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 50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylv 05000388
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 BYRAM, R.G. Pennsylvania Power & Light Co.
 RECIPIENT NAME RECIPIENT AFFILIATION
 MILLER, C.L. Project Directorate I-2

SUBJECT: Forwards Proposed Amends 161 & 114 to Licenses NPF-14 & NPF-22, respectively, revising rept requirement of semiannual radioactive effluent release rept from semiannual to annual.

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Pennsylvania Power & Light Company

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Robert G. Byram
Senior Vice President-Nuclear
215/774-7502

JUN 01 1993

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 161 TO LICENSE NO. NPF-14 AND
PROPOSED AMENDMENT 114 TO LICENSE NO. NPF-22 :
REVISE THE REPORTING REQUIREMENT OF THE
SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT
FROM SEMIANNUAL TO ANNUAL
PLA-3981**

FILES A17-2/R41-2

Docket Nos. 50-387
& 50-388

Dear Mr. Miller:

The purpose of this letter is to transmit a proposed amendment to the Susquehanna SES Unit 1 and Unit 2 Technical Specifications. The proposed change reflects a change to the reporting frequency of the Semiannual Radioactive Effluent Release Report from semiannual to annual pursuant to 10 CFR 50.36a.

BACKGROUND

On August 31, 1992, the Nuclear Regulatory Commission (NRC) placed a notice in the Federal Register (57 FR 39353) regarding several amendments to their regulations. Specifically, 10 CFR 50.36a was one of the regulations revised whereby the frequency of reporting the quantity of each of the principal radionuclides released to unrestricted areas in liquid and in gaseous effluents was changed from semiannual to annual. Such action was taken by the NRC in response to a Presidential memorandum requesting that selected Federal agencies review and modify regulations that would eliminate any unnecessary burden of governmental regulation and insure that the regulated community is not subject to duplicative or inconsistent regulation.

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DESCRIPTION OF CHANGE

The attached marked-up changes for both units to Technical Specification Sections 3.3.7.10, 3.3.7.11, 3.12.1.c, 3.12.2.b, 6.9.1.8, 6.13.2.1 and 6.14.2.1 reflect the change to the Radioactive Effluent Release Report from semiannual to annual. Sections 6.9.1.8 (both units) also reflects a change to the submittal date of the report from 60 days to 90 days (from January 1).

SAFETY ANALYSIS

The proposed changes to the technical specifications will allow for the implementation of the new 10 CFR 50.36a reporting requirement. The proposed changes are administrative in nature and will not reduce the level of radiological control at SSES. Compliance with applicable regulatory requirements governing radioactive effluents, radiological environmental monitoring, and solid wastes, including 10 CFR 20, Appendix I to 10 CFR 50, 10 CFR 61, 10 CFR 71, and 40 CFR 190, will continue to be maintained.

The reporting of the quantity of effluent releases is currently performed at SSES on a semiannual basis in accordance with the Semiannual Radioactive Effluent Release Report requirement contained in the Susquehanna Unit 1 and Unit 2 Technical Specifications. To satisfy the new 10 CFR 50.36a reporting requirement, an Annual Radioactive Effluent Release Report will replace the current semiannual report.

The SSES Unit 1 and Unit 2 Technical Specifications also require that the quantity of radioactive solid wastes released be reported in the Semiannual Radioactive Effluent Release Report. Although the reporting requirement associated with solid wastes is not addressed in either the old or new 10 CFR 50.36a, the intent of the revised rulemaking appears to allow for a change to the reporting requirement for solid wastes, similar to that being provided for liquid and gaseous effluents. Therefore, radioactive solid wastes released will also be reported on an annual basis.

The Semiannual Effluent Release Report currently requires the reporting of exceptions to the Effluent Monitoring Program and also changes to the Offsite Dose Calculation Manual (ODCM) and Process Control Program. Exceptions/changes to these programs are necessary to determine offsite doses. Revised 10CFR50.36a requires that the annual report to the NRC include "other information as may be required" to estimate offsite doses. It is therefore consistent with the regulation that exemptions/changes to these programs also be submitted on an annual basis.



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NO SIGNIFICANT HAZARDS CONSIDERATIONS

The proposed change does not:

1. **Involve a significant increase in the probability or consequences of an accident previously evaluated.**

