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

SUBJECT: Responds to Generic Ltr 90-04, "Status of Licensee Implementation of GSIs."

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PP&L Pennsylvania Power & Light Company
Two North Ninth Street • Allentown, PA 18101-1179 • 215/770-5151

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

JUN 29 1990

Dr. Walter R. Butler, Director
Project Directorate I-2
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION
RESPONSE TO GENERIC LETTER 90-04 **Docket Nos. 50-387**
PLA- 3404 File R41-2 **50-388**

Dear Dr. Butler:

PP&L's response to Generic Letter 90-04 is attached. This represents our best effort to provide the information requested in the short time allotted. All references are applicable to both units unless otherwise noted. Attachment A summarizes status of Licensee Implementation of Generic Safety Issues. Attachment B (comments) provide a listing of references which address the respective Generic Safety Issue.

If you have any questions please contact Mr. Robert D. Kichline at (215) 770-4181.

Very truly yours,

H. W. Keiser

Attachment(s)

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

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ATTACHMENT A

FACILITY NAME: Susquehanna Units 1 & 2
DOCKET NO.: 50-387 & 50-388
LICENSEE: Pennsylvania Power & Light Co.

STATUS OF LICENSEE IMPLEMENTATION OF GENERIC SAFETY ISSUES

RESOLVED WITH IMPOSITION OF REQUIREMENTS OR CORRECTIVE ACTIONS

GSI/(MPA No.)	TITLE	APPLICABILITY	STATUS*	ATTACHMENT B COMMENTS
40 (B065)	Safety Concerns Associated With Pipe Breaks In The BWR Scram System	All BWRs	C/NC	1
41 (B058)	BWR Scram Discharge Volume Systems	All BWRs	C/NC	2
43 (B107)	Reliability Of Air Systems	All Plants	I	3
51 (L913)	Improving the Reliability of Open-Cycle Service Water Systems	All Plants	I	4
67.3.3 (A017)	Improved Accident Monitoring	All Plants	C	5
75** (B076)	Item 1.1 - Post-Trip Review (Program Description and Procedure)	All Plants	C	6,7
75 (B085)	Item 1.2 - Post-Trip Review - Data and Information Capability	All Plants	C	6,8

*Please follow attached guidance for completing this column.

**The 16 items listed for GSI 75 all relate to actions derived from the generic implications of Salem ATWS events. Item numbers correspond to Generic Letter 83-28 action item numbers.

GSI/(MPA No.)	TITLE	APPLICABILITY	STATUS*	ATTACHMENT B COMMENTS
75 (B077)	Item 2.1 - Equipment Classification and Vendor Interface (Reactor Trip System Components)	All Plants	NC	6,9
75 (B086)	Item 2.2.1 - Equipment Classification for Safety-Related Components	All Plants	C	6,10
75 (L003)	Item 2.2.2 - Vendor Interface for Safety-Related Components	All Plants	E	6,11
75 (B078)	Items 3.1.1 & 3.1.2 - Post - Maintenance Testing (Reactor Trip System Components)	All Plants	NC	6,12
75 (B079)	Item 3.1.3 - Post-Maintenance Testing-Changes to Test Requirements (Reactor Trip System Components)	All Plants	NC	6,13
75 (B087)	Items 3.2.1 & 3.2.2 - Post-Maintenance Testing (All Other Safety-Related Components)	All Plants	NC	6,12
75 (B088)	Item 3.2.3 - Post-Maintenance Testing-Changes to Test Requirements (All Other Safety-Related Components)	All Plants	NC	6,13
75 (B080)	Item 4.1 - Reactor Trip System Reliability (Vendor-Related Modifications)	All Plants	N/A	

ATTACHMENT B

GSI/(MPA No.)	TITLE	APPLICABILITY	STATUS*	COMMENTS
75 (B081)	Items 4.2.1 & 4.2.2 - Reactor Trip System Reliability-Maintenance and Testing (Preventative Maintenance and Surveillance Program for Reactor Trip Breakers)	All PWRs	N/A	
75 (B082)	Item 4.3 - Reactor Trip System Reliability - Design Modifications (Automatic Actuation of Shunt Trip Attachment for Westinghouse and B&W Plants)	All W and B&W Plants	N/A	
75 (B090)	Item 4.3 - Reactor Trip System Reliability - Tech Spec Changes (Automatic Actuation of Shunt Trip Attachment For Westinghouse and B&W Plants)	All W & B&W Plants	N/A	
75 (B091)	Item 4.4 - Reactor Trip System Reliability (Improvements in Maintenance and Test Procedures for B&W Plants)	All B&W Plants	N/A	

GSI/(MPA No.)	TITLE	APPLICABILITY	STATUS*	ATTACHMENT B COMMENTS
75 (B092)	Item 4.5.1 - Reactor Trip System Reliability-Diverse Trip Features (System Functional Testing)	All Plants	N/A	6
75 (B093)	Items 4.5.2 & 4.5.3 - Reactor Trip System Reliability - Test Alternatives and Intervals (System Functional Testing)	All Plants	C	6, 9, 14, 15
86 (B084)	Long Range Plan for Dealing with Stress Corrosion Cracking in BWR Piping	All BWRs	I	16
93 (B098)	Steam Binding of Auxiliary Feedwater Pumps	All PWRs	N/A	
99 (L817)	RCS/RHR Suction Line Valve Interlock on PWRs	All PWRs	N/A	
124	Auxiliary Feedwater System Reliability	ANO-1&2, Rancho Seco, Prairie Island 1&2, Crystal River-3 Ft. Calhoun	N/A	
A-13 (B017)	Snubber Operability Assurance - Hydraulic Snubbers	All Plants	N/A	

