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 RECIP. NAME RECIPIENT AFFILIATION
 BUTLER, W.R. Project Directorate I-2

SUBJECT: Forwards application for amends to Licenses NPF-14 & NPF-22, changing Tech Spec 6.4. re training program.

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Pennsylvania Power & Light Company

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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. 130 TO
LICENSE NO. NPF-14 AND
PROPOSED AMENDMENT NO. 82 TO
LICENSE NO. NPF-22
LICENSED OPERATOR TRAINING
PLA-3369 FILES A17-2/R41-2

Docket Nos. 50-387
and 50-388

Dear Dr. Butler:

The purpose of this letter is to propose changes to the Susquehanna SES Unit 1 and Unit 2 Technical Specifications. These changes are as a result of responding to the Notice of Violation (387/89-80-02; 388/89-80-02), on our training program.

DESCRIPTION OF CHANGE

The following changes to Specification 6.4 which are illustrated on the attached marked-up pages, are proposed for both Unit 1 and 2. The phrase "and Appendix 'A' of 10CFR55 and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1988 NRC letter to all licensees, and shall include familiarization with relevant industry operational experience" is being deleted.

The phrase "except that the licensed operator initial training and requalification programs shall meet or exceed the requirements of 10CFR55 and utilize the guidance contained in Regulatory Guide 1.8, Rev. 2" is being added.

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SAFETY ANALYSIS

With the revision to 10CFR55 that became effective on 5/26/87, portions of Technical Specification 6.4 (Training) became obsolete. In addition, PP&L response to the NRC Notice of Violation dated 1/22/90 committed to incorporate the guidance of Regulatory Guide 1.8, Rev. 2 into our licensed operator requalification program. This change will delete those references superseded by the revised rulemaking and incorporate those commitments made in the response.

The phrase "and Appendix 'A' of 10CFR55 and the supplemental requirements specified in Section A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees, and shall include familiarization with relevant industry operational experiences" is being deleted. The basis for the deletion is:

1. Appendix 'A' Requalification Program - has been deleted from 10CFR55. The requalification program is currently addressed under 10CFR55.59. PP&L has also committed to utilize the guidance of Regulatory Guide 1.8, Rev. 2 to fulfill the requalification requirement.
2. Reference to the March 28, 1980 NRC letter (Denton letter) has been deleted. NUREG-1262, "Answers to Questions at Public Meetings Regarding Implementation of 10CFR55 on Operator's Licenses," question #385 clearly stated, "the rule (10CFR55) supersedes and should include the requirements of the Harold Denton letter of March 28, 1980". Section A of Enclosure 1 of the Denton letter titled "Eligibility Requirements to be Administered an Examination" has been incorporated into Subpart D of 10CFR55 for licensed operators while Section C titled "Requalification Program" has been discussed above.

The response made commitments to the licensed operator requalification program only. Our other licensed operator training programs also meet or exceed 10CFR55 and the guidance of Regulatory Guide 1.8, Rev. 2.

NO SIGNIFICANT HAZARDS CONSIDERATIONS

- I. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

No. These changes are provided to clarify the training requirements of licensed operators. These changes delete those references superseded by revised rulemaking and



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incorporate commitments made in our response to the Notice of Violation. Therefore, the proposed change is purely administrative in nature and cannot involve an increase in the probability or consequences of an accident previously evaluated.

II. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

No. These changes are administrative in nature. See Item I above.

III. Does the proposed change involve a significant reduction in a margin of safety?

No. These change are administrative in nature. See Item I above.

IMPLEMENTATION

Since these Technical Specification Changes are part of an NRC Region I open item, PP&L requests that these proposed amendments be approved prior to December 1, 1990 in order to close out the open item.

Any questions on this submittal should be directed to Mr. R.D. Kichline at (215) 770-4181.

Very truly yours,



H. W. Keiser

Attachments

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

