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 RECIPIENT NAME                  RECIPIENT AFFILIATION  
 MILLER, C.L.                      Project Directorate I-2

SUBJECT: Forwards proposed amends 167 & 122 to licenses NPF-14 & NPF-22, respectively. Proposed amends reflects NRC policy w/ respect to relief requests for ISI programs governed under Spec 4.0.5.

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Director of Nuclear Reactor Regulation  
Attn: Mr. C. L. Miller, Project Director  
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U.S. Nuclear Regulatory Commission  
Washington, DC 20555

**SUSQUEHANNA STEAM ELECTRIC STATION  
PROPOSED AMENDMENT NO. 167 TO LICENSE NPF-14  
AND PROPOSED AMENDMENT NO. 122 TO LICENSE NPF-22:  
REVISIONS TO SURVEILLANCE REQUIREMENT 4.0.5  
PLA-4158 FILE R41-2**

Docket Nos. 50-387  
and 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 the NRC's policy with respect to relief requests for the inservice inspection programs governed under Specification 4.0.5.

**BACKGROUND**

Technical Specification 4.0.5 provides the requirements for inservice inspection and testing of ASME Code components. Item a of this Specification specifies that specific written relief from the Commission is needed for relief requests. This specification could be interpreted to mean that written relief is needed prior to implementation of the relief request.

The Commission's position as stated in the approved Improved Technical Specifications and proposed Supplement 1 to Generic Letter 89-04 is that prior approval to implement relief requests for impracticable testing or surveillance requirements is not required. At several public meetings, the NRC Staff has recommended that the Technical Specification 4.0.5 be revised in order to avoid any misinterpretation.

The purpose of this Technical Specification Change is to avoid any misinterpretation of the Commission's position on the implementation of relief requests.

**DESCRIPTION OF CHANGE:**

In order to avoid any misinterpretations, Specification 4.0.5 for both Units is being revised to conform to the approved Improved Technical Specifications. The proposed changes are as follows:

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- Revise Item a of Specification 4.0.5 as follows:  
  
... and applicable Addenda as required by 10 CFR 50, ~~Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(6)(i).~~
  
- Revise Item b of Specification 4.0.5 as follows:  
  
... Pressure Vessel Code and applicable Addenda ~~shall be applicable~~ *are* as follows in these Technical Specifications:
  
- Add the following to Item b in the frequency table:  
  
Biennially or every 2 years      At least once per 731 days
  
- Revise Item d of Specification 4.0.5 as follows:  
  
~~Performance of the above inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements.~~ The provisions of Specification 4.0.3 are applicable to inservice testing activities.

In addition on Unit 2 delete the \* footnote on page 3/4 0-2 that is no longer applicable.

Refer to the attached marked up Technical Specifications.

#### SAFETY ANALYSIS:

The regulations for the industry's codes and standards are stated in 10 CFR 50.55a. Before March 15, 1976, the regulations contained no requirements for IST of pumps and valves. The ASME Boiler and Pressure Vessel Code (the Code) first included Subsections IWP and IWV to Section XI in the Summer 1973 Addenda. The rules effective March 15, 1976, required that an operating license for a utilization facility be subject to the conditions specified in 10 CFR 50.55a(g), which included new requirements for the IST of pumps and valves. The regulations provided for alternatives to the requirements if compliance would result in hardship without a compensating increase in the level of quality and safety, or if the proposed alternatives would give an acceptable level of quality and safety. The regulations also provided for relief from Code requirements if a licensee determined that conformance was impractical for its facility. The regulations continue to include these provisions.

After publishing the rules that took effect March 15, 1976, the NRC issued letters to licensees informing them of the rule change and recommending that they propose technical specification changes that contain a standard statement. This standard statement was included in the Standard Technical Specifications for BWRs that was the basis for our Technical Specifications.

In letters of November 1976, the NRC further discussed the regulation, which required updates of the inservice inspection programs at 40-month intervals and the IST programs at 20-month intervals. The NRC suggested that licensees submit requests for relief from ASME Code requirements as far in advance as possible of the start of any 20-month period for testing pumps and valves. The NRC stressed the need to incorporate 10 CFR 50.55a(g) by reference in technical specifications (1) to avoid duplication of requirements, (2) to alleviate the need for technical specification changes whenever a testing program is updated, and (3) to simplify the process for obtaining relief from impractical ASME Code requirements.

