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 50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylva 05000388
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 KEISER,H.W. Pennsylvania Power & Light Co.
 RECIPIENT AFFILIATION
 BUTLER,W.R. Project Directorate I-2

SUBJECT: Forwards applications for Proposed Amends 113 & 64 to Licenses NPF-14 & NPF-22, respectively, revising LC 2.C(6).

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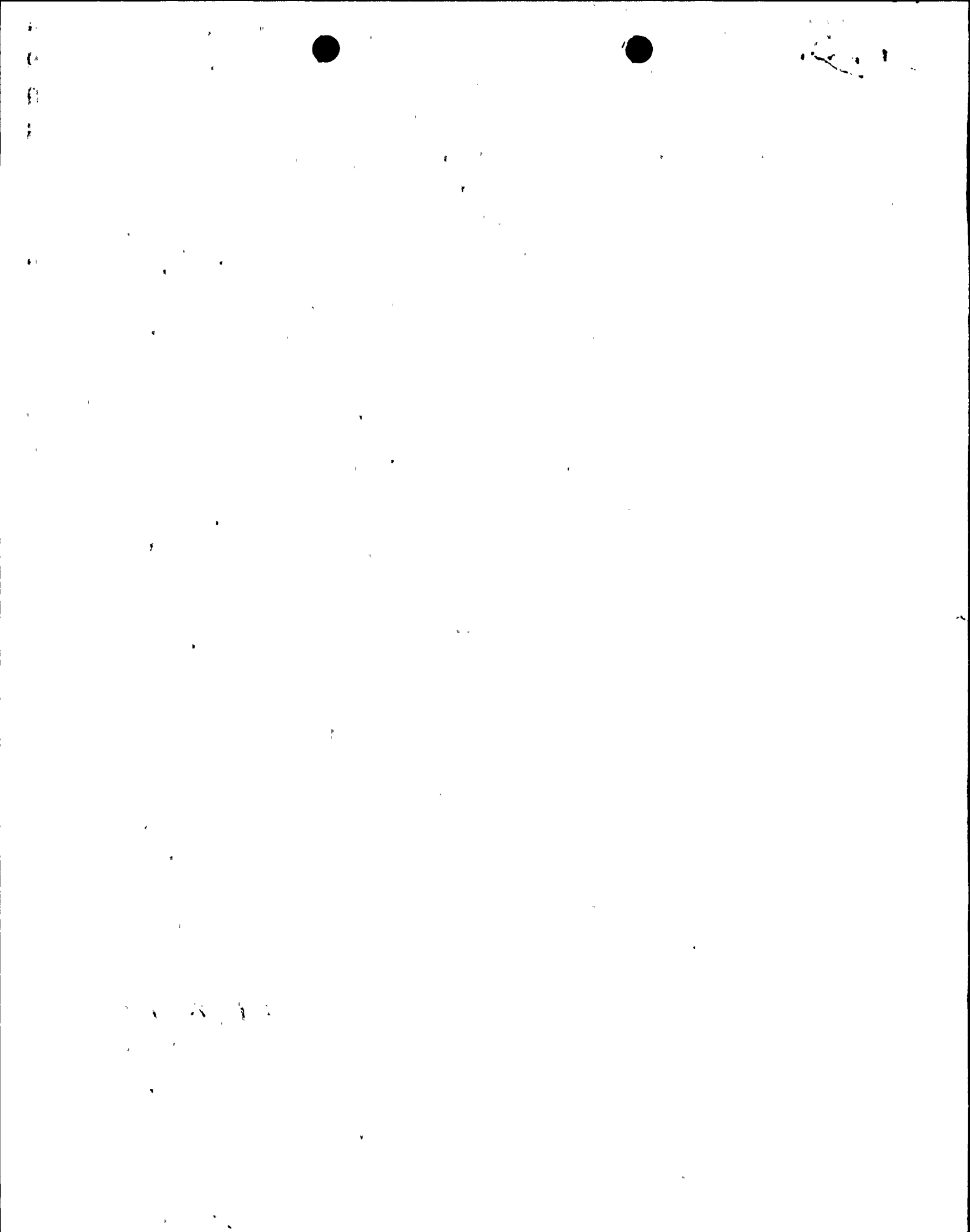
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Pennsylvania Power & Light Company

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Director of Nuclear Reactor Regulation
Attention: Dr. W. R. Butler, Project Director
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Division of Reactor Projects
U.S. Nuclear Regulatory Commission
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SUSQUEHANNA STEAM ELECTRIC STATION
PROPOSED AMENDMENT NO. 113 TO LICENSE
NO. NPF-14 AND PROPOSED AMENDMENT NO. 64 TO LICENSE
NO. NPF-22
PLA-3064

Docket Nos. 50-387
and 50-388

FILE R41-2

Dear Dr. Butler:

The purpose of this letter is to revise License Condition 2.C(6) of License No. NPF-14 and License Condition 2.C(3) of License No. NPF-22 based on the recommendations which the NRC provided via Generic Letter 86-10.