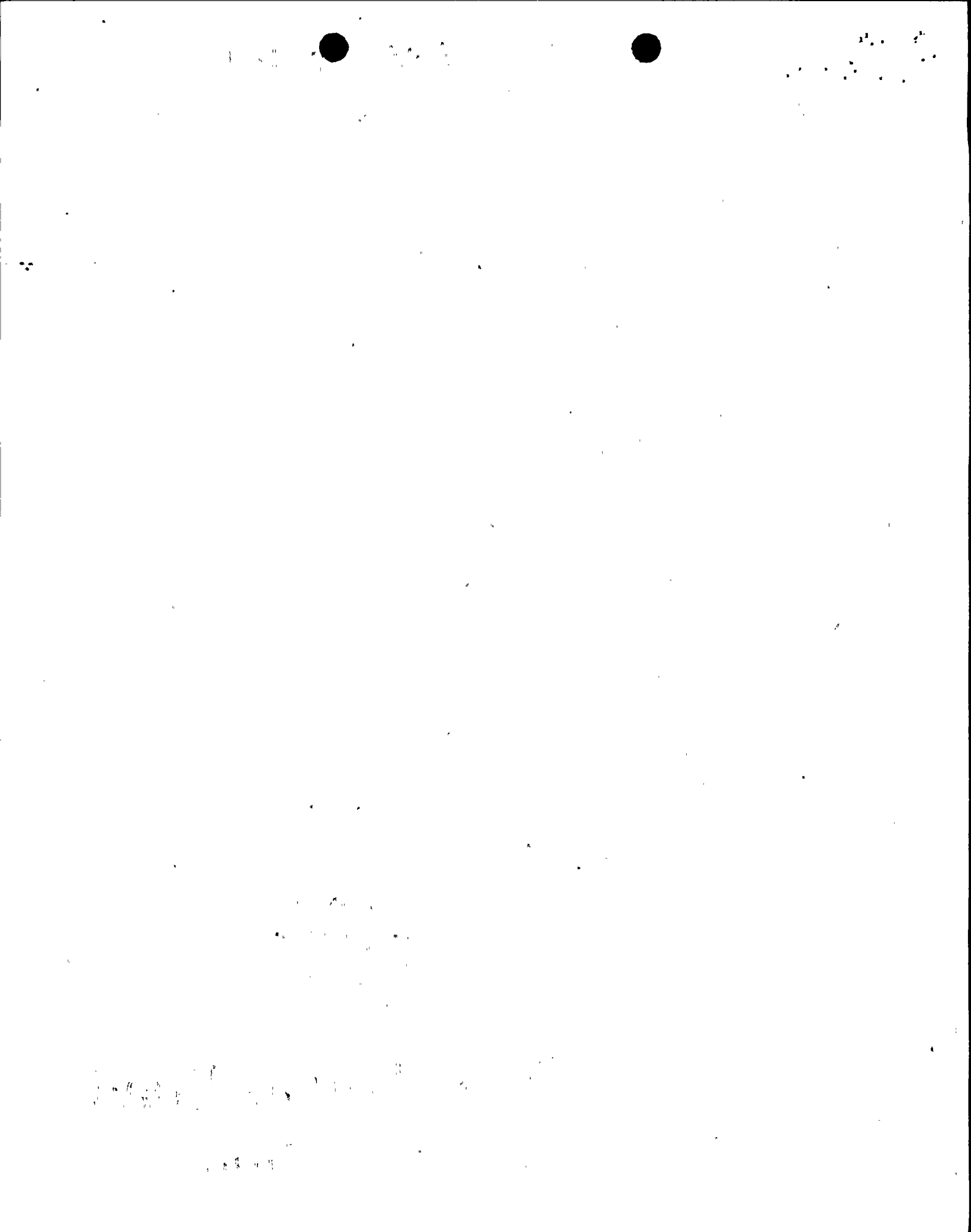
The proposed changes are administrative in nature and do not involve any change to the configuration or method of operation of any plant equipment that is used to mitigate the consequences of an accident nor alter the conditions or assumptions in any of the Final Safety Analysis Report (FSAR) accident analyses. Since the FSAR accident analyses remain bounding, the radiological consequences previously evaluated are not adversely affected by the proposed changes. Therefore, it can be concluded that the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. **Create the possibility of a new or different kind of accident from any accident previously evaluated.**

No new failure modes have been defined for any plant system or component important to safety nor has any new limiting failure been identified as a result of the proposed changes. Also, there will be no change in the types or increase in the amount of effluents released offsite. Therefore, it can be concluded that the proposed changes do not create the possibility of a new or different kind of accident from those previously evaluated.

3. **Involve a significant reduction in a margin of safety.**

The proposed changes are administrative in nature and do not adversely impact the plant's ability to meet applicable regulatory requirements related to liquid and gaseous effluents, and solid waste releases. The proposed change would also eliminate any unnecessary burden of governmental regulation without reducing protection for public health and safety. Therefore, it can be concluded that the proposed changes do not involve a significant reduction in a margin of safety.



IMPLEMENTATION

PP&L requests that these amendments be approved prior to August 1, 1993, to avoid the generation and submittal of the semiannual Radioactive Effluent Release Report currently required to be submitted by August 29, 1993.

Questions regarding the above proposal should be directed to Mr. R.D. Kichline at (215) 774-7916.

Very truly yours,



R. G. Bynam

Attachment

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



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