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SUBJECT: Forwards amends 164 & 119 to liceses NPF-14 & NPF-22,  
 removing all frequency requirements for audits performed  
 under cognizance of plant review committee described in TS  
 4.5.2.8 in favor of existing FSAR commitments.

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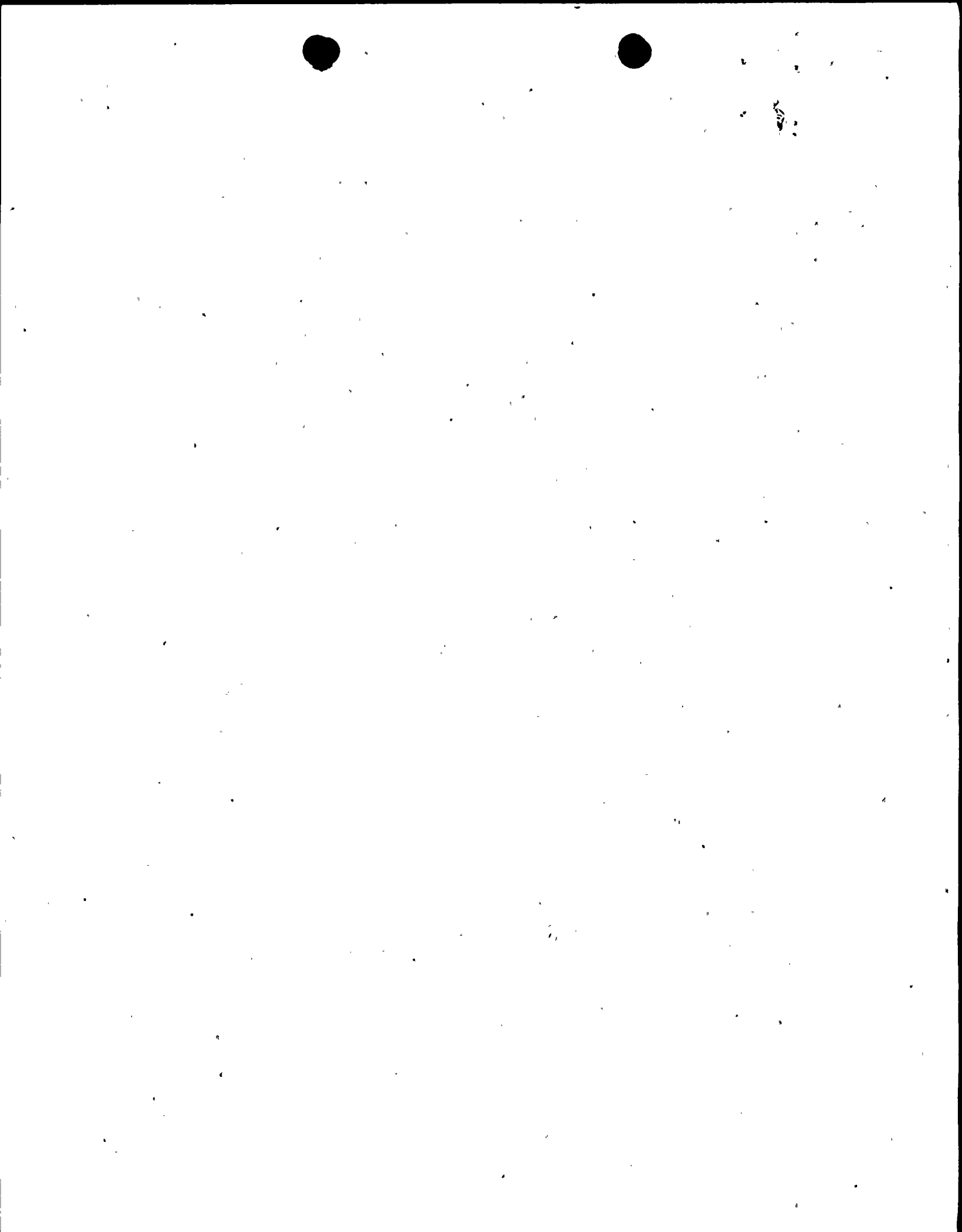
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# Pennsylvania Power & Light Company

