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

SUBJECT: Documents util position on taking credit for fusing open
 cable connectors before contacts weld-shut & function of
 Class 1E Westinghouse circuit breaker auxiliary switch
 contacts & Namco limit switch contacts.

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Harold W. Keiser
Senior Vice President-Nuclear
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APR 26 1991

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
CLASS 1E/NON 1E ISOLATION-WELDED
CONTACT ISSUE
PLA-3535 FILES R41-2, A28-3B

Docket Nos. 50-387
and 50-388

Dear Dr. Butler:

On January 30, 1991, PP&L received a telephone call from your Staff concerning our position on taking credit for the fusing open of cable conductors before contacts weld shut and affect the safety function of Class 1E Westinghouse circuit breaker auxiliary switch contacts and Class 1E Namco limit switch contacts for the long term. The NRC Staff stated that PP&L's position would not be acceptable. The Staff requested that PP&L re-evaluate its position for these breakers and limit switches. This letter documents PP&L's position. PP&L's position as stated in this letter is acceptable to the NRC staff and closes this issue.

As a result of the re-evaluation PP&L will use contacts from the 4KV circuit breaker drawout position switches instead of the mechanically operated switches. Only computer inputs will be connected to the drawout switches. In the event a drawout switch contact welds shut, the 4KV circuit breaker can still change position when required. Thus, the class 1E 4KV circuit breakers will meet their performance requirements even with a welded shut drawout switch contact. This change is needed for the following Class 1E Westinghouse circuit breakers:

- Preferred incoming supply circuit-breakers.
- Alternate incoming supply circuit breakers.
- Diesel generator circuit breakers.

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- ESW pump circuit breakers.
- RHR pump circuit breakers.
- Control structure chiller circuit breakers.

The re-evaluation of the remaining Class 1E circuit breakers showed that these circuit breakers will meet their minimum performance requirements with welded shut auxiliary switch contacts.

The Class 1E Namco limit switches used for computer inputs are used for alarm and indication only. The contacts from these devices are not used in Class 1E circuits. Therefore, welded shut computer input contacts do not effect Class 1E circuits.

SEA-EE-183 and SEA-EE-184 will be revised to document the above re-evaluation.

The modifications for the Unit 1 and common circuits will be installed prior to startup following the Sixth Refueling and Inspection Outage (scheduled to begin in March 1992). The Unit 2 circuits will be modified prior to startup following the Fifth Refueling and Inspection Outage (scheduled to begin in September 1992).

Also, PP&L will revise the FSAR as requested. The FSAR revision will be submitted by August 31, 1991.

If you have any questions, please contact Mr. C.T. Coddington at (215) 774-7915.

Very truly yours,



H. W. Keiser

Attachments

cc: ~~Document Control Desk~~(original)
NRC Region I
Mr. G.S. Barber, NRC Sr. Resident Inspector
Mr. J.J. Raleigh, NRC Project Manager



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