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SUBJECT: Forwards Proposed Amends 144 & 98 to Licenses NPF-14 & NPF-22, respectively. Amends change Tech Spec Surveillance Requirement 4.7.4 re snubber visual insp intervals, per Generic Ltr 90-09.

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Director of Nuclear Reactor Regulation
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Project Directorate I-2
Division of Reactive Projects
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Washington, D.C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION
PROPOSED AMENDMENT NO. 144 TO LICENSE NO. NPF-14
AND PROPOSED AMENDMENT NO. 98 TO LICENSE NO.
NPF-22: CHANGES TO THE SSES UNITS 1 & 2 TECHNICAL
SPECIFICATIONS RELATING TO SNUBBER VISUAL
INSPECTION INTERVALS
PLA-3557 FILE A17-2, R41-2

Docket Nos. 50-387
50-388

Dear Mr. Butler:

The purpose of this letter is to propose changes to the Susquehanna SES Unit 1 and 2 Technical Specifications.

Background

Technical Specification Surveillance Requirement 4.7.4 requires each snubber to be demonstrated operable by performance of an augmented inservice inspection (ISI) program. The complementary/supporting portion of this ISI program is the visual inspection of each type of snubber. Currently, this technical specification specifies a schedule to accomplish these snubber visual inspections based on the number of inoperable snubbers found during the previous visual inspection irrespective of the size of the snubber population.

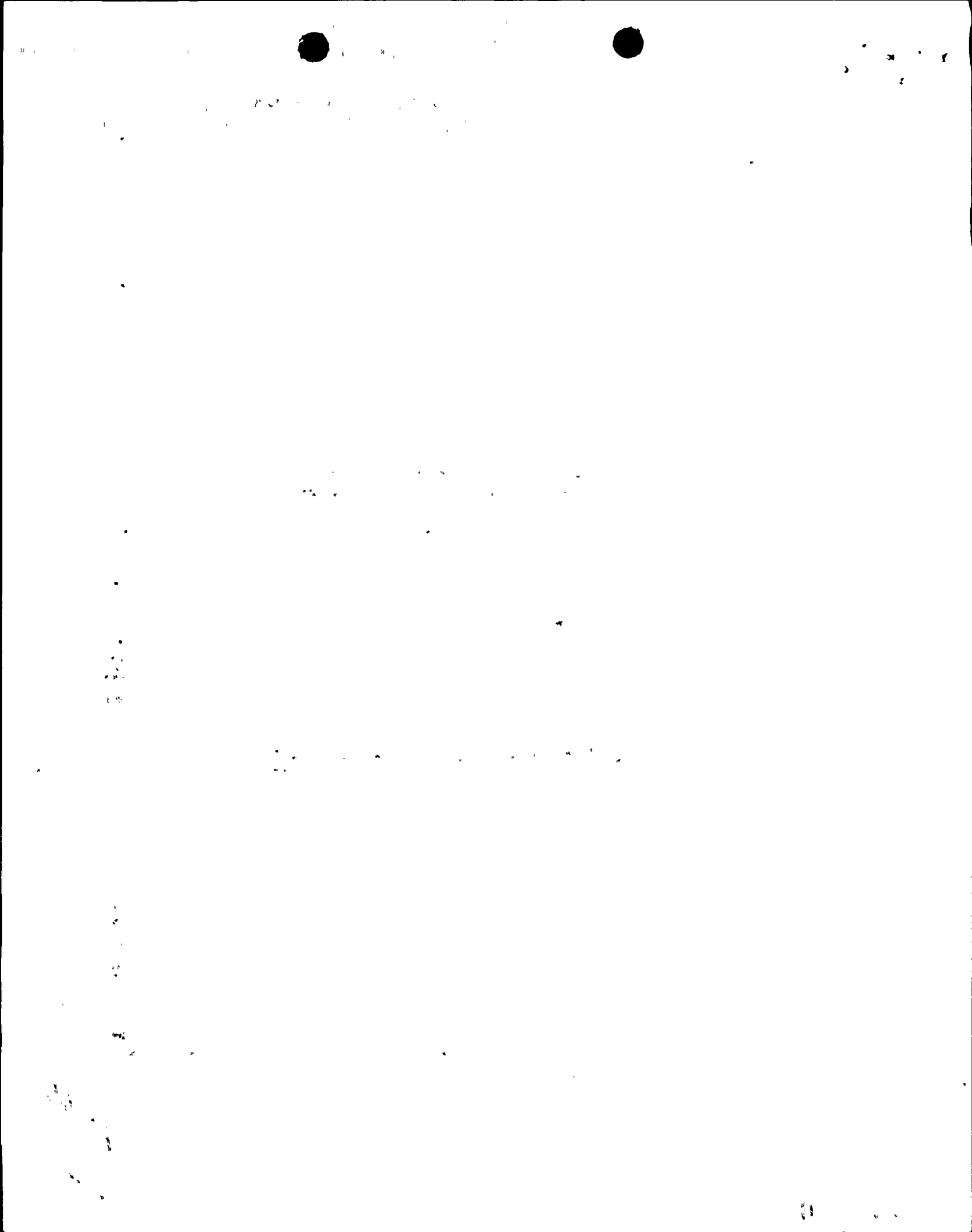
Generic Letter 90-09 provides an alternate method for determining the next interval for the visual inspection of snubbers based upon the number of unacceptable snubbers found during the previous inspection, the total population or category size for each snubber type, and the previous inspection interval.

