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SUBJECT: Forwards TS change request 95-002B,revising TS 3/4.3.7.5, "Accident Monitoring Instrumentation," bases to reflect conformance to Reg Guide 1.97 via alternate criteria of NEDO-31558A using APRM subfunction of existing NMS.

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SUSQUEHANNA STEAM ELECTRIC STATION
POST-ACCIDENT NEUTRON MONITORING
PLA-4301 FILES R41-2/A17-6

Docket Nos. 50-387
and 50-388

Reference: ***NRC Letter from C. Poslusny to R. G. Byram, November 28, 1994.***

Pennsylvania Power & Light has reviewed the referenced letter concerning relaxation of criteria for post-accident neutron flux monitoring. Based on this review, and analysis performed by the BWROG and PP&L, PP&L will use the Neutron Monitoring System in place of the Ex-core System for neutron flux monitoring.

PP&L conformance to Regulatory Guide (R.G.) 1.97, Rev. 2 was documented in PLA-2222. As part of our conformance, Ex-core neutron flux monitors were identified as the equipment that would be used for post-accident neutron flux monitoring. Subsequent industry analysis in BWROG NEDO-31558 determined that the existing Neutron Monitoring System was adequate to perform the post-accident neutron flux monitoring function. The industry analysis was approved by the NRC in an SER dated January 13, 1993. PP&L has reviewed this analysis and has determined that it can be applied to Susquehanna SES. Therefore, PP&L has adopted the alternate criteria established in BWROG NEDO-31558 for neutron flux monitoring instrumentation in lieu of the Category 1 criteria stated in R.G. 1.97.

PP&L identified several changes which needed to be made to transition from the Ex-core monitors to the Neutron Monitoring System for post-accident monitoring. Actions have been taken to update the FSAR and Technical Specification Basis; internal procedures and programs are also being updated. PP&L will maintain the current Technical Specification requirement for post-accident neutron flux monitoring identified in TS 3.3.7.5. This requirement will be met via the Neutron Monitoring System. While these actions are adequate to transition from the Ex-core

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monitors to the Neutron Monitoring System on Susquehanna Unit 1, additional actions are needed on Unit 2.

On March 1, 1995, the NRC granted an exigent Amendment to the Unit 2 Technical Specifications which revised the Required Number of Channels and the Minimum Channels Operable for the Accident Monitoring Neutron Flux function to be 1 and 0 respectively. This action was taken in response to the inoperability of the "B" Ex-core monitoring channel. At the time, the Ex-core monitors were used to provide the Technical Specification required post-accident monitoring function. As the Neutron Monitoring System is now used to perform the Technical Specification required function, full post-accident neutron monitoring capability has been restored and the operability of the "B" Ex-core channel is no longer required. An Amendment request will be submitted to the NRC to reestablish the content of Technical Specification 3.3.7.5 which existed prior to the exigent Amendment. In the interim, administrative controls will be placed on Unit 2 Technical Specification 3.3.7.5 to ensure that the original conservative channel operability requirements are maintained.

A copy of the revised Technical Specification Basis to the Unit 2 Technical Specifications is enclosed. If you have any questions on this matter, or require additional information, please contact Mr. Terence Bannon at (610) 774-7918.

Very truly yours,

for Robert G. Byram

Enclosure

copy: NRC Region I
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Mr. C. Poslusny, NRC Sr. Project Manager-OWFN