Pennsylvania Power & Light Company
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Harold W. Keiser
Senior Vice President–Nuclear
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DEC 0 2 1991

Mr. L. H. Bettenhausen, Chief
Operations Branch
Division of Reactor Safety
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

SUSQUEHANNA STEAM ELECTRIC STATION
RESPONSE TO EOP UNRESOLVED ITEMS
(387/91-09; 388/91-09)
PLA-3687 FILE R41-2

Docket Nos. 50-387
50-388

Dear Mr. Bettenhausen:

This letter provides Pennsylvania Power & Light Company's response to the Unresolved Items identified in NRC Combined Inspection Report 50-387/91-09 and 50-388/91-09 dated September 25, 1991.

The notice required submittal of a written reply within sixty (60) days of receipt of the letter. We trust that the commission will find the attached response acceptable.

Very truly yours,

H. W. Keiser

Attachment

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

9112060197

RESPONSE TO UNRESOLVED ITEMS

UNRESOLVED ITEM (387/91-09-01; 388/91-09-01)

Several of the deviations taken from the BWROG EPGs for RPV Pressure Control do not have adequate technical justification. The deviation taken in the SSES EPGs to open the MSIVs under less restrictive conditions than permitted by the BWROG EPGs has the potential to be an unreviewed safety question. The technical adequacy of the SSES EPG RPV Pressure Control Guidelines is considered an unresolved item.

Response

This unresolved item pertains to three (3) sections of the RPV Control pressure guideline EPG and EO-100/200-102:

a. *The SSES EPGs specify depressurization of the RPV to 150 psig within one hour following a Station Blackout Event regardless of reactor power or control rod position. The BWROG EPGs only allow depressurization of the RPV in the RC/P control guideline if the reactor is shutdown.*

   SSES EPG and EO-100/200-102 will be revised during upgrade to EPG Rev. 4 to modify steps which presently allow depressurization of a critical reactor. EOP upgrade to EPG Rev. 4 will be completed by 1/31/93.

b. *The SSES EPGs contain an override to rapidly depressurize using the BPVs or the SRVs if Emergency Depressurization is anticipated. The basis (per EPG Rev 3) for rapidly depressurizinq using the BPVs when Emergency Depressurization is anticipated is to reject the heat to the main condenser in preference to the primary containment. The justification for allowing SRV usage in addition to BPVs when depressurizing in anticipation of emergency depressurization does not provide justification for depressurizing to the primary containment via the SRVS.*

   The deviation is based on EPG Rev. 3 Caution #17 allowance for cooldown rates above 100°F/hr to conserve RPV water inventory, protect primary containment integrity, or limit radioactive release to the environment. Caution #17 does not specify which method to utilize in cooling down the RPV at greater than 100°F/hr. Main turbine bypass valves, when available, are one means to meet this intent; SRVs are another.

PP&L EOPs are written to EPG Rev. 3. PP&L recognizes EPG Rev. 4 does not implement the intent of Caution #17 the same way EPG Rev 3 does, therefore, PP&L intends to submit this issue as an item for discussion at the January BWROG EPC meeting. Following evaluation by the EPC, PP&L will decide whether or not to pursue allowing use of SRVs when anticipating Emergency Depressurization. PP&L will resolve this issue as part of the EOP upgrade to EPG Rev. 4 (1/31/93).

c. *The SSES EPGs provide direction to bypass interlocks and to open the MSIVs if the main condenser is available and there is no indication of gross fuel failure or a main steam line break. This is a deviation from the BWROG EPGs which direct this action if the above criteria are met and boron injection is required.*

PP&L is in the process of enhancing lower tier documents which deal with loss of main condenser, and therefore, no longer needs to retain this deviation from BWR EPG guidance. SSES-EPG and EO-100/200-102 is presently in the revision process to include the additional BWR EPG condition of ATWS. This procedure will be revised by March 30, 1992.

UNRESOLVED ITEM (387/91-09-02; 388/91-09-02)

The licensing's methodology for determining maximum normal and maximum safe operating radiation levels has no correlation to the BWROG EPG definition for maximum normal operating values and for maximum safe radiation levels. The maximum normal and maximum safe radiation levels determined using this methodology appear to be nonconservative with respect to personnel access. The technical adequacy of the maximum normal and maximum safe operating radiation levels for use in Secondary Containment Control is considered an unresolved item.

Response

PP&L will evaluate available secondary containment radiation survey data and ARM alarm setpoint values in order to re-define the maximum normal radiation values. In addition, PP&L will develop a method to incorporate personnel access requirements to secondary containment as a factor in the basis for the maximum safe radiation values.

This evaluation will be completed on a schedule to support the EOP upgrade to EPG Rev. 4 (1/31/93).

UNRESOLVED ITEM (387/91-09-03; 388/91-09-03)

The licensee's justification for deleting the Secondary Containment Control Water Level Control guidelines is not technically adequate. The basis for the justification is that flooding in the reactor building will be accompanied by high temperature and radiation levels and, therefore, control of secondary containment water level is an event based response. This justification is contrary to the bases for symptom based procedures. The licensee does not describe any negative aspects to entering Secondary Containment Control in response to high water levels in secondary containment. The technical adequacy of the deletion of Secondary Containment Water Level Control Guidelines is considered an unresolved item.

Response

PP&L has evaluated the need for secondary containment water level control guidance in addition to that already provided by ON-120/220-001 and has concluded it is appropriate to include secondary containment water level control guidance in the procedures.

PP&L intends to incorporate this guidance during the EOP upgrade to EPG Rev. 4 (1/31/93).

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KEISER,H.W. Pennsylvania Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
BETTENHAUSEN,L. Region 1 (Post 820201)

SUBJECT: Responds to NRC 910925 ltr re EOP unresolved items noted in Insp Repts 50-387/91-09 & 50-388/91-09.Corrective actions: method will be developed to incorporate personnel access requirements & alarm setpoint values evaluated.

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IE01

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