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OCT 20 1995

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U.S. Nuclear Regulatory Commission  
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**SUSQUEHANNA STEAM ELECTRIC STATION  
REVISION TO PROPOSED AMENDMENT NO. 164 TO LICENSE NPF-14 AND  
REVISION TO PROPOSED AMENDMENT NO. 119 TO LICENSE NPF-22:  
SRC AUDIT FREQUENCY REQUIREMENTS  
PLA-4381** **FILES R41-2/A17-2**

*Reference: PLA-4113, dated April 5, 1994; SRC AUDIT FREQUENCY REQUIREMENTS.*

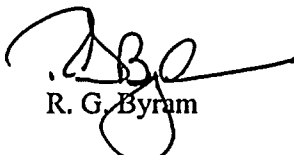
Pennsylvania Power & Light (PP&L) Company proposed changes to the Technical Specifications for Susquehanna SES Units 1 & 2 in the referenced letter. The requested changes would have removed all frequency requirements for audits performed under the cognizance of the Susquehanna Review Committee (SRC) as described in Technical Specification 6.5.2.8, in favor of existing FSAR commitments. The NRC approved most of the PP&L request in a letter and SER dated December 22, 1994, however; the NRC deferred approving the removal of fire protection SRC audit frequency requirements at that time.

Subsequent discussions with the NRC staff indicate that the fire protection SRC audit frequency requirements can now be removed from the Technical Specifications, since these same requirements are located in the FSAR. In addition, the NRC staff is agreeable to modifications of the wording of Technical Specification 6.5.2.8 to clarify its meaning in light of the relocation of SRC audit frequency requirements.

Attachment 1 includes a discussion of the proposed changes to PP&L's original submittal. We have reviewed the original safety analysis and No Significant Hazards Considerations associated with the proposed amendments in light of the wording change. We find that the clarification to the wording does not impact the intent of the proposed amendments, and that the analysis performed in support of the original amendments remains valid for the wording change. Markups of the affected Technical Specifications are attached to this letter.

Any questions regarding this request should be directed to Mr. Terence Bannon at (610) 774-4019.

Very truly yours,



R. G. Byram

Attachment

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PDR ADDCK 05000387  
PDR

A001  
11/11



copy: Regional Administrator - Region I  
Ms. M. Banerjee, NRC Sr. Resident Inspector  
Mr. C. Poslusny, Jr., NRC Sr. Project Manager  
Mr. W. P. Dornsife, Pa. DEP

<b>DISCUSSION OF AMENDMENT CHANGES</b>
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**REMOVAL OF SRC AUDIT FREQUENCY REQUIREMENTS**

In PLA-4113, PP&L requested that the SRC audit frequency requirements defined in Technical Specification 6.5.2.8 be eliminated. PP&L proposed continuing to perform the subject audits in accordance with FSAR Section 13.4.3 and ANSI N18.7-1976. Audits would be performed at an interval not to exceed 24 months.

The NRC approved PP&L's amendment request on December 22, 1994, but deferred approval of the requested changes regarding fire protection SRC audits. Subsequent discussions with the NRC staff indicate that the frequency requirements for the fire protection SRC audits can now be removed from Technical Specification 6.5.2.8. The NRC is agreeable to the transfer of the frequency requirements to the FSAR for the fire protection SRC audits. PP&L has already included the fire protection SRC audit requirements, at their identified frequencies, in FSAR Section 13.4.3.

**CLARIFICATION OF TECHNICAL SPECIFICATION 6.5.2.8**

Susquehanna SES Technical Specification 6.5.2.8 currently contains three individual fire protection audit requirements as listed below:

- f. The Fire Protection Program and implementing procedures at least once per 24 months.
- g. An independent fire protection and loss prevention inspection and audit shall be performed at least once per 12 months utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- h. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 36 months.

The proposed change to remove the frequency requirements from the audit statements will leave items g. and h. as largely redundant. PP&L proposes rewording items (g.) and (h.) into one statement which will be labeled item (g.). The wording for the revised item is:

- g. An independent fire protection and loss prevention inspection and audit shall be performed utilizing qualified offsite licensee personnel and/or an outside fire protection firm.

FSAR Section 13.4.3 contains the three individual audit statements with their respective frequency requirements.



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