BACKGROUND

The Licenses (NPF-14 and NPF-22) for Susquehanna SES Units 1 and 2 contain license conditions which require commission approval prior to implementing changes to the Fire Protection Program even for relatively minor changes. These license conditions also are subject to interpretations on what is required to be followed.

The NRC recognized that there are problems with license conditions and have proposed solutions in Generic Letter 86-10, "Implementation of Fire Protection Requirements." The guidance provided in Generic Letter 86-10 encourages an amendment to revise the license condition to allow modifications to the Fire Protection program using the provisions of 10CFR50.59.

DESCRIPTION OF CHANGES

License Condition 2.C(6) of License No. NPF-14 and License Condition 2.C(3) of License No. NPF-22 should be revised to read as follows:

Pennsylvania Power & Light Company shall implement and maintain in effect all provisions of the approved fire protection program as described in the Fire Protection Review Report for the facility

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PDR ADOCK 05000387
P PDC

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Dear Sir,
I have the honor to acknowledge the receipt of your letter of the 14th inst. regarding the matter mentioned therein. The same has been referred to the appropriate authorities for their consideration.

I am sorry that I cannot give you a more definite answer at this time, but the matter is still under consideration. I will be glad to advise you again as soon as a final decision has been reached.

Very truly yours,
[Signature]

OFFICE

It is noted that the same has been referred to the appropriate authorities for their consideration. I will be glad to advise you again as soon as a final decision has been reached.

I am sorry that I cannot give you a more definite answer at this time, but the matter is still under consideration. I will be glad to advise you again as soon as a final decision has been reached.

FOR THE DIRECTOR

I am sorry that I cannot give you a more definite answer at this time, but the matter is still under consideration. I will be glad to advise you again as soon as a final decision has been reached.

I am sorry that I cannot give you a more definite answer at this time, but the matter is still under consideration. I will be glad to advise you again as soon as a final decision has been reached.

1-2-51

and as approved in the SER dated _____ subject to the following provision:

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shut-down in the event of a fire.

SAFETY ANALYSIS

The changes to the License Conditions are designed to eliminate the problem of requesting the Commission approval prior to implementing changes to the Fire Protection Program. In Generic Letter 86-10, the Commission stated that the best way to resolve this problem is to incorporate the fire protection program and major commitments, including the fire hazards analysis, by reference into the Final Safety Analysis Report (FSAR) for the facility. In this manner, the fire protection program, including the systems, the administrative and technical controls, the organization, and other plant features associated with fire protection would be on a consistent status with other plant features described in the FSAR. Also, the provisions of 10CFR50.59 would then apply directly for changes PP&L desires to make in the fire protection program that would not adversely affect the ability to achieve and maintain safe shutdown.

The proposed revisions to the License Conditions will correct the problem associated with requiring Commission approval for all changes to the Fire Protection Program without changing PP&L's current level of commitment regarding fire protection. Therefore, no change has occurred to the current level of plant safety.

NO SIGNIFICANT HAZARDS CONSIDERATIONS

The proposed changes do not:

- I. Involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed revisions to the License Conditions do not alter PP&L's existing commitments on fire protection. These commitments have been reviewed and approved by the NRC. The probability and consequences of accidents has been evaluated for the approved Fire Protection Review Report (FPRR) and these License Conditions require that proposed changes to the approved FPRR be evaluated via the 50.59 process to determine if there is any increase in the probability or consequences of an accident.

- II. Create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed revisions to the License Conditions do not alter PP&L's existing evaluation of possible accidents. The License Conditions

10-10-68

Dear Mr. [Name],

I am writing to you regarding the [Topic].

The information provided is as follows:

It is important to note that [Detail].

Please contact me if you have any questions.

Sincerely,
[Signature]

require that proposed changes to the Fire Protection Review Report be evaluated via the 50.59 process to determine if the possibility of a new or different kind of accident has been created by the proposed change.

III. Involve a significant reduction in a margin of safety.

The proposed revisions to the License Conditions are consistent with PP&L's existing commitments on fire protection. Since the provisions of 10CFR50.59 allow for the evaluation of any reduction in the margin of safety, the addition of allowing the use of the provisions of 10CFR50.59 for the fire protection program will not involve a reduction in a margin of safety.

Any questions on the above material should be directed to Mr. C. T. Coddington at (215) 770-7915. Pursuant to 10CFR170 the appropriate fee is enclosed.

Very truly yours,



H. W. Keiser

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

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