UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO.121TO FACILITY OPERATING LICENSE NO. NPF-14

AMENDMENT NO. 89 TO FACILITY OPERATING LICENSE NO. NPF-22

PENNSYLVANIA POWER & LIGHT COMPANY

ALLEGHENY ELECTRIC COOPERATIVE, INC.

SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2

DOCKET NOS. 50-387 AND 388

1.0 INTRODUCTION

By letter dated August 16, 1991 and supplemented by letter dated May 29, 1992, the Pennsylvania Power and Light Company and Allegheny Electric Cooperative, Inc. (the licensees) submitted a request for changes to the Susquehanna Steam Electric Station (SSES), Units 1 and 2, Technical Specifications (TS). The requested changes would revise the Technical Specification 4.6.1.2.a and the associated bases to incorporate an exemption to appendix J of 10 CFR part 50 that removes the requirement that the third Type "A" Overall Integrated Containment Leakage Rate test required in each 10-year service period is to be conducted at the 10-year inservice inspection interval. The May 29, 1992 supplemental letter did not change the initial proposed no significant hazards consideration.

2.0 EVALUATION

Technical Specification Surveillance Requirement 4.6.1.2.a states: "Three Type A Overall Integrated Containment Leakage Rate tests shall be conducted at 40 ± 10 month intervals during shutdown, at P_a 45.0 psig, during each 10-year service period. The third test of each set shall be conducted during the shutdown for the 10-year plant in-service inspection."

This requirement is in compliance with Appendix J of 10 CFR Part 50, Section III.D.1(a), which states that a set of three Type A tests shall be performed at "approximately equal intervals during each 10-year service period" with the third test of each set conducted when the plant is shutdown for the 10-year in-service inspections (ISI).

With a current operating cycle of 18 months, integrated leak rate testing (ILRT) is required every other outage (nominally 36 months) to meet the 40 ± 10 month interval. Because this test schedule does not match up exactly with the 10 year ISI outage, back-to-back ILRTs would have to be performed in back-to-back outages.

The 10 CFR Part 50, Appendix J requirements provide for periodic verification by tests of the leak-tight integrity of the primary reactor containment, and systems and components which penetrate the primary containment, and establish the acceptance criteria for these tests. The purposes of these tests are to assure that (1) leakage through the primary containment, and systems and components penetrating primary containment do not exceed allowable leakage rates specified in the Technical Specifications and associated Bases, and (2) periodic surveillance of primary containment penetrations and isolation valves is performed so that proper maintenance and repairs are made during the service life of the containment, and systems and components penetrating primary containment.

The ASME Boiler and Pressure Vessel Code, Section XI, provides requirements for the inservice inspection and test of ASME Code Class 1, 2 and 3 components, pumps, and valves. These component inspections, inservice tests for verifying operational readiness of pumps and valves whose function is required for safety, and piping system pressure tests, conducted at the 10-year intervals, comply with the requirements of 10 CFR 50.55a(g).

The requirement to perform the third Type A ILRT concurrent with the 10-year ISI stems from the 10 CFR Part 50, Appendix J. The apparent basis for coupling the two types of tests is to assure that three Type A tests are not grouped together during the first 90 months of each 10-year operating cycle.

Based upon the evaluation provided above, the change will not affect the safe operation of SSES since it does not reduce any requirement for primary containment integrity as imposed by the Technical Specifications or 10 CFR Part 50, Appendix J, nor any 10-year ISI requirements as imposed by Section XI of the ASME Code and 10 CFR 50.55a(g).

In conjunction with the exemption to Appendix J, it eliminates unnecessary testing in successive plant outages while providing the desired level of testing as required by the Technical Specifications and 10 CFR Part 50, Appendix J. The change affects the scheduling of only one of the three Type A tests during each 10-year service period. The scheduling and performance of the remaining tests would not be affected. The manner in which the Type A tests are performed and the applicable acceptance criteria would remain unchanged. The 10 CFR Part 50, Appendix J requirements will continue to be met with an exception to the schedular requirements of Section III.D.1(a).

By letter dated May 29, 1992, the licensees requested a withdrawal of a portion of the proposed changes. PP&L requested that the Technical Specification 4.6.1.2a testing frequency remain 40 $\pm$ 10 months and we find this acceptable. A Notice of Partial Withdrawal will be published in the Federal Register.

Summary

The staff considers the requirement that the third type "A" test occur during the 10-year ISI outage to be of minimal safety significance when compared to

the actual interval between tests. The licensees proposal maintains an appropriate interval between tests for ensuring containment leakage integrity. Further it should be noted that the staff has proposed a revision to Appendix J, Section III.D.1(a) regarding Type "A" test frequency (51 FR 39538) that would eliminate the requirement that the third Type "A" test per 10-year service period coincide with the 10-year ISI interval. The staff therefore finds the requested exemption and associated technical specification changes to be acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Pennsylvania State official was notified of the proposed issuance of the amendments. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes the surveillance requirements. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (56 FR 43812). Accordingly, the amendments meet eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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Date: June 24. 1992