

**BEFORE THE
UNITED STATES NUCLEAR REGULATORY COMMISSION**

In the Matter of _____ :
PENNSYLVANIA POWER & LIGHT COMPANY : Docket No. 50-387

**PROPOSED AMENDMENT No. 164
FACILITY OPERATING LICENSE NO. NPF-14
SUSQUEHANNA STEAM ELECTRIC STATION
UNIT NO. 1**

Licensee, Pennsylvania Power & Light Company, hereby files proposed Amendment No. 164 to its Facility Operating License No. NPF-14 dated July 17, 1982.

This amendment contains a revision to the Susquehanna SES Unit 1 Technical Specifications.

PENNSYLVANIA POWER & LIGHT COMPANY
BY:



R. G. Byram
Sr. Vice President - Nuclear

Sworn to and subscribed before me
this 5 of April, 1994.



Notary Public

Notarial Seal
Martha C. Sedora, Notary Public
Allentown, Lehigh County
My Commission Expires Jan. 15, 1998
Member, Pennsylvania Association of Notaries

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**BEFORE THE
UNITED STATES NUCLEAR REGULATORY COMMISSION**

In the Matter of

:

Docket No. 50-388

PENNSYLVANIA POWER &
LIGHT COMPANY

:

**PROPOSED AMENDMENT No. 119
FACILITY OPERATING LICENSE NO. NPF-22
SUSQUEHANNA STEAM ELECTRIC STATION
UNIT NO. 2**

Licensee, Pennsylvania Power & Light Company, hereby files proposed Amendment No. 119 to its Facility Operating License No. NPF-22 dated March 23, 1984.

This amendment contains a revision to the Susquehanna SES Unit 2 Technical Specifications.

PENNSYLVANIA POWER & LIGHT COMPANY
BY:



R. G. Byram
Sr. Vice President - Nuclear

Sworn to and subscribed before me
this 5th of April, 1994.



Notary Public
Martha C. Sedora, Notary Public
Allentown, Lehigh County
My Commission Expires Jan. 15, 1998

Member, Pennsylvania Association of Notaries

**SAFETY ASSESSMENT
SRC AUDIT FREQUENCY REQUIREMENTS
TECHNICAL SPECIFICATION 6.5.2.8**

BACKGROUND

The purpose of the audit process is to verify the adequacy and effectiveness of the Quality Assurance Program during operations, maintenance, modifications, testing and support through compliance with license commitments, Quality Assurance Program requirements and Technical Specifications. Furthermore, the audit program is mandated by 10 CFR 50 Appendix B and ANSI N18.7-1976.

Quality Assurance personnel perform certain audits, as listed in Technical Specification 6.5.2.8, under the cognizance of the Susquehanna Review Committee (SRC). Currently, the frequencies for performing these audits are prescribed in Technical Specification 6.5.2.8, and vary depending on the area being audited. PP&L has been performing these audits, at their prescribed frequencies, for a number of years. The results from these audits indicate that the Quality Assurance Program is effective in fostering quality in the functions being audited.

PP&L believes that the effectiveness of the audit program, for the audits listed in Technical Specification 6.5.2.8, can be maintained or enhanced by applying performance based principles to the audit program. The proposed change will allow several of the audits controlled under Technical Specification 6.5.2.8 to be scheduled based on the health of the function being audited. Under this change, all audits will be performed at least every 24 months. The audits of the Emergency Plan and Security Plan will continue to be performed annually in accordance with 10 CFR 50.54.

A similar Technical Specification change was approved for the Virginia Electric and Power Company - Surry and North Anna Stations. In addition, the proposed change is in keeping with the guidance provided in Improved Technical Specifications, NUREG 1433.

DESCRIPTION OF CHANGE

Pennsylvania Power & Light (PP&L) proposes altering Technical Specifications 6.5.2.8a-d and 6.5.2.8h-n to delete the references to specific audit frequencies. Under this change, the maximum time between specific audits would be no more than 24 months, in accordance with FSAR Section 13.4.3 and ANSI N18.7-1976. Corrective measures to audit findings as well as audit scheduling will be maintained by the Quality Assurance Program to assure proper coverage of all applicable activities. Technical Specification requirement 6.5.2.8g is not impacted by this proposed change, as it does not include a performance frequency.

