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ACCESSION NBR: 9407060169 DOC. DATE: 94/06/30 NOTARIZED: NO DOCKET #
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 50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylva 05000388
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 RECIP. NAME RECIPIENT AFFILIATION
 MILLER, C.L. Project Directorate I-2

SUBJECT: Forwards NSHC analysis being provided to correct clerical error made in submittal of Amends 166 & 121 Tech Specs for plant. Error omission of several words in fifth sentence of response to question II.

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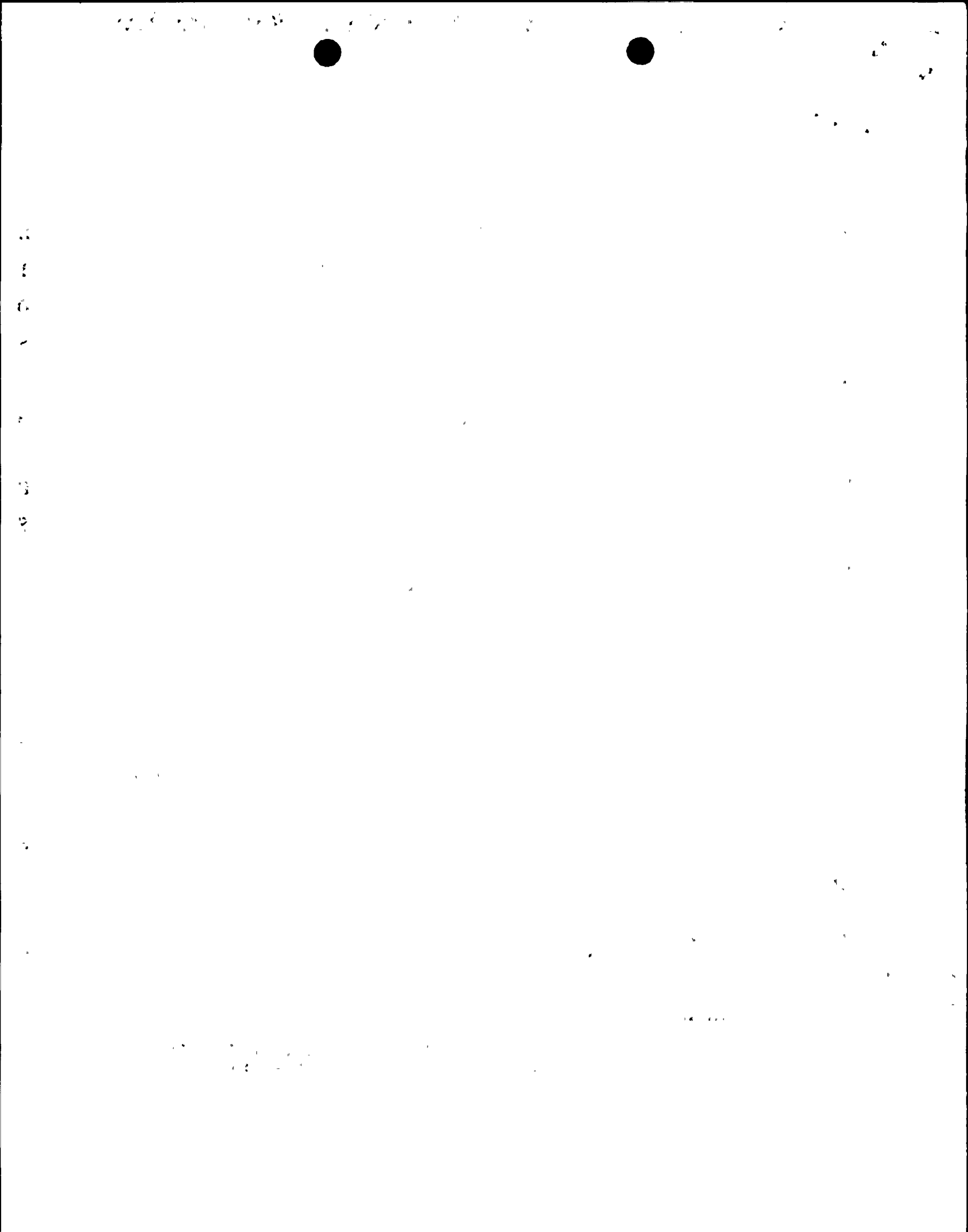
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JUN 30 1994

Director of Nuclear Reactor Regulation
Attn: Mr. C. L. Miller, Project Director
Project Directorate I-2
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
Washington, DC 20555

SUSQUEHANNA STEAM ELECTRIC STATION
NO SIGNIFICANT HAZARDS CONSIDERATIONS
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PLA-4165 FILES R41-2/A17-2

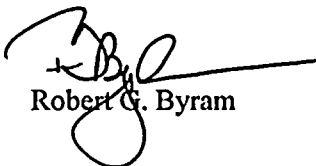
Docket Nos. 50-387
and 50-388

Dear Mr. Miller:

The attached No Significant Hazards Considerations analysis is being provided to correct a clerical error made in the submittal of Amendments 166 and 121 to Technical Specifications for the Susquehanna Steam Electric Station. The error was the omission of several words in the fifth sentence of the response to question II. A complete No Significant Hazards Considerations analysis is being provided to replace the affected document.

