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SUBJECT: Requests temporary waiver of compliance from requirements in Tech Specs 3.0.4 & 4.0.4.

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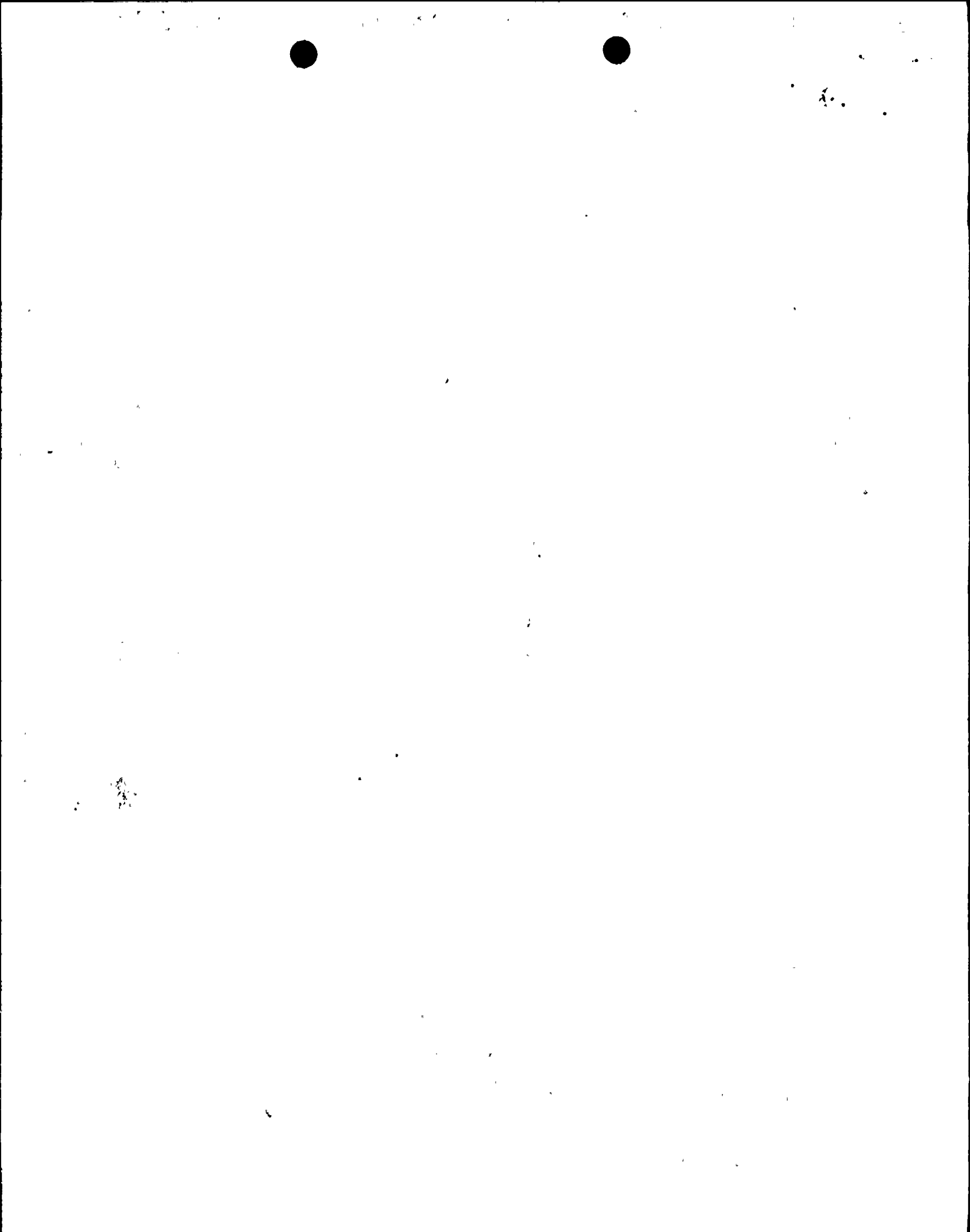
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Director of Nuclear Reactor Regulation
Attention: Dr. W. R. Butler, Project Director
Project Directorate I-2
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
Washington, DC 20555

SUSQUEHANNA STEAM ELECTRIC STATION
REQUEST FOR WAIVER -
SPECIFICATIONS 3.0.4 AND 4.0.4
PLA-3484 FILE A17-2, R41-2

Docket Nos. 50-387
50-388

Dear Dr. Butler:

The purpose of this letter is to request a temporary waiver of compliance from the requirements of the Susquehanna SES Units 1 and 2 Technical Specifications.

