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SUBJECT: Requests amend to License NPF-22,deleting changes previously approved for RHR waterhammer mod.

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JUN 16 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 73 TO NPF-22 CHANGES
TO SSES UNIT 2 TECHNICAL SPECIFICATIONS TO
SUPPORT RHR WATERHAMMER AND RHR STEAM
CONDENSING MODE MODIFICATIONS
PLA-3212 FILES A17-2, R41-2 Docket No. 50-388

References: 1. PLA-2955, H.W. Keiser to USNRC, "Proposed Amendment 57 to License NPF-22: RHR Waterhammer Modification," dated December 23, 1987.

2. Letter, W.R. Butler to H.W. Keiser, "Technical Specification Changes Supporting RHR Waterhammer Suppression Modifications," dated May 24, 1988.

Dear Dr. Butler:

The purpose of this letter is to propose changes to the Susquehanna SES Unit 2 Technical Specifications to delete changes which were previously approved for the RHR Waterhammer modification and to correct previously approved changes for the RHR Steam Condensing Mode modification (see References 1 and 2).

DESCRIPTION OF CHANGES

This proposal results in the deletion of valves and a footnote from Table 3.6.3-1, "Primary Containment Isolation Valves" and the deletion of a paragraph in Bases Section 3/4.6.2 which is associated with these valves. Also this proposal results in the relocation of an existing valve from the "Manual" to the "Other" section of Table 3.6.3-1, "Primary Containment Isolation Valves." This proposal removes valves which no longer require continuous thermal overload protection from Table 3.8.4.2.1-1, "Motor Operated Valves Thermal Overload Protection Continuous." The changes are illustrated on the attached marked-up pages.

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SAFETY ANALYSIS

Amendment #49 dated 5/24/88 to the Susquehanna SES Unit 2 Operating License added primary containment isolation valves HV-25129 A&B to Table 3.6.3-1. These valves were added as part of the initial RHR waterhammer (backpressure control valve) modification (Reference 1). Based upon reduced SRV leakage and improved suppression pool temperature measuring methods, a decision was made to cancel the RHR waterhammer backpressure control valve modification. The improvements noted reduce the frequency and duration of cycles that RHR operates in suppression pool cooling to within the design basis as stated in the FSAR. Since this modification has been cancelled, and the valves are not being installed, an administrative change to the Technical Specification table is required.

Amendment #49 also added a paragraph to Section B 3/4.6.2 explaining the initial Suppression Pool Cooling modification. Since as stated above this modification has been cancelled, this information is no longer required.

In a previous Amendment to the Technical Specifications, PP&L made a modification which eliminated the steam condensing mode of RHR. In this amendment the containment isolation valves (HV-251F011 A&B) were moved to Section B (Manual Isolation Valves) of Table 3.6.3-1. These valves should have been moved to Section C (Other Valves) since these valves are locked closed manual valves because the electrical connections, controls and position indicating lights were removed.

Also since the motor operators have been removed from valves 2F026 A&B, these valves no longer need to be listed in Table 3.8.4.2.1-1. This table identifies Class IE valves which require their thermal overload protection to be bypassed in order to perform their safety function.

NO SIGNIFICANT HAZARDS CONSIDERATIONS

I. The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

As stated previously, a decision was made to cancel the RHR waterhammer backpressure control valve modification based upon reduced SRV leakage and improved suppression pool temperature measuring methods. The improvements noted reduce the frequency and duration of cycles that the RHR system operates in suppression pool cooling to within the design basis as stated in the FSAR. Therefore, the deletion of the proposed valves (HV-25129 A&B) from Table 3.6.3-1 does not affect the probability or consequences of an accident previously evaluated.

Since the waterhammer modification is being cancelled, the deletion of the revised Section B 3/4.6.2 is an administrative change.

The moving of valves (HV-251F011 A&B) from Section B (Manual Isolation Valves) of Table 3.6.3-1 to Section C (Other Valves) does not impact the containment isolation function of these valves. Therefore this change is administrative in nature.

The removal of the HV-251F011 A&B and HV-251F026 A&B valves from Table 3.8.4.2.1-1 is due to the fact that they are no longer motor operated and therefore are not required to have thermal overload protection.

II. The proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated. Since improvements have been made to the plant, and the RHR system operates within the design bases as stated in the FSAR, the deletion of the proposed valves does not create any new concerns. The removal of the revised Bases section and the rearrangement of valves on Table 3.6.3-1 are administrative changes and do not create new concerns.

Since the power from valves HV-E11-2F011 A&B and HV-E11-2F026 A&B is removed and leakage requirements for containment integrity and isolation do not change, no new concerns are created by this proposal.

III. The proposed changes do not involve a significant reduction in a margin of safety.

Since the RHR system functions within the design basis, the overall safety margin is not reduced by not installing the proposed valves. The deletion of the Bases section and the revision to Table 3.6.3-1 are administrative changes and do not reduce the margin of safety. Since the containment isolation and integrity are assured to the same relevant criteria as discussed previously, the overall safety margin has not been reduced due to the proposed changes to Table 3.8.4.2.1-1.

IMPLEMENTATION

The proposed changes are required for the Unit 2 Third Refueling and Inspection Outage, which is currently scheduled to begin September 9, 1989 and to end as early as November 10, 1989. Therefore, it is requested that these changes be approved prior to November 10, 1989 and be conditioned to become effective prior to startup following the outage.

Any questions on this submittal should be directed to Mr. C.T. Coddington at (215) 770-7915.

Very truly yours,

H. W. Keiser

cc: NRC Document Control Desk (original)
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