ATTACHMENT B

GSI/(MPA No.)	TITLE	APPLICABILITY	STATUS*	COMMENTS
A-13 (B022)	Snubber Operability Assurance - Mechanical Snubbers	All Plants	C/NC	17
A-16 (D012)	Steam Effects on BWR Core Spray Distribution	Oyster Creek & NMP-1	N/A	
A-35 (B023)	Adequacy of Offsite Power Systems	All Plants	NC	18
B-10	Behavior of BWR Mark III Containments	All BWR Mark III Plants	N/A	
B-36	Develop Design, Testing and Maintenance Criteria for Atmosphere Cleanup System Air Filtration and Adsorption Units for Engineered Safety Features Systems and for Normal Ventilation Systems	All Plants with OL Applications After 4/1/80	N/A	
B-63 (B045)	Isolation of Low Pressure Systems Connected to the Reactor Coolant System Pressure Boundary	All Plants	C	19

ATTACHMENT B

COMMENTS

1. - PP&L submitted its response to NUREG 0803 in PLA 928, dated September 17, 1981.

   - NRC incorporated this submittal as Unit #1, Amendment 5, License Condition 2.C.(18)(e).

   - PP&L's response to License Condition 2.C.(18)(e) was transmitted in PLA 2402, dated February 1, 1985.

   - License Amendment #37 deleted License Condition 2.C.(18)(e) and was dated April 19, 1985.

   - Changes for Unit 2 were made pre-licensing, therefore, no correspondence exists.

2. - PLA 751 transmitted PP&L's response to I.E. BULLETIN 80-14 on May 7, 1981.

   - The NRC subsequently issued License Condition 2.C.(17)(b), dated July 17, 1982.

   - NRC Inspection Report 50-387/82-19 and 50-388/82-08 closed IE Bulletin 80-14.

   - PLA 2470 closed License condition 2.C.(17)(b) and was dated May 20, 1985.

3. - PLA-3153 transmitted PP&L's response to Generic Letter 88-14, dated February 24, 1989.

   - A testing program is currently under development, and our final submittal will be made in the near future.

4. - PP&L responded to Generic Letter 89-13 via PLA 3349, dated February 23, 1990.

   - PP&L will submit a letter by December 13, 1992 confirming that all actions are complete.

5. - PP&L's position, with respect to Reg. Guide 1.97, was transmitted in PLA 965, dated November 13, 1981.

   - PP&L, via PLA 2222, responded to supplement 1 of NUREG 737 as required by Generic Letter 82-23 dated May 31, 1984.

   - NRC inspection report 50-387/388/90-06 reviewed the implementation of Reg. Guide 1.97, Rev. 2.

6. - PP&L responded to Generic Letter 83-28 via PLA 1827, dated November 4, 1983.

   - A revised response was submitted under PLA 2095, dated March 1, 1984.

7. - A safety evaluation, dated May 13, 1985, was issued to PP&L, thereby closing Item 1.1 of Generic Letter 83-28.

8. - A safety evaluation, dated June 10, 1985, closed out Item 1.2 of Generic Letter 83-28.

9. - A technical evaluation, dated December 1988, reviewed items 2.1 and 4.5.2 and considered PP&L's approach acceptable.

10. - A technical evaluation sent with a letter, dated November 30, 1989, reviewed items 2.2.1, and responses were considered acceptable.

11. - This issue is being readdressed in PP&L's response to Generic Letter 90-03, which will be submitted to the NRC by September 25, 1990.

12. - A staff safety evaluation, dated June 10, 1986, evaluated PP&L's response to Items 3.1.1, 3.1.2, 3.2.1, 3.2.2 and Item 4.5.1. All were considered acceptable.

13. - An evaluation, dated October 22, 1985, reviewed items 3.1.3 and 3.2.3 for both Units 1 and 2 and considered the responses acceptable.

14. Comments refer to Item 4.5.2 only.

   - PLA 2928, dated July 21, 1988, provided additional information needed to close this item.

15. Comments refer to Item 4.5.3 only.

   - PP&L formally endorsed the BWROG report (NEDC 30844) in PLA 2451, dated April 12, 1985.

   - A safety evaluation, dated June 21, 1989, considered Item 4.5.3 complete.

16. - PP&L responded to Generic Letter 88-01 via PLA 3060, dated August 10, 1988.

   - The response was revised in PLA 3136, dated February 13, 1989.

   - An additional response was submitted on August 18, 1989 (PLA 3233).

   - The final response was submitted in PLA 3263, dated October 2, 1989.

   - One unresolved item was identified by inspection report 388/89-28.

17. - PLA 1880 proposed an amendment to Tech. Specs Section 3/4.7.4, dated October 22, 1983.

    - NRC accepted this proposal under amendment #23, dated May 23, 1984.

    - This submittal was included in Unit 2 original Tech. Specs.

18. - This generic safety issue was addressed in response to FSAR question 40.6 and accepted by the NRC in NUREG 0776, Supplement 1, dated June 1981.

    - PP&L is currently reviewing this issue for the upcoming electrical distribution SSFI to be held between July 30, 1990 and August 31, 1990.

19. - PP&L proposed Amendment 15 to NPF-14 under PLA 1430, dated December 10, 1982 which was to amend Tech. Spec Section 3.4.3.2.

    - NRC issued Amendment 7 to NPF-14 on June 31, 1983 to amend the Tech. Spec.