PP&L also proposes to remove Technical Specifications 6.5.2.8e,f from Technical Specifications. Under this administrative change, the Emergency Plan (6.5.2.8e) and Security Plan (6.5.2.8f) audits would be removed from Technical Specifications and included within their respective plans. This proposed change is based on guidance provided in NRC Generic Letter 93-07, "Modification of the Technical Specification Administrative Control Requirements for Emergency and Security Plans".

A mark-up of Technical Specification 6.5.2.8, showing the proposed changes, is attached to this analysis.

SAFETY ANALYSIS

The proposed change does not decrease the number of activities that are presently audited. However, the frequencies of audits 6.5.2.8a-d and 6.5.2.8h-n will be adjusted, based on performance, to a maximum of 24 months, in accordance with FSAR Section 13.4.3 and ANSI N18.7-1976. Over the past two years, a steady decrease in the number of audit findings has been observed in all areas audited. Recently, the number of audit findings has stabilized at a low number, indicating an effective and mature Quality Assurance Program. Based on the effective past performance of the audit program, the proposed change to a performance based system for determining audit frequencies is justified.

Technical Specification 6.5.2.8a states that an audit of conformance of unit operation to provisions contained within Appendix A Technical Specification be performed at least once per 12 months. Reducing the frequency of the annual audit to biennial (24 months) will not adversely impact compliance with those provisions of the Technical Specifications on the effectiveness of audits performed. Compliance with the Technical Specification and license conditions is evaluated more often than each 12 months, although not in a single Technical Specification audit. This is done through typical plant surveillance procedures and through the performance of other unit activity audits that evaluate applicable aspects of Technical Specifications.

Technical Specification 6.5.2.8b states that an audit of unit staff's qualifications be performed annually. The proposed change allows the time between audits to be adjusted based on performance as well as importance to safety to a maximum of 24 months. The change from a prescribed annual audit to a performance based audit frequency, not in excess of 24 months, is not projected to adversely impact staff qualification or the effectiveness of the audit program, because management can modify the audit frequency based on observed performance.

Technical Specification 6.5.2.8c states that an audit of results of actions taken to correct deficiencies occurring in unit equipment, structures, systems or method of operation that affect nuclear safety be performed at least once per 6 months to evaluate the programmatic controls which govern the corrective action process. The proposed Technical Specification change will allow the frequency of the audits to be adjusted, based on performance, to a maximum of 24 months. The change from a prescribed biannual audit to a performance based audit frequency, not in excess of 24 months, is not projected to adversely impact the effectiveness of the corrective action program or the audit program, because management can modify the audit frequency based on observed performance.

Technical Specification 6.5.2.8d calls for an audit of performance of activities required by the Operational Quality Assurance Program to be performed at least once per 24 months. The proposed change will not affect its frequency.

Technical Specification 6.5.2.8e calls for an audit of the Emergency Plan and its implementing procedures at least once per 12 months. In accordance with Generic Letter 93-07, the reference to perform the Emergency Plan audit will be removed from Technical Specifications and added to the Emergency Plan. The requirement for the audit is included in 10 CFR 50.54(t). No change in the audit frequency is proposed.

Technical Specification 6.5.2.8f calls for an audit of the Security Plan and its implementing procedures at least once per 12 months. Section 15.1 of the SSES Physical Security Plan references this annual audit requirement. In accordance with Generic Letter 93-07, 6.5.2.8f will be removed from Technical Specifications and maintained in the Security Plan. The requirement for the audit is included in 10 CFR 50.54(p). No change in the audit frequency is proposed.

Technical Specification 6.5.2.8g calls for the audit of any other unit operation considered appropriate by the SRC or the Senior Vice President - Nuclear. The proposed change does not impact this Technical Specification.

Technical Specification 6.5.2.8h calls for an audit of the Fire Protection Program and implementing procedures to be performed at least once per 24 months. The proposed change will not affect its frequency.

