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 FACIL: 50-387 Susquehanna Steam Electric Station, Unit 1, Pennsylvania
 AUTH. NAME: CURTIS, N.W. AUTHOR AFFILIATION: Pennsylvania Power & Light Co.
 RECIP. NAME: SCHWENCER, A. RECIPIENT AFFILIATION: Licensing Branch 2

SUBJECT: Requests that 850409 application for Amend 67 to License NPF-14 be processed as emergency change. Refueling operations w/o using fuel loading chambers requested. Change required to permit refueling on schedule.

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Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101 • 215 / 770-5151

Norman W. Curtis
Vice President-Engineering & Construction-Nuclear
215/770-7501

APR 25 1985

Director of Nuclear Reactor Regulation
Attention: Mr. A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

SUSQUEHANNA STEAM ELECTRIC STATION
EMERGENCY CHANGE - PROPOSED AMENDMENT
NO. 67 TO NPF-14
ER 100450
PLA-2456

FILE 841-8

Docket No. 50-387

Reference: Letter, PLA-2445, B. D. Kenyon to A. Schwencer, dated
April 9, 1985

Dear Mr. Schwencer:

On April 9, 1985, PP&L transmitted the referenced proposed Amendment to License No. NPF-14 to you and requested that it be handled on an exigent basis pursuant to 10CFR50.91(a)(6).

The purpose of this letter is to request that the subject amendment now be processed as an emergency change in accordance with 10CFR50.91(a)(5). The proposed change would allow Susquehanna SES Unit 1 refueling operations to take place without using Fuel Loading Chambers (FLCs), based on the justification provided previously. As stated in the referenced letter, the changes are required in order to permit refueling to occur on its currently scheduled date of April 26, 1985. This milestone remains unchanged; therefore, with each day after April 26th that the proposed amendment remains unissued, a daily delay in the schedule to restart Unit 1 will occur. This unnecessary loss of generation forms the basis for this emergency request.

The following chronology of events is designed to illustrate that PP&L provided this request to you in a timely fashion.

Reactor defueling occurred over the period of 2/16 to 3/5/85. Based on suspected FLC saturation conditions during the weekend of 3/2, an investigation was initiated to determine not only what occurred but if the occurrence had safety implications. This effort included support from various functional groups within PP&L who attempted to determine the basis for the anomalous detector responses.

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Mr. A. Schwencer

PP&L's Nuclear Safety Assessment Group (NSAG) immediately launched its own investigation into whether or not detector operability had been compromised such that safety implications existed. Their investigation showed that while no adverse safety impact had occurred, the usefulness of the FLCs as neutron monitors in the presence of irradiated fuel was highly suspect. On 3/11/85, NSAG put a description of the event and several followup questions on Nuclear Network in order to get industry input. Based on some of the initial responses and the increasing evidence that FLCs should not be used in the subject application, PP&L began looking into different instrumentation and a Tech Spec change as the only solutions to the problem. NSAG's final report was issued March 27, 1985.

PP&L initially contacted NRC (Core Performance Branch) to substantiate that a change was a viable alternative; once this was affirmed and NRC's criteria for justification were known, PP&L initiated the appropriate analyses. Several followup conversations (3/29, 4/3, etc.) with NRC occurred in order to keep the staff abreast of our progress and avoid unnecessary iterations after submittal. The basis for the Tech Spec change was completed on April 3, 1985. Internal reviews, including the Plant Operations Review Committee and the Susquehanna Review Committee were completed by April 9, 1985. The proposed amendment was then immediately transmitted to the NRC.

Any questions on this letter should be directed to Mr. W. E. Barberich at (215) 770-7850.

Very truly yours,



N. W. Curtis
Vice President-Engineering & Construction-Nuclear

cc: M. J. Campagnone USNRC
R. H. Jacobs USNRC

T. M. Gerusky, Director
Bureau of Radiation Protection
Pa. Dept. of Environmental Resources
P. O. Box 2063
Harrisburg, PA 17120

