

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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 FACIL: 50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylvania    05000388  
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 RECIPIENT AFFILIATION: BUTLER, W.R.    Project Directorate I-2

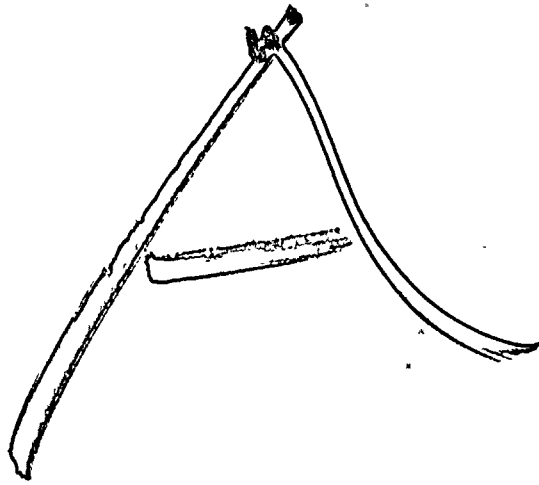
SUBJECT: Forwards application for amend to License NPF-22 changing Tech Specs re drywell cooling sys.

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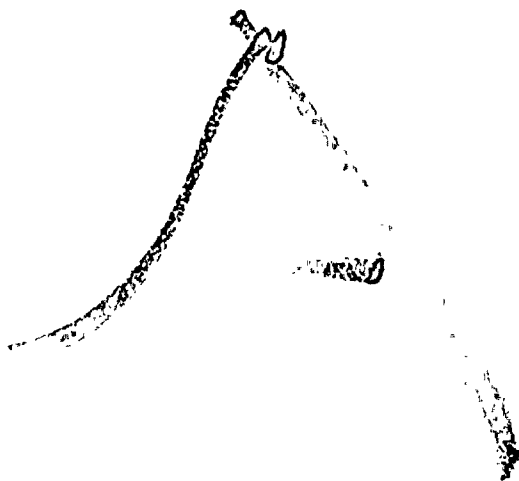
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Project Directorate I-2  
Division of Reactor Projects  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION  
PROPOSED AMENDMENT 62 TO LICENSE NO.  
NPF-22: EXIGENT REQUEST DUE TO NON-  
INSTALLATION OF DRYWELL COOLING MODS  
PLA-3018                      FILES A17-2, R41-2

Docket No. 50-388

Reference: Letter, W.R. Butler to H.W. Keiser, "Technical Specification Revisions Regarding Drywell Cooling System (TAC No. 61098), dated June 5, 1987.

Dear Dr. Butler:

Via the referenced letter, you approved Amendment 36 to the Susquehanna SES Unit 2 Operating License. The approved changes supported planned modifications to the SSES Unit 2 drywell cooling system that were to be installed during the ongoing Unit 2 second refueling and inspection outage. Due to a PP&L decision not to install the subject modifications, we are requesting that an exigent change to the Technical Specifications be processed to reflect that the SSES Unit 2 drywell cooling system will not be changing.

DESCRIPTION OF CHANGES

The following changes, which are illustrated on the attached marked-up pages, are proposed:

- o Specification 3.6.6.2: Delete reference to recirculation fans 2V418A&B, and add fans 2V415A&B to the LCO.
- o Table 3.8.4.1-1: Delete listings for the circuit breakers associated with drywell air flow fans 2V418A&B (Items A.14 and A.22). Renumber the list accordingly.

SAFETY ANALYSIS

The purpose of the proposed modifications which resulted in the information now proposed to be deleted was to enhance the functioning of the non-safety related drywell cooling system. In order to support the modifications, two safety functions controlled by the Technical Specifications had to be revised: primary containment overcurrent protection, and post-LOCA hydrogen mixing. The safety impact of this change on each of those functions is discussed below.

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Overcurrent Protection - This change was required in order to support the new recirculation fans, 2V418A&B, which were being added to enhance the drywell cooling capability in SSES Unit 2. Deletion of the associated circuit breakers from Table 3.4.8.1-1 has no safety impact because the fans are not being installed, and therefore the penetration does not require protection.

Post-LOCA Mixing- The new recirculation fans were also added to Specification 3.6.6.2 to functionally replace an existing unit cooler subsystem (2V415A&B). This subsystem is being retained since the fans are not being installed, and there is no change in the air flow capability between the two. Therefore, there is no change in the capability of the post-LOCA hydrogen mixing safety function.

Based on the above, the safe operation of Susquehanna SES Unit 2 is not adversely impacted by the proposed changes.

#### NO SIGNIFICANT HAZARDS CONSIDERATIONS

The following three questions are addressed below for each of the proposed changes:

- I. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?
  - II. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?
  - III. Does the proposed change involve a significant reduction in a margin of safety?
- o Specification 3.6.6.2
- I. No. The proposed change will require a unit cooler subsystem of the same airflow capability as the currently required recirculation fans. Utilizing the existing 2V415A&B fans for this purpose ensures that the post-LOCA hydrogen mixing capability of the drywell air flow system is consistent with the assumptions of the existing safety analysis.
  - II. No. The equivalent airflow capability of the existing fans as compared to the currently required fans precludes the potential for a new event; since the resulting configuration represents the original design, all pertinent safety analyses have already been performed.
  - III. No. The airflow capability required to support the hydrogen mixing safety function is unchanged by this proposal. Therefore, safety margin remains the same.
- o Table 3.8.4.1-1
- I. No. Primary containment penetration overcurrent protection is only required when loads exist which could jeopardize their associated penetrations. In this case, the loads, fans 2V418A&B, are not being installed. Therefore, no circuit breakers are required to protect the associated penetrations to ensure primary containment integrity, and consequently, no previous safety analysis is affected.



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- II. No. The currently required circuit breakers are not needed to perform any safety function for the reasons described in I above. Therefore, not installing them cannot result in a new event requiring further safety analysis.
- III. No. Not installing a device that has no safety function to perform has no impact on safety margin.

IMPLEMENTATION

PP&L is requesting that this proposed amendment be handled on an exigent basis as defined in 10CFR50.91. This requires the licensee to provide a reason for the exigency, why it cannot be avoided, and to show that the request was made in a timely manner.

The referenced approved amendment becomes effective upon startup after the ongoing Unit 2 second refueling and inspection outage, if this change is not approved. At that point, SSES Unit 2 will be prevented from startup due to Specification 3.6.6.2, which requires the non-existent 2V418A&B fans to be operable in operational conditions 1 and 2. The reason that this change needs to be handled on an exigent basis is that startup is currently scheduled to occur as early as May 5, 1988, and this does not support the normal 30-day notice period. With the respect to the timeliness of this request, PP&L has only recently completed its determination that the subject modifications will not be performed within the scope of the ongoing outage; therefore, this change could not have been proposed in time to support the normal 30-day process.

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

Very truly yours,



H. W. Keiser  
Sr. Vice President-Nuclear

Attachments

cc: NRC Document Control Desk (original)  
NRC Region I  
Mr. F. I. Young, NRC Sr. Resident Inspector-SSES  
Mr. M. C. Thadani, NRC Project Manager-Bethesda  
Mr. T. M. Gerusky, Pennsylvania DER



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