

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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

SUBJECT: Forwards application for proposed Amends 120 & 69 to Licenses NPF-14 & NPF-22, respectively.

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FEB 28 1989

Director of Nuclear Reactor Regulation  
Attention: 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 AMENDMENT NO. 120 TO NPF-14  
AND PROPOSED AMENDMENT NO. 69 TO NPF-22  
ATWS  
PLA-3159 FILE A17-2

Docket Nos. 50-387  
and 50-388

Dear Dr. Butler:

Pursuant to 10CFR50.90, Pennsylvania Power & Light Co. requests amendments, in the form of Technical Specification changes, to Operating Licenses NPF-14 and NPF-22 for Susquehanna Steam Electric Station Units 1 and 2. Marked-up revisions to affected Technical Specification pages are included as an attachment to this PLA.

BACKGROUND

Technical Specifications 3.3.4.1, Table 3.3.4.1-1; Footnote (a), reflects the ATWS-Recirculation Pump Trip (RPT) system logic as being a one out of two taken twice trip logic. The actual trip logic as illustrated in FSAR Figure 7.7-7, Sheet 6 requires two out of two trip function actuations for a complete trip logic.

In a one out of two logic scheme, one channel could be inoperable for up to two hours (for required surveillance testing) because protection is provided by the remaining trip channel. However on the existing ATWS-RPT design, protection is provided by the divisionally separate and redundant trip system. Therefore a channel can only be placed in inoperable status for up to two hours (for required surveillance testing), if the other trip system is operable.

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### DESCRIPTION OF CHANGE

The following changes, which are illustrated on the attached marked-up pages, are proposed for Units 1 and 2:

- o Specification 3.3.4.1, Table 3.3.4.1-1: Delete Footnote (a) on Table 3.3.4.1-1 and replace with the following new Footnote (a):
  - (a) One channel or trip system may be placed in an inoperable status for up to 2 hours for required surveillance provided the other trip system is OPERABLE. Upon determination that a trip setpoint cannot be restored to within its specified value during performance of the CHANNEL CALIBRATION, the appropriate ACTION shall be followed.

### SAFETY ANALYSIS

The proposed change eliminates the potential for an interpretation which would result in entering Footnote (a) for a Division I channel calibration when a trip channel in Division II is inoperable. The proposed change requires that the redundant trip system be operable as a condition for invoking Footnote (a).

The proposed change more accurately reflects the logic and capability of the ATWS-RPT system. The more limited condition under which instrument trip channels may be placed in an inoperable status for required surveillances prevents the possible temporary loss of the trip function which could occur, based on the current language in the Footnote.

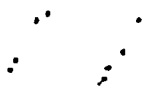
To provide further assurance of correct interpretation a second sentence was added to Footnote (a). This sentence was incorporated to ensure that the 2 hour provision was not considered to be running in parallel to the time requirements contained in the Action statements, and also to assure that the appropriate Action was entered at the point where other than normal calibration procedures had to be used to restore operability i.e., if repair work had to be performed, it would be done under the appropriate Action; not under whatever was left of the 2 hour provision PLUS the time added under the appropriate Action.

### NO SIGNIFICANT HAZARDS EVALUATION

The proposed change does not:

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

No. The proposed changes ensures plant safety by revising wording in the Technical Specifications to be consistent with the Plant design. The purpose of the ATWS-RPT system is to provide a means of limiting the



consequences of the unlikely event of a failure to scram during an anticipated transient. The ATWS-RPT system function is not altered by this proposed change.

The new wording in Table 3.3.4.1-1 ensures proper compliance with the established Allowed Outage Times (AOTs). This new language is not related to the probability or consequences of an existing accident evaluation; to simply clarify existing requirements to ensure compliance with their intent.

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

No. The proposed change realigns Footnote (a) in Table 3.3.4.1-1 to be consistent with the Plant design. There are no physical or functional modifications to the ATWS-RPT system; therefore, the possibility of a new event is not created.

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

The ATWS-RPT system limits the consequences of the unlikely event of a failure to scram during an anticipated transient. It is the system logic which ensures that this margin of safety is not violated. As presently written, Footnote (a) would allow the ATWS-RPT logic to be placed in a condition which increases the probability that the margin of safety has been reduced. The proposed changes however reword the Footnote to reflect the actual logic scheme which ensures the margin of safety remains intact.

IMPLEMENTATION

PP&L requests the proposed Technical Specification changes be approved by September 15, 1989.

Any questions on this proposal should be directed to Mr. D.J. Walters at (215) 770-6536.

Very truly yours,



H. W. Keiser

Attachment

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



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