPOSED AMENDMENT 102 TO LICENSE NO.
NPF-14 (EMERGENCY REQUEST)
PLA-2916 FILE R41-2 Docket No. 50-387

Dear Dr. Butler:

This letter is an emergency request for NRC approval of temporary relief from the Susquehanna SES Unit 1 Technical Specifications. The requested change, attached in marked-up form, proposes that an exemption from the provisions of Specification 3.0.4 be added to Specification 3.3.6, Action a, on a one time basis.

BACKGROUND

Susquehanna Unit 1, currently in its third refueling and inspection outage, is in Operational Condition 4. One division of the 24 VDC batteries has been rendered inoperable by the performance of the required 60 month performance discharge test. This in turn has rendered the associated Intermediate Range Monitors (IRMs) that are required by Table 3.3.6-1, "Control Rod Block Instrumentation" inoperable such that entry into Operational Condition 5 is precluded due to Specification 3.0.4, which states:

> "Entry into an OPERATIONAL CONDITION or other specified condition shall not be made unless the conditions for the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION requirements."

In order to enter Operational Condition 5, reliance on Table 3.3.6-1, Action 61 is necessary to avoid delaying the outage until the batteries are sufficiently recharged to declare them operable.

JUSTIFICATION FOR PROPOSED CHANGE

NRC Generic Letter 87-09 states in part:

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"The first problem involves unnecessary restrictions on mode changes by Specification 3.0.4 and inconsistent application of exceptions to it."

"With respect to unnecessary restrictions on mode changes, Specification 3.0.4 unduly restricts facility operation when conformance with Action Requirements provides an acceptable level of safety for continued operation. For an LCO that has Action Requirements permitting continued operation for an unlimited period of time, entry into an operational mode or other specified condition of operation should be permitted in accordance with the Action Requirements. The solution also resolves the problem of inconsistent application of exceptions to Specification 3.0.4: (a) which delays startup under conditions in which conformance to the Action Requirements establishes an acceptable level of safety for unlimited continued operation of the facility; and (b) which delays a return to power operation when the facility is required to be in a lower mode of operation as a consequence of other Action Requirements."

The problem facing SSES Unit 1 at this time is a perfect example of the inconsistent application of and undue restrictions caused by Specification 3.0.4. The IRMs are also required to be operable by Table 3.3.1-1, "Reactor Protection System Instrumentation", but an exception to 3.0.4 is provided, given that the affected trip system is placed in the tripped condition. Table 3.3.6-1 also "establishes an acceptable level of safety for unlimited continued operation" by requiring at least one inoperable channel to be tripped, thereby enforcing a Rod Block, but does not provide an exception to 3.0.4.

Based on the above, the proposed change establishes an acceptable level of safety for entry into Operational Condition 5.

NO SIGNIFICANT HAZARDS EVALUATION

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

The proposed change allows SSES Unit 1 to follow a currently prescribed action statement upon entering Operational Condition 5. Inserting a control rod block by tripping one of the inoperable IRM channels is the prescribed action, and taking this action upon entry as opposed to having already been in Operational Condition 5 does not effect the probability or consequences of any accident previously analyzed for the condition. This logic has been endorsed by the NRC via Generic Letter 87-09.

II. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Operational Condition 5 is allowed to be entered with the required IRMs operable to perform their rod block function. Since upon entry into Operational Condition 5 the rod block will be inserted via manually tripping the channel, no circumstances exist that could not have occurred previously, and therefore no condition will exist that would create the possibility of a new or different kind of accident.

NO SIGNIFICANT HAZARDS EVALUATION

III. The proposed change does not involve a significant reduction in a margin of safety.

The answers expressed in I and II above indicate the insignificance of the role that the operational condition change plays in terms of safety for this case. The margin of safety has not been significantly reduced by manually inserting a rod block upon entry into Operational Condition 5 as opposed to entering Operational Condition 5 with operable IRMs which could automatically provide the rod block. In fact, the proposed condition is safer since the automatic function will not be relied upon.

BASIS FOR EMERGENCY REQUEST

10CFR50.91 provides guidance on what information the NRC requires in support of an application for an emergency change.

First, it requires the applicant to justify that an emergency exists, i.e., . . . failure to act in a timely way would result in derating or shutdown of a nuclear power plant . . . ". Unit 1 is currently ready to enter Operational Condition 5. It is conservatively projected that sufficiently charged 24 VDC batteries will not be available until September 17, 1987. This means that without the proposed change, startup of Unit 1 will be delayed by 3 days, effectively derating the unit. This meets the specified criteria.

Secondly, 10CFR50.91 requires a licensee to " . . . explain why this emergency situation occurred and why it could not avoid this situation . . .". The basis for this request is that an unanticipated human error (i.e., not realizing that performance of the battery discharge test would have the resulting effect on the IRMs and entry into Operational Condition 5) was the cause. It should be noted that this is the first time this test has been performed on either Susquehanna unit since commercial operation, since it is a 60 month test. As soon as it became clear that this request was the only plausible way to avoid the startup delay, the appropriate internal processes were implemented in support of the submittal of this application.

As indicated by the marked up change PP&L requests that this change be effective as of today, September 14, 1987, in order to derive maximum benefit from the change.

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

Very truly yours,

BD Kenyon

B. D. Kenyon
Sr. 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

BEFORE THE
UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of :

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

PROPOSED AMENDMENT NO. 102

FACILITY OPERATING LICENSE NO. NPF-14

SUSQUEHANNA STEAM ELECTRIC STATION
UNIT NO. 1

Licensee, Pennsylvania Power & Light Company, hereby files proposed Amendment No. 102 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:

Bruce D Kenyon
Bruce D. Kenyon
Senior Vice President - Nuclear

Sworn to and subscribed before me
this 14th of September, 1987.

Dennis P. Castellano
Notary Public

DENNIS PATRICK CASTELLANO, NOTARY PUBLIC
SALEM TOWNSHIP, LUZERNE COUNTY
MY COMMISSION EXPIRES MARCH 26, 1990
Member, Pennsylvania Association of Notaries