ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:8910110192 DOC.DATE: 89/10/02 NOTARIZED: YES DOCKET #
FACIL:50-387 Susquehanna Steam Electric Station, Unit 1, Pennsylva 05000387
50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylva 05000388
AUTH.NAME AUTHOR AFFILIATION
KEISER,H.W. Pennsylvania Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
BUTLER,W.R. Project Directorate I-2

SUBJECT: Forwards Proposed Amend 125 & 76 to Licenses NPF-14 & NPF-22,revising requirements of Tech Spec 4.0.2.

DISTRIBUTION CODE: A001D COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 48
TITLE: OR Submittal: General Distribution

NOTES:LPDR 1 cy Transcripts. 05000387
LPDR 1 cy Transcripts. 05000388

	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL
	PD1-2 LA	1	1	PD1-2 PD	1	1
	THADANI,M	5	5			
INTERNAL:	ACRS	6	6	NRR/DEST/ADS 7E	1	1
	NRR/DEST/ESB 8D	1	1	NRR/DEST/ICSB	1	1
	NRR/DEST/MTB 9H	1	1	NRR/DEST/RSB 8E	1	1
	NRR/DOEA/TSB 11	1	1	NUDOCS-ABSTRACT	1	1
	OC/LFMB	1	0	OGC/HDS2	1	0
	REG FILE 01	1	1	RES/DSIR/EIB	1	1
EXTERNAL:	LPDR	1	1	NRC PDR	1	1
	NSIC	1	1			
NOTES:		2	2			

R I D S / A D D S

R I D S / A D D S

ltr 2

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK, ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 29 ENCL 27

PP&L Pennsylvania Power & Light Company
Two North Ninth Street • Allentown, PA 18101 • 215/770-5151

Harold W. Keiser
Senior Vice President-Nuclear
215/770-4194

OCT 0 2 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 125 TO LICENSE NPF-14
AND AMENDMENT 76 TO LICENSE NPF-22
PLA-3267 FILES A17-2/R41-2

Docket Nos. 50-387
and 50-388

Dear Dr. Butler:

The purpose of this letter is to propose amendments to Facility Operating Licenses NPF-14 and NPF-22. The proposed amendments seek to change the requirements of Technical Specification 4.0.2. Currently, Technical Specification 4.0.2 allows surveillance intervals to be extended up to 25 percent of the time interval specified but limits the combined time interval for any three consecutive surveillance intervals to no more than 3.25 times the specified surveillance interval. The proposed change seeks removal of the 3.25 limit. The proposed change is consistent with the guidance provided in Generic Letter 89-14, "Line-Item Improvements in Technical Specifications-Removal of the 3.25 Limit on Extending Surveillance Intervals."

Background

Experience indicates that the currently required surveillance intervals, with the provision to extend them by 25 percent, are generally sufficient to accommodate normal operational variations. However, we have had to request and were granted a one-time exception to the 3.25 limit on extending refueling surveillances for the Susquehanna SES, Unit 2, Third Refueling and Inspection Outage.

Commonwealth Edison Company submitted a lead-plant proposal for the LaSalle Technical Specifications to remove the 3.25 limitation for all surveillances. The proposal was approved.

Based on the above and the guidance provided in Generic Letter 89-14, we are submitting this proposed change to remove the 3.25 limitation for all surveillances for the Susquehanna SES Units 1 and 2 Technical Specifications.

A001
1/1

Description of the Change

The proposed change deletes the current requirements of Technical Specification 4.0.2 and replaces them with the following:

> 4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval.

