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 AUTH. NAME AUTHOR AFFILIATION
 KEISER, H.W. Pennsylvania Power & Light Co. *See proposed change*
 RECIP. NAME RECIPIENT AFFILIATION *To see spec.*
 MILLER, C.L. Project Directorate I-2 *See Rpt.*

SUBJECT: Proposes changes to Susquehanna SES Unit 1 & 2 TS & forwards proposed amend to license NPF-22 & NPF 14 & COLR.

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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

DEC 18 1992

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
PROPOSED AMENDMENT 155 TO
LICENSE NO. NPF-14 AND
PROPOSED AMENDMENT NO. 110
TO LICENSE NO. NPF-22:
REMOVAL OF CYCLE SPECIFIC PARAMETER
LIMITS FROM THE SSES UNITS 1 & 2
TECHNICAL SPECIFICATIONS
PLA-3892 FILES A7-8C/A17-2//R41-2**

Docket Nos. 50-387
and 50-388

Dear Mr. Miller:

The purpose of this letter is to propose changes to the Susquehanna SES Unit 1 and 2 Technical Specifications. Specifically, utilizing the guidance provided in Generic Letter 88-16 ("Removal of Cycle-Specific Parameter Limits from Technical Specification"), PP&L is proposing to remove cycle specific parameter limits from the existing Technical Specifications and placed them in a Core Operating Limits Report (COLR).

Background

A number of Technical Specifications (TS) address limits associated with reactor physics parameters that generally change with each reload core, requiring the processing of changes to TS to update these limits each fuel cycle. These limits are developed using an NRC-approved methodology documented in an approved Topical Report.

Generic Letter 88-16 states that processing of TS changes that are developed using an NRC-approved methodology is an unnecessary burden on both the licensee and the NRC resources. Further, as a consequence, the NRC review of the proposed changes to TS for these limits is primarily limited to confirmation that updated limits are calculated using an approved methodology and are consistent with all applicable limits of the safety analysis.

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Description of Change

PP&L is proposing to utilize the guidance provided in Generic Letter 88-16 and relocate the cycle specific parameter limits which change with each reload core to a Core Operating Limits Report. This COLR will be developed for each operating cycle utilizing PP&L's NRC-approved methodology.

In addition, NRC Generic Letter 90-02 Supplement 1, "Alternative Requirements for Fuel Assemblies in the Design Features Section of Technical Specifications," provides guidance with respect to the acceptability of reconstitution of fuel assemblies for fuel performance reasons. This Generic Letter provides a proposed line item improvement to the Design Features Section Fuel Assemblies discussion and has been incorporated into these proposed changes.

Safety Analysis

These changes are administrative in nature. There are no safety-related elements of these changes because they only relocate (not change) the NRC approved U1C7 and U2C6 cycle specific parameter limits from the Technical Specifications and place them in a separate controlled document, the COLR. The remedial actions/surveillance requirements associated with the various cycle specific parameter limits are unchanged and remain in their respective Technical Specifications.

Future cycle specific parameter limits will be documented in a Core Operating Limits Report developed specifically for that operating cycle in accordance with an approved program (proposed Section 6.9.3) which is based on the 50.59 process. This process will determine whether or not changes to these limits require NRC approval prior to their implementation.

The proposed changes to the Design Features Section extends the Generic Letter 88-16 philosophy regarding review of reload specific submittals that are developed using an NRC approved methodology to the fuel and control rod assemblies in terms of NRC approved designs or designs analyzed with applicable NRC approved methodologies.

This line item improvement follows the guidance provided in Generic Letter 90-02 and does not result in any changes to the operation or configuration of any plant components. Fuel reconstitution of an approved design with similar rods does not represent an unreviewed safety question. Based on the above discussion, the proposed changes have no adverse impact on safety. They will relieve an existing NRC and licensee resource burden (i.e., processing of a license amendment) by ensuring that all changes are based on NRC-approved methods and consistent with all applicable limits in the approved safety analysis.



NO SIGNIFICANT HAZARDS CONSIDERATIONS

1. This request does not involve a significant increase in the probability or consequences of an accident previously evaluated.

These changes are administrative in nature and do not change, only relocate, the approved U1C7 and U2C6 cycle specific parameter limits to a separate controlled document (the COLR). The plant will continue to operate under these approved cycle specific parameter limits and in accordance with the proposed Administrative Controls of Section 6.9.3. These controls ensure that all proposed changes are based on NRC approved methods and consistent with all applicable limits in the approved safety analysis. Therefore, the proposed change does not significantly increase the probability or consequences of an accident previously evaluated are anticipated.

2. This request does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Relocation of cycle specific parameter limits from the Technical Specifications to the Core Operating Limits Report is an administrative change and cannot affect the probability or consequences of analyzed events nor can it create a new event.

3. The proposed change does not involve a significant reduction in a margin of safety.

For the reasons described in 1 & 2 above, the proposed action only is transferring these limits from one document to another. No change to the approved U1C7 and U2C6 cycle specific parameter limits or the associated remedial actions/surveillance requirements is being proposed. In the future, proposed changes will only be implemented without prior NRC approval after they are confirmed to be based on NRC approved methods and consistent with all applicable limits in the approved safety analysis. This will ensure that a margin of safety will not be significantly impacted.

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

PP&L is requesting that this Technical Specification Amendment request be conditioned to become effective 90 days after NRC approval in order to allow appropriate programmatic/procedure changes to be implemented.

Any questions on this proposal should be directed to Mr. A.K. Maron at (215) 774-7852.

Very truly yours,



H. W. Keiser

Attachments

cc: NRC Document Control Desk (original)
NRC Region I
Mr. G. S. Barber, NRC Sr. Resident Inspector - SSES
Mr. R. J. Clark, NRC Sr. Project Manager - Rockville
Mr. W. P. Dornsife, Pennsylvania DER