REQUIREMENTS FOR WHICH WAIVER IS REQUESTED

The Susquehanna SES Technical Specifications have been modified in accordance with NRC Generic Letter 87-09, "Sections 3.0 and 4.0 of the Standard Technical Specifications (STS) on the Applicability of Limiting Conditions for Operation and Surveillance Requirements. One of the problems specifically addressed by the letter was possible conflicts between Specifications 4.0.3 and 4.0.4. The Generic Letter states:

"A second conflict could arise because, when Surveillance Requirements can only be completed after entry into a mode or specified condition for which the Surveillance Requirements apply, an exception to the requirements of Specification 4.0.4 is allowed. However, upon entry into this mode or condition, the requirements of Specification 4.0.3 may not be met because the Surveillance Requirements may not have been performed within the allowed surveillance interval. Therefore, to avoid any conflict between Specifications 4.0.3 and 4.0.4, the staff wants to make clear: (a) that it is not the intent of Specification 4.0.3 that the Action Requirements preclude the performance of surveillances allowed under any exception to Specification 4.0.4; and (b) that the delay of up to 24 hours in Specification 4.0.3 for the applicability of Action

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Requirements now provides an appropriate time limit for the completion of those Surveillance Requirements that become applicable as a consequence of allowance of any exception to Specification 4.0.4."

PP&L has recently identified certain instruments that cannot be tested until after entry into an Operational Condition for which the Surveillance Requirements apply and do not have exceptions to the requirements to Specification 4.0.4 provided. They are:

Specification 3.3.1, Reactor Protection System Instrumentation

- Intermediate Range Monitors (IRMs)
- Average Power Range Monitors (APRMs) : Neutron Flux-Upscale, Setdown function only (15% Rated Thermal Power)

Specification 3.3.6, Control Rod Block Instrumentation

- APRMs : Neutron Flux - Upscale, Startup function only (12% Rated Thermal Power)
- Source Range Monitors (SRMs)
- IRMs

