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SUBJECT: Provides clarification on types of mod to Class
 1E/non-Class 1E computer & annunciator circuits which do not
 require addition isolators.

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Pennsylvania Power & Light Company

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JUN 10 1993

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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
CLARIFICATION OF THE TYPES OF
MODIFICATIONS TO COMPUTER/ANNUNCIATOR
CIRCUITS WHICH DO NOT REQUIRE THE
ADDITION OF ISOLATORS
PLA-3973**

FILE R41-2

**Docket Nos. 50-387
and 50-388**

Dear Mr. Miller:

During the resolution of the isolation of the Class 1E/non-Class 1E computer and annunciator circuits, Pennsylvania Power & Light Company provided commitments on how these circuits were going to be handled in the future. As we begin to implement these commitments, several questions have arisen on what types of modifications to these circuits need to have additional isolators installed. This letter is to provide clarification on the types of modification to Class 1E/non-Class 1E computer or annunciator circuit which do not require the addition of isolators.

In previous correspondence regarding these circuits, PP&L made the following commitments:

- If new computer or annunciator circuits containing Class 1E/non-Class 1E interfaces are added to the plant, qualified isolators will be installed to isolate the Class 1E portion from the non-Class 1E portion.
- If the existing Class 1E/non-Class 1E interface device is modified, qualified isolators will be installed in the circuit.

The intent of the above commitments was that if any part of our existing circuit analyses (either input assumptions or output) were to change due to modifications, then isolators would be installed in the circuits. If the input assumptions or the output does not change, then isolators are not required to be installed in the circuit. The existing analyses were done assuming a certain function for the end device and Class 1E/non-Class 1E interface device, therefore changing the function would change the existing analysis and would require the installation of isolators.

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The following are the types of modifications which do not require the installation of isolators.

- Replacement of the interface device with an identical device.
- Rewiring the interface device such that its function has not changed. Examples of this would be 1) no additional contacts are used and 2) the same initiating input to the interface device for both power and logic is used.
- Relocation of the interface device with no other changes to input or output logic.
- Modify the cabling to the interface device. Examples are 1) replacement of cable with larger/smaller size, 2) additions of splices, 3) extension of the cable thru a terminal block, and 4) addition of cable connections.
- Replacement of end equipment without changing its normal or emergency mode of operation. Examples would be the replacement of a valve or an operator with a different type or size and the normal and accident modes of operations are not changed. That is the valve does not change from being normally open to normally closed or vice versa and the emergency functions of having to open or close does not change.

The above clarifications are being incorporated into our modification process and design description. If you have any questions or comments, please contact Mr. C.T. Coddington at (215) 774-7915.

Very truly yours,


R. G. Byram

cc: ~~NRC Document Control Desk (original)~~
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