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 AUTH. NAME AUTHOR AFFILIATION
 KEISER, H.W. Pennsylvania Power & Light Co.
 RECIPIENT NAME RECIPIENT AFFILIATION
 MILLER, C.L. Project Directorate I-2

SUBJECT: Informs of deviations from emergency procedure guidelines & request concurrence for use. Listed deviations meet intent of EPGs, but based on plant-specific analyses, recommended actions differ.

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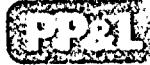
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Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101-1179 • 215/774-5151

Harold W. Keiser
Senior Vice President-Nuclear
215/774-4194

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Director of Nuclear Reactor Regulation
Attention: Mr. C. L. Miller, Project Director
Project Directorate I-2
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION
DEVIATION FROM EPG, REVISION 4
PLA-3828 FILE R41-2

Docket Nos. 50-387
and 50-388

Dear Mr. Miller:

Consistent with NRC expectations, PP&L is in the process of revising the Susquehanna SES Emergency Operating Procedures (EOPs) to reflect Revision 4 of the BWROG Emergency Procedure Guidelines (EPGs). In the process of evaluating our current EOPs against the new guidelines, PP&L has determined that for Susquehanna, it makes sense to retain certain strategies. These strategies were the result of Susquehanna-specific analyses performed by qualified PP&L personnel. It is our belief that they are consistent with the intent of the Rev. 4 EPGs. However, since our analyses require different actions, they technically represent deviations. Based on past discussions with the NRC, PP&L has chosen to notify you of these deviations and request your concurrence for their use. An overview of the subject strategies is provided below.

- o Water Level Control: the Rev. 4 EPG strategy is to control water level to adequately cool the core and minimize suppression pool heating, and to promote boron mixing. To accomplish this, the BWROG recommends lowering water level to between Top of Active Fuel (TAF) and the Minimum Steam Cooling Water Level (MSCWL).

For Susquehanna, PP&L has determined that water level should be controlled at -110 inches, approximately 4 feet above TAF. This deviation was previously brought to the attention of the NRC during PP&L's transition to Revision 3 of the EPGs.

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- o HPCI Operation during Emergency Depressurization: the Rev. 4 EPG strategy does not take credit for the HPCI controller, compensating for a reduction in RPV backpressure during depressurization.

For Susquehanna, PP&L has determined that HPCI controller performance will be sufficiently reliable to continue HPCI operation during depressurization. Should the controller not function reliably, our strategy would be consistent with the Rev. 4 EPG strategy.

- o RPV Depressurization at the Heat Capacity Temperature Limit (HCTL): One of the cases during which the Rev. 4 EPG strategy requires RPV depressurization is when the HCTL (or the HCTL segment of the Pressure Suppression Pressure) is encountered. This is based on ensuring that there is sufficient heat capacity in the suppression pool to receive the sensible energy stored in the RPV, RPV internals, fuel, and coolant without the pressure in the containment exceeding the vent opening pressure for all BWR containment designs (i.e., Mark I, II, and III).

For Susquehanna, PP&L has determined that the use of the HCTL is overly conservative and has the potential to result in premature blowdown during an ATWS; the BWROG is reviewing this position to determine if a revision to the EPGs is warranted.

PP&L wants to reiterate that the above deviations meet the intent of the BWROG Rev. 4 EPGs, but based on plant-specific analyses, the recommended actions differ. We would not expect these analyses to be representative of all BWRs.

For your information, PP&L plans to brief NRC Region I personnel on these strategies in order to ensure agreement on how operator performance will be reviewed.

Very truly yours,



H. W. Keiser

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