Specification 3.3.7.6, Source Range Monitors

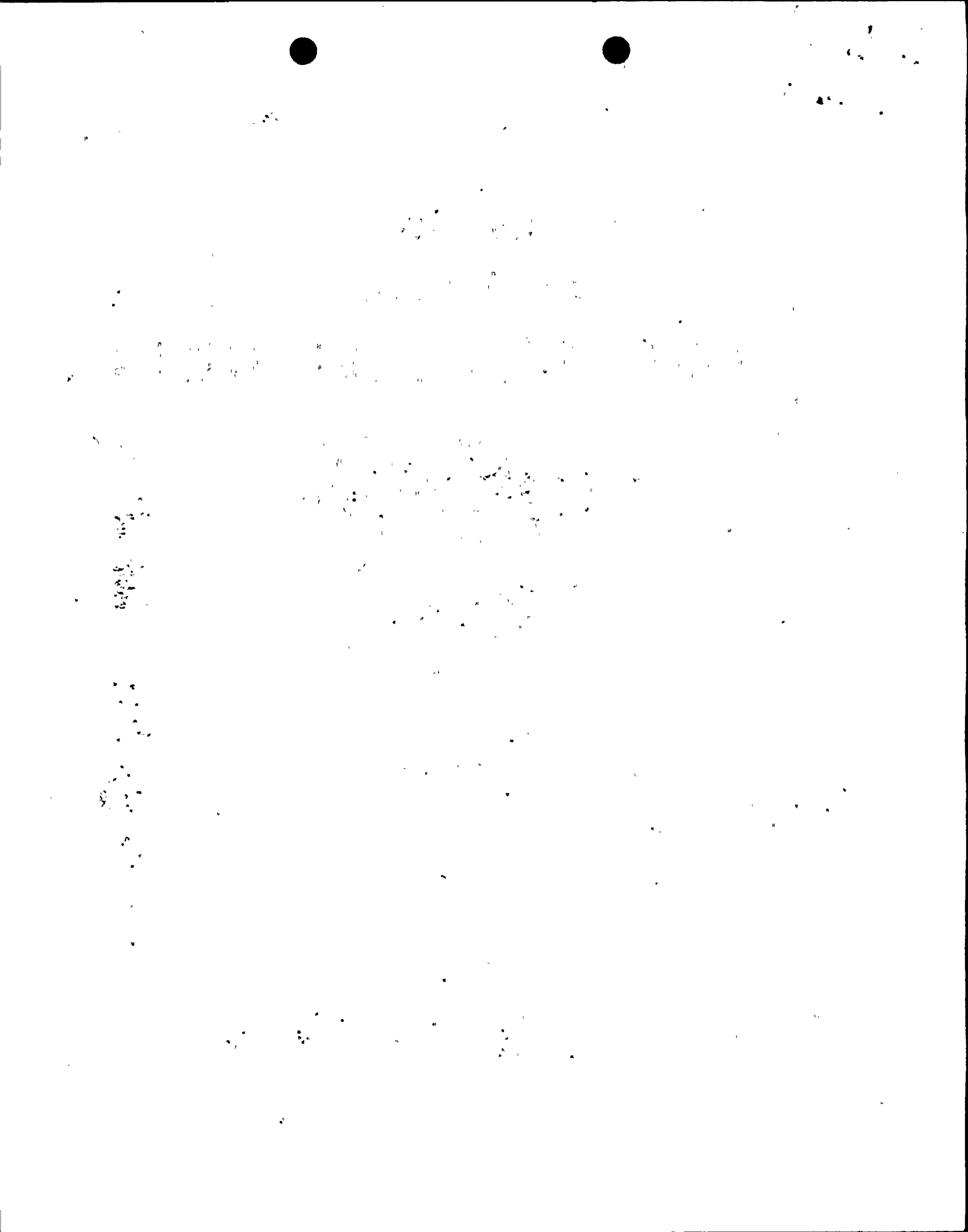
Also missing in each of these Specifications is an exception to Specification 3.0.4, which is necessary to allow a change in Operational Conditions when the Limiting Conditions for Operation are not being met.

Based on the above, PP&L is requesting a waiver from the requirements of Specifications 3.0.4 and 4.0.4 for each of the above Specifications in order to permit the use of the 24 hours provided by Specification 4.0.3 to perform the required surveillances.

CIRCUMSTANCES REQUIRING PROMPT ACTION

PP&L plans to shutdown each of the Susquehanna units in the near future to perform certain repairs. Unit 1 will tentatively be shutdown on December 2, 1990 and Unit 2 on December 15, 1990. Without the requested waiver, PP&L will be forced to shutdown the units without being in full compliance with the Technical Specifications.

This change could not be avoided because although it has been a problem since original licensing, it was not identified until some followup work was done after an internal audit that identified a similar concern on another system. Although an acceptable solution to that problem was developed without a waiver, such has not been the case for the problem in this request.



COMPENSATORY ACTIONS

PP&L will process a proposed amendment to the Technical Specifications to alleviate this concern permanently. It is our intent to request this change in time to support the next scheduled refueling and inspection outage (Unit 2 fourth, currently scheduled to shutdown on March 9, 1991).

SAFETY SIGNIFICANCE AND CONSEQUENCES OF PROPOSED REQUEST

In Operational Condition 1, the design of each of the above referenced instrument circuits prevents the performance of channel functional tests or calibrations due to interlocks with the reactor mode switch that bypass their respective scram or rod block function in Operational Condition 1. Furthermore, the SRMs and IRMs are fully withdrawn from the core in Operational Condition 1 (to prolong detector life), and therefore testing in this condition will not provide a useful indication of operability.

Clearly, it is important to perform these surveillances as soon as the plant is in a condition where the testing is feasible. The 24 hours provided via Specification 4.0.3 was expressly meant for this purpose per Generic Letter 87-09 and as stated in the Bases for 4.0.3:

"(A 24-hour allowance to permit a delay in implementing action requirements provides a time limit) for completing Surveillance Requirements that are applicable when an exception to the requirements of Specification 4.0.4 is allowed."

