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 FACIL: 50-387 Susquehanna Steam Electric Station, Unit 1, Pennsylv 05000387
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 AUTH. NAME AUTHOR AFFILIATION
 BYRAM, R.G. Pennsylvania Power & Light Co.
 RECIPIENT NAME RECIPIENT AFFILIATION
 MILLER, C.L. Project Directorate I-2

SUBJECT: Forwards Proposed Amends 164 & 119 to Licenses NPF-14 & NPF-22, respectively, deleting frequency requirements for number of audits under TS 6.5.2.8 & relocating emergency plan & security plan audit requirements to respective plans.

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Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

Robert G. Byram
Senior Vice President—Nuclear
610/774-7502
Fax: 610/774-5019

APR 05 1994

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 NO. 164 TO LICENSE NPF-14 AND
PROPOSED AMENDMENT NO. 119 TO LICENSE NPF-22:
SRC AUDIT FREQUENCY REQUIREMENTS
PLA-4113**

FILES R41-2/A17-2

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

Dear Mr. Miller:

The purpose of this letter is to propose changes to the Susquehanna SES Units 1 and 2 Technical Specifications. Currently, Technical Specification 6.5.2.8 requires audits to be performed on various unit activities at prescribed frequencies. The proposed Technical Specification change will delete the frequency requirements for a number of audits listed under Technical Specification 6.5.2.8. The audits will continue to be performed in accordance with FSAR Section 13.4.3 and ANSI N18.7-1976 - audit frequencies will be performance based but not in excess of 24 months. The proposed change also includes removing the audit requirements for the Emergency Plan and the Security Plan from Technical Specifications and relocating these requirements to the respective plan documents. No change in frequency is proposed for these latter audits.

The attached analysis discusses the safety basis for the proposed Technical Specification changes and concludes that the changes involve no significant hazards. These changes have been reviewed by the Plant Operations Review Committee (PORC) and the Susquehanna Review Committee (SRC) and have been approved by both committees.

Pennsylvania Power & Light is committed to making these changes to enhance resource utilization in performing the audits required by Technical Specification 6.5.2.8. In addition, the move to a performance based system of auditing will improve feedback to management on the overall effectiveness of the audit program. The proposed changes also allow for a more flexible scheduling process that will better coordinate audits with major plant evolutions (ie. refueling outages, power uprate implementation, etc.). The nature of a performance based audit system might involve increased auditing if warranted; however, current audit program experience

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indicates that less frequent auditing is justified in several areas. As a result, Pennsylvania Power & Light expects to reduce costs associated with audit performance by \$220,000 in the first two years of implementation.

Any questions regarding this request should be directed to Mr. Terence Bannon at (610) 774-7918.

Very truly yours,



R. G. Byram

Attachment

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, Pa DER