The NRC discussed relief requests as follows in the letters to licensees:

Generally, the licensee will know well in advance of the beginning of any inspection period, whether or not a particular ASME Code requirement will be impractical for his facility. Thus, the licensee should request relief from ASME Code requirements as far as possible in advance of the start of the inspection period. Early submittals are particularly important for the first 40-month inservice and 20-month pump and valve testing period [NOTE: This testing period was later changed to 120-month intervals for both ISI and IST] because they will enable the NRC staff to evaluate the information received from all licensees and determine which ASME Code requirements may be generally impractical for various classes of plants. Early submittals will thereby facilitate earlier feedback to licensees regarding the acceptability of their requests.

The NRC Staff recognizes that it will not be possible in all cases for a licensee to determine in advance that any particular ASME Code requirement will be impractical for his facility. In cases where, during the process of inservice testing, certain requirements are found to be impractical due to unforeseen circumstances, the licensee may request relief at that time. These occurrences are not expected to be many and are expected to result in only minor changes to an inservice testing program.

All relief from ASME Code requirements that are determined to be impractical for a facility will be granted in the form of a letter within the provisions of Section 50.55a(g)(6)(i). This written relief should be incorporated into the document describing the inservice inspection and testing program retained by the licensee...the written relief itself will not become an explicit part of the facility license...

In the 1976 letter to licensees, the NRC staff recognized that situations would arise which would put the licensee in a condition that is not in strict compliance with the Technical Specification 4.0.5 requirement to comply with ASME Section XI "except where specific written relief has been granted." Therefore, if Technical Specification 4.0.5 was interpreted literally, it would require the licensee to address these situations by shutting down the plant to perform testing. For example, the Technical Specification would require a shutdown because a pump or valve that would otherwise require IST and that was the subject of a relief request must be considered inoperable until the NRC issues a safety evaluation granting relief from the requirements of ASME Section XI. This conflict could result in the licensee exceeding a limiting condition for operation when the component can meet its functional requirements, and is the basis for the change in the revised standard technical specifications.

The revised standard technical specifications reflect the position that the licensee must establish and implement the program in accordance with 10 CFR 50.55a, which does not require that relief requests must be granted before they are implemented. Rather, the Code allows a licensee up to a full year after the beginning of the updated interval to inform the NRC of those new Code requirements that cannot be met and to request relief. The regulations require the licensee to submit requests within 12 months of the interval start date, or during the interval as it finds specific needs for relief.

Making these proposed changes does not impact the safe operation of Susquehanna SES in that the requests for relief are based on impractical testing requirements due to the design of Susquehanna SES; and the proposed alternate testing is based on NRC guidance and previously accepted relief requests. These relief requests do not compromise safety. In unique situations, PP&L seeks approval from the NRC prior to implementing the relief from the Code requirements.

In the past the NRC and PP&L have interpreted that relief request could be implemented as long as the relief requests were submitted to the NRC prior to use. These proposed changes support that position and conform to the existing requirements of the ASME Code.

The deletion of the \* footnote on page 3/4 0-2 is an administrative function since this footnote is no longer applicable.

**NO SIGNIFICANT HAZARDS CONSIDERATIONS:**

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

The proposed changes are administrative in nature in that the changes eliminate any possibility of misinterpretation of the ASME Code requirements that allow for a utility to submit relief requests to the Commission within one year and allows for the implementation of these request prior to Commission review and approval. The relief requests are based on and provide for alternative testing based on industry practice that provides an equivalent level of quality and safety as the Code requirement. The Commission will still provide acceptance of the relief requests in writing. 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. 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 inservice testing or inspection. The proposed changes eliminate any possible misinterpretation of the Code requirements regarding relief requests and do not reduce the protection of public health and safety. Therefore, it can be concluded that the proposed changes do not involve a significant reduction in a margin of safety.

If you have any questions concerning these proposed changes, please contact Mr. C.T. Coddington at (610) 774-7915.

Very truly yours,



R. G. Byram

Attachment

cc: NRC Document Control Desk (original)  
NRC Region I  
Mr. G. S. Barber, NRC Sr. Resident Inspector  
Mr. C. Poslusny, NRC Project Manager  
Mr. W. P. Dornsife, PA DER