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

SUBJECT: Requests proposed change to FSAR Question 211.67 & Section 9.3.1.5.1 & 18.1.60 be approved prior to startup following Unit 2 refueling & insp outage currently scheduled to occur 880503.

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Director of Nuclear Reactor Regulation
Attn.: 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 CHANGE TO FSAR QUESTION 211.67 AND
FSAR SECTIONS 9.3.1.5.1 AND 18.1.60 — Docket Nos. 50-387
PLA-2992 FILES R41-2, S025, A17-1 — and 50-388

Dear Dr. Butler:

The Containment Instrument Gas (CIG) system provides instrument gas at 150 psig for the safety related main steam relief valves with Automatic Depressurization System (ADS) function and at 90 psig for all other pneumatic devices inside the containment.

The FSAR states that the basis for the long-term ADS requirement is derived from the long-term cooling acceptance criterion (Criterion 5) of 10CFR50.46. Based on this requirement, long-term cooling (100 days) capability is provided by supplying nitrogen to the ADS accumulators using a safety grade system. The safety related nitrogen storage (N_2-bottles) system contains adequate gas in storage for 30 days after a postulated Design Basis Accident (DBA) providing a backup supply to the ADS when the CIG compressors are not available thereby ensuring that the ADS is functional throughout the long term (100 days) shutdown.

The amount of time the N_2-bottles must maintain pressure is determined by the accessibility to recharge these bottles after a small break loss of coolant accident (LOCA). Accessibility is determined by the maximum dose rate due to contained sources as well as airborne contamination in the area of the charging connection. Presently, as stated above, the criteria is 30 days. PP&L has performed an evaluation and determined that Division 2 bottles 1T212-A thru M (Area 28, Elevation 749) and 2T212-A thru M (Area 34, Elevation 749) can be recharged within 3 days after a small break LOCA. For this evaluation, a 0.08 sq. ft. break in the discharge side of a recirculation loop was postulated. This size and location were selected because results from GE's small break analysis indicate that this particular small break produced the maximum peak cladding temperature. This particular break is bounding

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since it requires personnel entry to keep ADS functional and results in the highest reactor building dose when long-term ADS actuation is required.

The charging connection for the N_2 bottles referenced above is in an area that will have a dose rate of less than 500 mR an hour from contained sources within one hour after the break. The dose contribution from airborne activity reaches equilibrium within 1¼ days at 12 mR/hr. Thus, within 3 days the dose rate will be significantly below the 500 mR/hr FSAR infrequent occupancy personnel radiation exposure guidelines and will not present any restraints to accessibility.

In conclusion, due to accessibility to Division 2 N_2-bottles (1T212-A thru M, 2T212-A thru M) after a small break LOCA, the N_2-bottle storage requirement can be reduced. The proposed action is to change the appropriate FSAR sections from 30 days to 3 days.

PP&L requests this change be approved prior to startup following the Unit 2 Refueling and Inspection Outage currently scheduled to occur 5/3/88. Subsequent to approval the FSAR will be revised at the next regular update.

If you have any questions regarding the above proposal please direct them to J.B. Wesner at (215) 770-7906. Pursuant to 10CFR170, the appropriate fee is enclosed.

Very truly yours,

H. W. Keiser
Vice President-Nuclear Operations

cc: NRC Document Control Desk (original)
NRC Region I
Mr. F. I. Young, NRC Resident Inspector
Mr. M. C. Thadani, NRC Project Manager

Enclosure