Technical Specification 6.5.2.8i calls for an independent fire protection and loss prevention inspection and audit be performed at least once per 12 months utilizing either qualified offsite licensee personnel or an outside fire protection firm. Technical Specification 6.5.2.8j calls for an inspection and audit of the fire protection and loss prevention program be performed by an outside qualified fire consultant at intervals no greater than 36 months. The proposed change will combine annual and triennial audits into one biennial audit which will be alternated with the Fire Protection Program audit (described in 6.5.2.8h above). No adverse impact on effectiveness of 6.5.2.8i,j is projected because the proposed alternate audit program continues to evaluate the areas addressed in NRC Generic Letter 82-21, utilizes the same recommended resources and is comprehensive in its review of fire protection and loss prevention features.

Technical Specification 6.5.2.8k calls for an audit of the program and implementation of the radiological environmental monitoring program at least once per 12 months. The proposed change allows the time between audits to be adjusted based upon the radiological environmental monitoring program's performance to a maximum of 24 months. The change from a prescribed annual audit to a performance based audit frequency, not in excess of 24 months, is not projected to adversely impact the effectiveness of the radiological environmental monitoring program or the audit program, because management can modify the audit frequency based on observed performance.

Technical Specifications 6.5.2.8l,m call for audits of the Offsite Dose Calculation Manual and Process Control Program be performed at least once per 24 months. The proposed change will not affect its frequency.

Technical Specification 6.5.2.8n calls for an audit of the performance of activities required by the Quality Assurance Program to meet the criteria of Regulatory Guide 4.15, Quality Assurance for Radiological Monitoring Programs - Effluent Streams and the Environment, December 1977 at least once per 12 months. The proposed change allows the audits to be

adjusted based upon the radiological environmental monitoring program's performance to a maximum of 24 months if needed. The change from a prescribed annual audit to a performance based audit frequency, not in excess of 24 months, is not projected to adversely impact the effectiveness of the area audited or the audit program, because management can modify the audit frequency based on observed performance.

NO SIGNIFICANT HAZARDS CONSIDERATIONS

- I. **This proposal does not involve a significant increase in the probability or consequences of an accident previously evaluated.**

The proposed Technical Specification changes to delete prescribed audit frequencies and remove the Emergency Plan and Security Plan from Technical Specifications are administrative in nature and neither directly increase or decrease the likelihood that an accident will occur. The Technical Specification changes will not impact the function or method of operation of plant systems, structures, or components. Thus, the consequences of a malfunction of equipment important to safety previously evaluated in the FSAR is not increased by the changes. Therefore, it is concluded that the proposed changes do not increase the probability or consequences of an accident previously evaluated.

- II. **This proposal does not create the possibility of a new or different kind of accident or from any accident previously evaluated.**

The proposed Technical Specification changes to delete prescribed audit frequencies and remove the Emergency Plan and Security Plan from Technical Specifications are administrative in nature and do not involve changes to the physical plant or operations. The proposed changes do not affect systems, structures, or components (SSCs) or the operation of these SSCs; and therefore do not create the possibility of a new or different kind of accident.

- III. **This change does not involve a significant reduction in a margin of safety.**

The proposed Technical Specification changes to delete prescribed audit frequencies and remove the Emergency Plan and Security Plan from Technical Specifications do not involve any reductions in the margin of safety. The proposed changes will enable more effective resource utilization through performance based scheduling of audits in the affected areas. Using performance indicators and other measures of program effectiveness, potential problems can be more readily identified and audit resources can be applied to these areas to enhance performance. The proposed performance based audit process will maintain or enhance the margin of safety in the areas audited.

ENVIRONMENTAL CONSEQUENCES

The environmental consequences considered in Technical Specification 6.5.2.8 are adequately maintained through proper auditing of those unit activities that pose environmental concerns. Since the proposed change in no way diminishes the number of activities that are audited, or the thoroughness of the audits, no new environmental consequences are imposed.

IMPLEMENTATION

It is requested that these changes be approved as soon as possible.