I apologize for any inconvenience this may have caused. If you have any questions or require additional information, please contact Mr. Terence G. Bannon at (610) 774-7918.

Very truly yours,



Robert G. Byram

Attachment

cc: NCR 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

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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 change to delete the operability requirement for the SLC System in OPCON 5* (OPERATIONAL CONDITION 5 with any control rod withdrawn) does not affect the probability or consequences of an accident previously evaluated. Design basis accident mitigation scenarios for SSES in OPCON 5 do not depend on, or require, SLC operability; therefore, the proposed change to delete SLC operability in OPCON 5* does not affect the probability or consequences of an accident previously evaluated.

The proposed Technical Specification change to delete Surveillance Requirement 4.1.5.d.3, 18 month SLC heater operability check, does not affect the probability or consequences of an accident previously evaluated. Regarding the SLC heater function, the operability of the SLC systems depends on maintaining the temperature of the sodium pentaborate solution above 70°F to prevent the boric acid from precipitating out of solution. SLC heater 'A' is used to maintain tank temperature between 85°F and 95°F, thus ensuring that the boric acid remains in solution. The operability of heater 'A' is verified through the daily performance of Technical Specification Surveillance Requirement 4.1.5.a.1, which checks SLC solution temperature, and a control room alarm. Heater 'B' functions to raise SLC solution temperature prior to the mixing of SLC chemicals - the mixing of sodium pentaborate and water is an endothermic (heat consuming) reaction. The operability of heater 'B' is verified at the time when chemicals are added to the SLC tank, since a precondition for adding the chemicals is using heater 'B' to increase tank temperature to 100°F. Heater 'B' does not function to maintain tank temperature during normal operation. Therefore, the proposed change does not impact Susquehanna's ability to maintain SLC solution temperature and thus does 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 change to delete the operability requirement for the SLC System in OPCON 5* does not create the possibility of a new or different kind of accident or from any accident previously evaluated. The purpose of the SLC System is to provide backup capability for bringing the reactor from full power to a cold, Xenon-free shutdown, assuming that none of the withdrawn control rods can be inserted. This bases is consistent with the required operability of the SLC System in OPCONs 1 & 2. The proposed change does not affect the ability of SLC to meets its design basis. No credit is taken for SLC in OPCON 5 to mitigate the effects of reactivity transients, and the SLC system is not designed to terminate an inadvertent criticality event during core alterations (OPCON 5) with vessel water level at least 22 feet above top of vessel flange. Therefore, no new or different accident scenarios are created by the proposed change.

The proposed Technical Specification change to delete Surveillance Requirement 4.1.5.d.3, 18 month SLC heater operability check, does not create the possibility of a new or different kind of accident or from any accident previously evaluated. The proposed change does not affect systems, structures, or components (SSCs) or the operation of these SCCs. The heating and heater control subsystems of the SLC system will continue to function as they were designed. The proposed change does not alter the heating limits or the method for maintaining SLC solution temperature. Therefore, the proposed change does not create the possibility of a new or different kind of accident or from any accident previously evaluated.

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

The proposed Technical Specification change to delete the operability requirement for the SLC System in OPCON 5* does not involve a significant reduction in a margin of safety. The potential for a decrease in the margin of safety, under this proposed change, would be associated with periods during OPCON 5* when the SLC system was not operable. Allowing the SLC system to be inoperable during OPCON 5* with the vessel level at least 22 feet above top of vessel flange, represents no reduction in the margin of safety since the SLC system is not designed to terminate an inadvertent criticality event with a greater volume of water in the reactor. Having the SLC system inoperable in OPCON 5* with reactor water levels at normal operating volumes, does not significantly reduce the margin of safety because of the number of other design and operating features which act to prevent inadvertent criticality events. Adequate shutdown margin is maintained through design and administrative controls; including, Shutdown Margin Demonstration, Technical Specification 3.1.1, defueling and refueling procedures, and refueling interlocks. In addition, the Reactor Protection System monitors for recriticality and actuates the Control Rod Scram function prior to a return to criticality.

The proposed Technical Specification change to delete Surveillance Requirement 4.1.5.d.3, 18 month SLC heater operability check, does not involve a significant reduction in a margin of safety. Adequate controls are in place, independent of the 18 month heater operability check, to ensure that the temperature of the sodium pentaborate solution is maintained above 70°F. These controls include Surveillance Requirement 4.1.5.a.1, which checks SLC solution temperature daily, a control room alarm on low and high temperature, and the ambient temperature conditions in the SLC area which prevent rapid changes in SLC solution temperature. Operability of the 'B' heater is not needed to maintain SLC solution temperature, and the operability of this heater is verified at the time when chemicals are added to the SLC tank.

