

BEFORE THE
UNITED STATES NUCLEAR REGULATORY COMMISSION


In the Matter of :
PENNSYLVANIA POWER & LIGHT COMPANY : Docket No. 50-388

PROPOSED AMENDMENT No. 145
FACILITY OPERATING LICENSE NO. NPF-22
SUSQUEHANNA STEAM ELECTRIC STATION
UNIT NO. 2

Licensee, Pennsylvania Power & Light Company, hereby files proposed Amendment No. 145 to its Facility Operating License No. NPF-22 dated March 23, 1984.

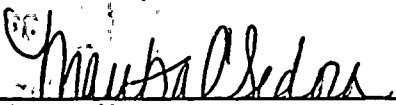
This amendment contains a revision to the Susquehanna SES Unit 2 Technical Specifications.

PENNSYLVANIA POWER & LIGHT COMPANY
BY:



R. G. Byram
Sr. Vice President - Nuclear

Sworn to and subscribed before me
this 1st of August, 1995.



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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***SAFETY ASSESSMENT
ACCIDENT MONITORING INSTRUMENTATION***

BACKGROUND

On March 1, 1995, the NRC approved a request for an exigent amendment to Unit 2 Technical Specification Table 3.3.7.5-1 (Amendment 115). The exigent amendment allowed for the continued operation of Unit 2 with one (1) Required Channel of Neutron Flux Accident Monitoring, and no (0) Minimum Channels Operable. This was a change from the two (2) Required Channels and one (1) Minimum Channel that had previously been required. The NRC approval was contingent on reestablishing the original functional operability no later than the Unit 2 seventh refueling outage. At the time of the request, Susquehanna used the Ex-Core Neutron Monitoring system to provide the Technical Specification required function, and to comply with Regulatory Guide 1.97. Subsequently, PP&L evaluated the use of the existing Neutron Monitoring System - APRM subfunction to provide the Neutron Flux Accident Monitoring Instrumentation. PP&L concluded that the APRM subfunction could be used to perform Neutron Flux Accident Monitoring. As a result, PP&L modified Technical Specification Bases 3/4.3.7.5, Accident Monitoring Instrumentation, for both Susquehanna units to allow the APRM subfunction to perform post accident neutron flux monitoring. PP&L also determined that the original operability requirements shown in Item #13 of Technical Specification Table 3.3.7.5-1 could be safely applied to the APRM subfunction, given the design of the Neutron Monitoring System at Susquehanna. Administrative controls were placed on Unit 2 Technical Specification Table 3.3.7.5-1 to ensure that the original conservative channel operability requirements were maintained.

PP&L is now proposing a change to the Unit 2 Technical Specifications to reestablish the original operability requirements for the Neutron Flux function, and to delete the footnote that was added to Technical Specification page 3/4 3-71 under Amendment 115, regarding the length of time that the revised operability values were valid.

DESCRIPTION OF CHANGE

The proposed change is to revise Susquehanna Unit 2 Technical Specification Table 3.3.7.5-1 as follows:

- a. Revise Item #13, Required Number of Channels from 1 to 2.
- b. Revise Item #13, Minimum Channel Operable from 0 to 1.
- c. Delete Footnote ###.

A mark-up of Technical Specification section affected by the proposed change is included as an attachment to this analysis.

ASSESSMENT

The following Safety Analysis and Conclusions address the proposed change in the channel operability values for Technical Specification Table 3.3.7.5-1, and the deletion of the ### footnote. Analysis regarding the use of the Neutron Monitoring System-APRM subfunction for post accident neutron monitoring under Regulatory Guide 1.97 has been performed separately. PP&L evaluated the Neutron Monitoring System (NMS) against the criteria established in General Electric NEDO-31558A to ensure its acceptability for post-accident monitoring. NEDO-31558A provides alternative criteria for the NMS to meet the post-accident monitoring guidance of Regulatory Guide 1.97. The NRC staff found NEDO-31558A acceptable, as documented in a NRC letter from B. A. Boger to C. L. Tully dated 1/13/93. PP&L concluded that APRM channels can be used in place of Ex-core channels for post-accident monitoring at Susquehanna.

Safety Analysis:

There are no safety ramifications associated with the revision of the channel operability values for Neutron Flux in Technical Specification Table 3.3.7.5-1. The values are being revised back to the values that have existed historically in the Technical Specification table. Susquehanna Unit 1 Technical Specifications contain the original values.

PP&L has been administratively controlling the channel operability values for Neutron Flux since implementing the changeover from Ex-core detectors to the APRMs. The administrative controls ensure that two (2) channels are required to be operable, with one (1) channel as a minimum. Approval of the proposed change will allow for the discontinuation of the administrative controls in favor of Technical Specification requirements.

Deletion of footnote ###, which was added as a result of Amendment 115, is an administrative action with no safety ramifications. Elimination of this notation is based on PP&L having reestablished the Neutron Flux function required by Technical Specifications.

Conclusions:

The proposed change to Table 3.3.7.5-1 reestablishes channel operability values that had been present in the table prior to the approval of Technical Specification Amendment 115. Implementing the proposed change will not impact plant safety margins, and there is no current impact as the channel operability values are being administratively controlled.

NO SIGNIFICANT HAZARDS CONSIDERATIONS

This analysis addresses the proposed change to Susquehanna SES Unit 2 Technical Specification Table 3.3.7.5-1 to reestablish the channel operability values for Item #13 which existed prior to Amendment 115. The proposed change will establish that there are two (2) required neutron flux channels for accident monitoring, and one (1) channel as a minimum. The proposed change also deletes footnote ###. Deletion of the footnote is an administrative action to remove extraneous information from the Technical Specification page.

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

Reestablishing the channel operability values in Item #13 of Technical Specification Table 3.3.7.5-1, and deleting footnote ###, has no impact on the probability or consequences of an accident previously evaluated. The proposed change in the channel operability values is a return to the values which were reviewed as part of the licensing basis.

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

Reestablishing the channel operability values in Item #13 of Technical Specification Table 3.3.7.5-1, and deleting footnote ###, does not create the possibility of a new or different kind of accident from any accident previously evaluated. The change in the channel operability values increases the required number of channels available for accident monitoring. There is no correlation between increasing the number of neutron flux accident monitoring channels available and the creation of accident scenarios.

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

Reestablishing the channel operability values in Item #13 of Technical Specification Table 3.3.7.5-1, and deleting footnote ###, does not involve a reduction in a margin of safety. The proposed change increases the number of required channels from current levels, and restores the values to those which have historically been required. At the present time, the number of required channels is being administratively controlled at the proposed levels to ensure conservatism in operability.

ENVIRONMENTAL CONSEQUENCES

An environmental assessment is not required for the proposed changes because the requested changes conform to the criteria for actions eligible for categorical exclusion as specified in 10 CFR 51.22(c)(9). The requested changes will have no impact on the environment. The proposed changes do not involve a significant hazards consideration as discussed in the preceding section. The proposed changes do not involve a significant change in the types or significant increase in the amounts of any effluents that may be released offsite. In addition, the proposed changes do not involve a significant increase in individual or cumulative occupational radiation exposure.

IMPLEMENTATION

It is requested that this change be approved as soon as possible with implementation within 30 days of the date of issuance.