Alternatives explored to resolve this problem included declaring the equipment inoperable and entering the associated action statements, but PP&L does not believe that it is prudent for two reasons:

1. Such action may involve a willful violation of Specifications 3.0.4 and 4.0.4 now that this concern has been identified, and
2. The required actions force half scrams and rod blocks that unnecessarily increase the potential of a scram or otherwise restrict unit operation.

Given these factors, PP&L has chosen to propose this waiver to meet our immediate needs until a formal Technical Specification is submitted.



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With respect to Specification 3.0.4 specifically, PP&L recognizes that the staff may not require this exception based on statements in the Bases that indicate such an exception is required only for changes to "higher" operational conditions. However, since the subject instrumentation is required to perform its function in "lower" conditions (i.e. 2 and 3) PP&L believes that the intent of 3.0.4 would require an exception for these cases. Unless written confirmation from the NRC is received to the contrary, we will modify the Bases when we propose the permanent changes.

Based on the above information, the proposed waiver represents a safe and prudent action that poses no adverse consequences.

JUSTIFICATION FOR DURATION OF PROPOSED REQUEST

PP&L is proposing that the waiver remain in effect until the NRC acts on the forthcoming proposed amendment to the Technical Specifications. This is justified based on the lack of safety consequences associated with the waiver.

NO SIGNIFICANT HAZARDS CONSIDERATIONS

1. This proposal does not involve a significant increase in the probability or consequences of an accident previously evaluated. The action proposed is consistent with the way the units have been operated since they were licensed. It is important to note that the surveillances in question are not being performed because the instrumentation is believed to be inoperable. As stated in 87-09, "It is overly conservative to assume that systems or components are inoperable when a surveillance requirement has not been performed. The opposite is in fact the case; the vast majority of surveillances demonstrate that systems or components are in fact operable." As long as the instrumentation is tested per 4.0.3, it will be confirmed to be operable in a timely manner. Furthermore, testing prior to entry into the condition where the Surveillance is required simply cannot be performed without extraordinary activities (i.e. temporary modifications to the circuitry) that would increase the risk of a transient. Based on the above, the proposed action will not significantly increase the probability or consequences of an accident previously evaluated.
2. This proposal does not create the possibility of a new or different type of accident from any accident previously evaluated. Neither the operation nor the function of the subject instrumentation is proposed to be modified. Performance of a confirmatory, regular surveillance cannot create the possibility of a new or different event.



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3. This change does not involve a significant reduction in a margin of safety. As stated in 1. above, PP&L has no reason to believe that the subject instrumentation will not be confirmed to be operable once conditions are reached where surveillance testing can be performed. Furthermore, our only alternative upon shutting down the unit will be to negatively impact safety margin by forcing the unit to be placed in a condition (half-scrum) that increases the risk of an unwarranted transient.

ENVIRONMENTAL CONSEQUENCES

No change to the design basis of Susquehanna is being proposed due to this requested waiver. Therefore, no environmental consequences that have not been previously considered are anticipated.

CONCLUSION

Both Susquehanna units will be in non-compliance with the Technical Specifications (3.0.4 and 4.0.4) if they are taken from Operational Condition 1 to another Operational Condition without the requested waiver. Entry into actions as a result of this violation will require half-scrums and rod blocks which are unnecessary. Furthermore, restoration of the "inoperable" channels will require entry into 3.0.3 in order to perform the required surveillance testing. The violation and the entry into 3.0.3 will require PP&L to file a Licensee Event Report.

None of the above actions are warranted. Therefore, it is requested that the waiver be approved immediately in order to support the Unit 1 shutdown currently planned for December 2, 1990, and the Unit 2 shutdown currently planned for December 15, 1990. The waiver should be conditioned to remain effective until the NRC acts on PP&L's forthcoming amendment request to resolve these issues permanently.

Any questions on this request should be directed to Mr. J.M. Kenny at (215) 774-7904.

Very truly yours,



H. W. Keiser



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Dr. W. R. Butler

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