Description of Change

PP&L is proposing to revise the visual inspection portion of Specification 4.7.4 as suggested in Generic Letter 90-09 and incorporate the applicable portions of Enclosure B of that Generic Letter.

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~~ADCK~~



It should be noted that the current Unit 1 and Unit 2 requirements are different due to differences at the time each unit was licensed. The proposed changes will make the visual inspection requirements identical. The Technical Specification Bases are revised to reference the Generic Letter. See attached marked-up pages.

Safety Analysis

Technical Specification 4.7.4 imposes surveillance requirements for visual inspection and functional testing of all safety-related snubbers. Functional testing at Susquehanna SES provides a 95 percent confidence level that 90 to 100 percent of the snubbers operate within the specified acceptance limits. No changes to the functional testing requirements are being proposed at this time. The performance of visual examinations is a separate process that complements the functional testing program and provides additional confidence in snubber operability.

As stated in the Generic Letter, the Commission has reviewed this issue as part of its improvements policy statement and has developed an alternate schedule for visual inspections that maintains the same confidence level as the existing schedule and generally will allow the licensee to perform visual inspections and corrective action during plant outages. This alternate method is based upon the number of unacceptable snubbers found during the previous inspection, the total population or category size for each snubber type, and the previous inspection interval.

Visual inspection activities at Susquehanna SES fully support the proposed tech spec change. As evidenced during Unit 1's past two outages, 4 snubbers during the 4th RIO and 9 snubbers during the 5th RIO were visually determined to be unacceptable. All were successfully functionally tested in the as found condition, and reclassified as acceptable. To date, only two snubbers (1 per unit) have failed the functional test after visually being identified as a potential failure.

Based on the above, the reliability of the safety function of the snubbers installed at Susquehanna will not be adversely impacted for the following reasons:

1. Functional testing requirements provide a high confidence level and remain unchanged,
2. The additional confidence provided through visual testing (for which we have experienced favorable results) is not proposed to be reduced, and
3. The potential for unnecessary radiation exposure due to the current Technical Specification requirements is reduced.

No Significant Hazards Considerations

- I. This proposal does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The performance of visual examinations is a separate process that complements the functional testing program and provides additional confidence in snubber operability. Changing the inspection interval to enhance ALARA will not cause nor effect the results of an accident previously evaluated.

- II. This proposal does not create the possibility of a new or different type of accident from any accident previously evaluated.

Neither the design, installation, function nor operation of a snubber is proposed to be modified. Providing an alternate visual inspection interval will not create the possibility of a new or different event.

- III. This change does not involve a significant reduction in a margin of safety.

Functional testing of snubbers remains the basis for the established margin of safety. The proposed schedule for visual inspection will not impact the confidence level provided by functional testing. Furthermore, it generally will allow performance of visual inspections and corrective actions during plant outages, thereby reducing unnecessary radiation exposure.

Based on the above, the change will not significantly reduce existing safety margin.

Environmental Consequences

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

Implementation

Timely review of this proposed change is requested. The proposed amendment is consistent with the guidance provided in Generic Letter 90-09, dated December 11, 1990. This amendment may be characterized as effective upon issuance.

Any questions on this request should be directed to Mr. A. K. Maron at (215) 774-6536.

Very truly yours



H. W. Keiser

Attachment

cc: ~~NRC Document Control Desk (original)~~
NRC Region I
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Mr. G. S. Barber, NRC Sr. Resident Inspector
Mr. T. M. Gerusky, PA DER