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 FACIL: 50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylv 05000388
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 RUSSELL, W.T. Region 1, Ofc of the Director

SUBJECT: Requests enforcement discretion form Tech Spec 4.5.1.C.2 & 4.7.3.C.2.

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NOV 17 1989

Mr. William T. Russell
Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

SUSQUEHANNA STEAM ELECTRIC STATION
REQUEST FOR ENFORCEMENT DISCRETION
PLA-3300 FILES R41-2/A17-2

Docket No. 50-388

Dear Mr. Russell:

This letter is to request enforcement discretion from Technical Specification 4.5.1.C.2 and 4.7.3.C.2 as discussed with your staff and Dr. W.R. Butler today. This action is necessary due to the design modification to the test throttle valves for the HPCI and RCIC systems. The test throttle valve internals were modified because at design conditions the valves were suspect to cavitation.

On November 16, 1989 with the SSES Unit 2 reactor in Condition 2 the 18 month surveillance test was run on the Reactor Core Isolation Cooling (RCIC) System to verify the requirement of Technical Specification 4.7.3.C.2. This specification requires verification that the system will develop a flow of greater than or equal to 600 gpm in the test flow path where steam is supplied to the turbine at a pressure of 150, +15, -0 psig. Contrary to the requirements of this specification the maximum flow we were able to achieve in the test flow path is 530 gpm. The failure of this surveillance is interpreted by PP&L to prevent our increasing reactor pressure beyond 150 lbs. within our Plant startup.

The cause of the inability of the RCIC to achieve the specified flow at 150 psig is attributable to a modification installed in the Unit 2 Third Refueling Outage to the test valve in the test path portion of RCIC piping. The test valve internals were modified to correct severe erosion and vibration experienced when the RCIC system is tested for its quarterly surveillance at 920 psig (Surveillance Requirement 4.7.3). This new internals were designed to achieve an acceptable flow condition at the 920 psig test condition but did not consider the flow effects of operation at 150 psig. A calculation using this surveillance data was performed and showed that the pump's performance was within the pump-flow line assuming the new flow path configuration.

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The surveillance test for HPCI has not yet been performed, however, since the test throttle valve for HPCI has been modified similar to RCIC, we expect that the test flow path would not develop the Technical Specification required flow.

Since the surveillance for RCIC did not pass, we cannot go above 150 psi reactor steam pressure. We believe that based upon the design of test flow path both HPCI and RCIC will be able to develop the required flow in the test path at 920 psi steam pressure.

We are requesting this enforcement discretion until the Office of Nuclear Reactor Regulation acts upon an Emergency Technical Specification Amendment Request which will be submitted before the close of business on November 21, 1989.

Upon granting of the enforcement discretion, PP&L will proceed with the startup of Susquehanna SES Unit 2. The following additional actions will be implemented to maximize the impact of the requested relief pending approval of the Emergency Tech Specs.

1. We will run surveillance 4.5.1.C.2 for HPCI and verify the flow achieved at turbine pressure of 150 ± 15 psig is within the required head flow curve for the pump. Should the pump not achieve satisfactory test results we will consider this a failed surveillance and take the appropriate actions.
2. We will perform the quarterly surveillance for HPCI (Specification 4.5.1.b.3) at 920 +140, -20 psig. Failure of this test will result in a controlled shutdown.
3. We will perform the quarterly surveillance for RCIC (Specification 4.7.3.b). Failure of this test will result in a controlled shutdown.

We appreciate your attention and timely action in this matter; any questions should be directed to Mr. J.M. Kenny at (215) 770-7904. When the enforcement discretion issue has been decided, please contact the Susquehanna SES Shift Supervisor at (717) 542-3907.

Very truly yours,


H. W. Keiser



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



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