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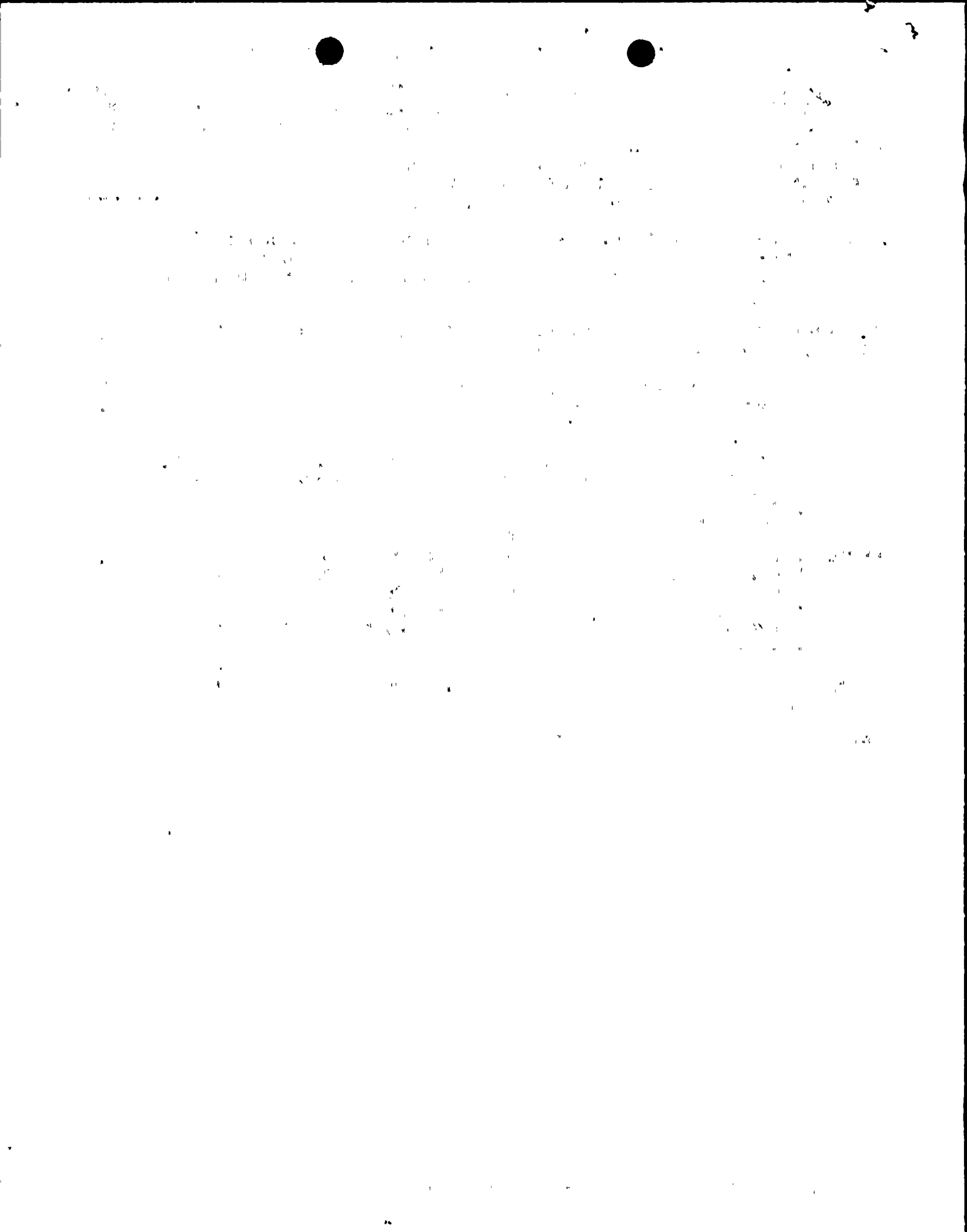
SUBJECT: Provides addl info re proposed Amend 94 to Licenses NPF-14 & NPF-47. Two hours min necessary time needed to restore standby gas treatment sys subsystem when both subsystems inoperable.

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**JAN 12 1988**

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Director of Nuclear Reactor Regulation  
Attn.: Dr. W. R. Butler, Project Director  
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Division of Reactor Projects  
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SUSQUEHANNA STEAM ELECTRIC STATION  
ADDITIONAL INFORMATION ON PROPOSED  
AMENDMENTS 94 TO NPF-14 AND 47  
TO NPF-22: SGTS ACTION TIME  
PLA-2946                      FILES A17-2, R41-2

Docket Nos. 50-387  
and 50-388

Reference: PLA-2837, B.D. Kenyon to W.R. Butler, dated April 13, 1987.

Dear Dr. Butler:

The referenced letter justified a change to Technical Specification 3.6.5.3, Standby Gas Treatment System (SGTS), which would make its restorative action time consistent with that of Specification 3.6.5.1, Secondary Containment. The change would allow 4 hours to restore at least one SGTS subsystem when both subsystems are inoperable. The purpose of this letter is to provide additional information which indicates how much time is needed in this condition to avoid entry into Specification 3.0.3 on a routine basis, independent of the reasoning provided in the referenced letter as to why 4 hours is an acceptable restriction from a safety perspective. PP&L has determined that the minimum necessary time is 2 hours based on the explanation provided below.

In order to support the performance of Surveillance Requirement 4.6.5.3b, both trains of SGTS have to be rendered inoperable. During this test, an outside air damper is electrically defeated in the open condition, thereby providing a necessary additional suction source so that the required flowrate of 10,100 cfm can be achieved. This action prevents SGTS from being able to automatically attain its recirculation mode during an accident and therefore, both subsystems are declared inoperable. This test (on one subsystem) takes approximately 1.5 hours to perform, if all goes perfectly. An extra 0.5 hours is added for conservatism in this estimate, resulting in the 2 hour figure. This value is bounding for surveillance purposes.

Although 2 hours meets our normal operational needs, PP&L chooses to stand by our original request for 4 hours for the following reasons (in order of priority):

*Accol 1/10*

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From the 1940s to the 1960s, the United States was a major force in the world.

1. Four hours is safe for the reasons specified in the referenced letter.
2. It mitigates the potential to simultaneously put both units through shutdown transients.
3. It mitigates the need to perform restorative work when Specification 3.0.3 is in affect.
4. It provides consistency between complementary systems supporting the same safety function from an operator training perspective.
5. An additional 2 hours over the necessary minimum of 2 hours is short from a practical standpoint. The fact that it is a large percentage increase is rendered moot by the safety analysis.
6. It mitigates the potential need to request emergency relief from the NRC.

If you have any questions on this material, please contact Mr. R. Sgarro at (215) 770-7916.

Very truly yours,



H. W. Keiser  
Vice President-Nuclear Operations

cc: ~~(NRC Document Control Desk (original))~~  
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