Additionally, the Bases Section of Technical Specification 4.0.2 must be changed. The proposed change to the Bases Section is in accordance with the guidance of Generic Letter 87-09. The changed section should read as follows:

> Specification 4.0.2 established the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 18-month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of Specification 4.0.2 is based on engineering judgement and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

Safety Analysis

Technical Specification 4.0.2 accepts currently established surveillance intervals and the use of a 25 percent extension as providing a sufficient level of protection. The intent of the 3.25 limit is to preclude routine use of the provision for extending a surveillance interval by 25 percent. The Commission in its review of Commonwealth Edison Company's lead-plant proposal to remove the 3.25 limitation on extending surveillance intervals stated the following:

> "The use of the allowance to extend surveillance intervals by 25 percent can also result in a significant safety benefit for surveillances that are performed on a routine basis during plant operation. This safety benefit is incurred when a surveillance interval is extended at a time that conditions are not suitable for performing the surveillance. Examples of this include transient plant operating conditions or conditions in which safety systems are out of service because of ongoing surveillance or maintenance activities. In such cases, the safety benefit of allowing the use of the 25 percent allowance to extend a surveillance interval would

outweigh any benefit derived by limiting three consecutive surveillance intervals to the 3.25 limit. Also, there is the administrative burden associated with tracking the use of the 25 percent allowance to ensure compliance with the 3.25 limit. On the basis of these considerations, the staff concluded that removal of the 3.25 limit will have an overall positive impact on safety."

Based on the above, the proposed change to Technical Specification 4.0.2 will remove unnecessary restriction on extending surveillance requirements and will result in a benefit to safety when plant conditions are not conducive to the safe conduct of surveillance requirements. The removal of the 3.25 limit will provide greater flexibility in the use of the provision for extending surveillance intervals, reduce the administrative burden associated with its use, and have a positive effect on safety.

<u>No Significant Hazards Considerations</u>

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

The 3.25 surveillance interval extension criteria of Technical Specification 4.0.2 was not taken credit for in the evaluation of the probability or severity of events analyzed in the plant accident analysis (FSAR Chapter 15).

Additionally, the 18 month refuel interval was originally chosen to correspond to the expected operating cycle length such that these surveillances would be performed during the shutdown period (Reference Generic Letter 83-27). Since no technical basis is specified for the 18 month interval other than conformance with expected operating cycle length, deleting the 3.25 requirement for 18 month surveillances does not involve a significant decrease in the effectiveness of the monitoring provision.

II. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated since the surveillance interval will still be constrained by the maximum 1.25 interval extension criteria of Technical Specification 4.0.2.

III. The proposed change does not involve a significant reduction in the margin of safety. The Commission in its review of Commonwealth Edison Company's lead-plant proposal to remove the 3.25 limitation on extending surveillance intervals stated the following:

"The use of the allowance to extend surveillance intervals by 25 percent can also result in a significant safety benefit for surveillances that are performed on a routine basis during plant operation. This safety benefit is incurred when a surveillance interval is extended at a time that conditions are not suitable for performing the surveillance. Examples of this include transient

plant operating conditions or conditions in which safety systems are out of service because of ongoing surveillance or maintenance activities. In such cases, the safety benefit of allowing the use of the 25 percent allowance to extend a surveillance interval would outweigh any benefit derived by limiting three consecutive surveillance intervals to the 3.25 limit. Also, there is the administrative burden associated with tracking the use of the 25 percent allowance to ensure compliance with the 3.25 limit. On the basis of these considerations, the staff concluded that removal of the 3.25 limit will have an overall positive impact on safety."

Guidance has been provided in 51 FR 7744 for the application of standards to license change requests for determination of the existence of significant hazards considerations. This document provides examples of amendments which are and are not considered likely to involve significant hazards considerations. This proposed amendment does not involve a significant relaxation of the criteria used to establish safety limits, a significant relaxation of the bases for the limiting safety system settings or a significant relaxation of the bases for the limiting conditions for operations. Therefore, based on the guidance provided in the Federal Register and the criteria established in 10 CFR 50.92(e), the proposed change does not constitute a significant hazards consideration.

Implementation

Expeditious review of this proposed change is requested. The proposed amendment is consistent with guidance provided in Generic Letter 89-14, dated August 21, 1989.

Any questions on this submittal should be directed to Mr. W.W. Williams at (215) 770-7910.

Very truly yours,

H. W. Keiser

Attachment

cc: NRC Document Control Desk (original)
NRC Region I
Mr. G. S. Barber, NRC Resident Inspector - SSES
Mr. M. C. Thadani, NRC Project Manager
Mr. T. M. Gerusky, Pennsylvania DER