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 MILLER, C.L.      Project Directorate I-2

SUBJECT: Documents PP&L support of NRC initiative to revise 10CFR50, App J within framework of NRC "marginal to safety" program & recent telcon between PP&L & NRC re interpretation of TS 4.6.1.2.a for SSES.

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Washington, DC 20555

**SUSQUEHANNA STEAM ELECTRIC STATION**  
**TECHNICAL SPECIFICATION INTERPRETATION**  
**PLA-4197** **FILE R41-2**

Docket Nos. 50-387  
and 50-388

Dear Mr. Miller:

The purpose of this letter is to document Pennsylvania Power & Light Company's support of the NRC's initiative to revise 10CFR50 Appendix J within the framework of your "marginal to safety" program. The revised 10CFR50 Appendix J is of great benefit to us in that the testing will be performance and risk based and less prescriptive than the existing requirements. We encourage the NRC to complete the rulemaking process as quickly as possible.

In addition this letter documents a recent telephone conversation between PP&L and NRC staff regarding an interpretation of Technical Specification 4.6.1.2.a for Susquehanna SES. Specification 4.6.1.2.a states the following:

"Three Type A Overall Integrated Containment Leakage Rate tests shall be conducted at  $40 \pm 10$  month intervals during shutdown at  $P_a$ , 45.0 psig, during each 10-year service period."

Pennsylvania Power and Light Company's interpretation is that three Type A tests are required per 10-year service period and that the schedule for these three Type A tests begins at the start of each 10-year service interval. Therefore, the first Type A test would be performed at an interval of  $40 \pm 10$  months from the start of the 10-year service interval and not at an interval of  $40 \pm 10$  months from the performance of the last Type A test.

Specifically for Susquehanna SES the following summarizes the Type A tests performed or scheduled to be performed on each unit for the first two 10-year service periods:

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TYPE A TESTS		
	Unit 1	Unit 2
First 10-year service period	June 8, 1983 to May 31, 1994	February 12, 1985 to May 31, 1994
Type A Test Dates-(actual)	May 23, 1982	November 2, 1983
	June 1, 1985	June 10, 1986
	May 30, 1989	November 3, 1989
	May 5, 1992	October 31, 1992
Second 10-year service period	June 1, 1994 to May 31, 2004	June 1, 1994 to May 31, 2004
Type A Test Dates (currently projected)	March, 1998	March, 1997
	March, 2001	March, 2000
	March, 2004	March, 2003

The above interpretation was discussed with your staff and they had no comments on the interpretation.

In addition to Technical Specification 4.6.1.2.a, Technical Specification 4.6.2.1.d is interpreted in the same manner as Specification 4.6.1.2.a. Specification 4.6.2.1.d states the following:

"By conducting a drywell-to-suppression chamber bypass leak test at an initial differential pressure of at least 4.3 psi and verifying that the  $A/\sqrt{k}$  calculated from the measured leakage is within the specified limit. The bypass leak test shall be conducted at  $40 \pm 10$  month intervals during shutdown, during each 10 year service period. If any drywell-to-suppression chamber bypass leak test fails to meet the specified limit, the test schedule for subsequent tests shall be reviewed and approved by the Commission. If two consecutive tests fail to meet the specified limit, a test shall be performed at least every 18 months until two consecutive tests meet the specified limit, at which time the above test schedule may be resumed."

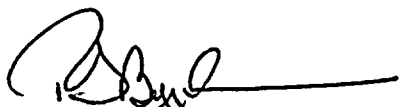
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Since this specification also requires the drywell-to suppression chamber bypass test to be conducted at intervals of  $40 \pm 10$  months during the 10-year service period, the beginning of the 10-year service period would be the starting point for scheduling the bypass test at a  $40 \pm 10$  month interval. This bypass test is scheduled and performed in conjunction with the Type A test.

The interpretation of Specification 4.6.2.1.d was not discussed with your staff. However, since it is similar to Specification 4.6.1.2.a and is now done in conjunction with the Type A test, the same interpretation applies.

If you have any questions or comments, please contact Mr. C. T. Coddington at (610) 774-7915.

Very truly yours,



R. G. Byram

cc: NRC Document Control Desk (original)  
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