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 50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylv 05000388

AUTH. NAME AUTHOR AFFILIATION
 KEISER, H.W. Pennsylvania Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 BUTLER, W.R. Project Directorate I-2

SUBJECT: Reactivates proposed Amends 75 & 29 to Licenses NPF-14 & NPF-22 re "other changes" withdrawn from subj amends.

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Harold W. Keiser
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APR 24 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
REACTIVATION OF PROPOSED AMENDMENTS
75 AND 29 TO LICENSE NOS. NPF-14
AND NPF-22: ADS ACTIONS
(TAC NOS. 60435/60436)
PLA-3188 FILES A17-2/R41-2

Docket Nos. 50-387
and 50-388

- References:
1. Letter, M.C. Thadani (NRC) to H.W. Keiser (PP&L), "Closeout of Technical Specifications Change Request dated January 31, 1985, as revised May 3, 1985 (TAC Nos. 60435/60436)," dated February 3, 1989.
 2. Letter, N.W. Curtis (PP&L) to A. Schwencer (NRC), "Proposed Amendments 61 to NPF-14 and 15 to NPF-22," dated January 31, 1985.
 3. Letter, N.W. Curtis (PP&L) to A. Schwencer (NRC), "Revision to Proposed Amendments 61 and 15," dated May 3, 1985.
 4. Letter, W.R. Butler (NRC) to N.W. Curtis (PP&L), "Amendment Nos. 44 and 11 to Facility Operating License Nos. NPF-14 and NPF-22, Susquehanna Steam Electric Station, Units 1 and 2," dated May 15, 1985.
 5. Letter, H.W. Keiser (PP&L) to E. Adensam (NRC), "Proposed Amendments 75 to NPF-14 and 29 to NPF-22," dated December 19, 1985.

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6. General Electric Report NEDC-30936P, "BWR Owners' Group Technical Specification Improvement Methodology (With Demonstration For BWR ECCS Actuation Instrumentation) Part 1," November 1985.
7. Letter, W.R. Butler (NRC) to H.W. Keiser (PP&L), "Susquehanna Steam Electric Station Units 1 and 2 - Technical Specification Change Request, dated January 31, 1985 (Revised May 3, 1985)," dated May 1, 1987.
8. Letter, A.C. Thadani (NRC) to D.N. Grace (BWROG), "General Electric Company (GE) Topical Report NEDC-30936P, 'BWR Owners' Group Technical Specification Improvement Methodology (With Demonstration For BWR ECCS Actuation Instrumentation), Part 1'," dated December 9, 1988.

Dear Dr. Butler:

The purpose of this letter is to request that NRC reopen TAC Nos. 60435/60436 which were closed via Reference 1. The justification for this request, provided below, is the same as was described to you in the March 13, 1989 meeting held at PP&L in Allentown.

Background & Justification

By letter dated January 31, 1985 (Reference 2), PP&L submitted changes to the SSES Units 1 and 2 Technical Specifications to support NRC approved logic modifications to the Automatic Depressurization System (ADS). As a consequence of our review prior to submittal, other changes to the ADS Technical Specifications were also proposed.

After discussion of the "other changes" with NRC, PP&L withdrew a portion of the proposed amendments by letter dated May 3, 1985 (Reference 3). NRC subsequently approved the ADS logic modification changes on May 15, 1985 (Reference 4).

On December 19, 1985 (Reference 5), PP&L again proposed the "other changes" that had been withdrawn by Reference 3. Further risk-based justification was provided as the basis; this depended heavily on a General Electric (GE) report (Reference 6) that at the time was under generic review by NRC. NRC's response to our application was first provided in a May 1, 1987 letter (Reference 7) which requested withdrawal of our proposed amendment based on the protracted review of the GE report. PP&L did not withdraw the submittal based on a belief that the GE report was close to an SER. We communicated this verbally to our Project Manager. An NRC SER was issued for the GE report on December 9, 1988 (Reference 8).

Based on NRC's approval of the GE report occurring prior to your notifying us that the related TAC Nos. were considered closed, PP&L hereby requests that the TAC Nos. be reopened and the review of our December 19, 1985 proposal be reactivated.

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Thank you for reconsidering your position in light of the admittedly confusing correspondence that has occurred relative to this issue. Please direct any questions to Mr. R. Sgarro at (215) 770-7916.

Very truly yours,



H. W. Keiser

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

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