

December 6 1995

Mr. Robert G. Byram
Senior Vice President Nuclear
Pennsylvania Power and Light
Company
2 North Ninth Street
Allentown, PA 18101

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - UPCOMING MEETING REGARDING
THE FIRE PROTECTION PROGRAMS AND SAFE SHUTDOWN CAPABILITY FOR THE
SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 and 2 (TAC NOS.
M84770, M84771, M90600 AND M90601)

Dear Mr. Byram:

On August 29, 1995, NRC staff and a contractor from Brookhaven National Laboratory (BNL) met with Pennsylvania Power & Light Company (PP&L) representatives to discuss the safe shutdown analysis for the Susquehanna Steam Electric Station (SSES) Units 1 & 2 and a previously submitted request for exemption from Appendix R related to control room hot shorts. Our BNL reviewer has identified some additional issues which need to be addressed or clarified in order to reach conclusions on the adequacy of the safe shutdown analysis and the justification for an exemption from Appendix R.

I have enclosed a request for additional information on Revision 4 of the PP&L Fire Protection Review Report and PP&L Calculation EC-013-0859, "Appendix R Safe Shutdown Analysis for a Control Room Fire," Revision 1.

The level of detail included in the enclosure require that a face to face meeting be conducted to ensure that the NRC fully understands PP&L's fire protection programs and strategy for safe shutdown. Accordingly, please have your staff review this document and be prepared to provide responses and comments during the next meeting with the NRC and BNL staff. We and our contractor are prepared to meet with your staff at your earliest convenience at your Allentown office or at the SSES site. Please have your staff contact me with a proposed date for this meeting.

This requirement affects nine or fewer respondents and, therefore, is not subject to the Office of Management and Budget review under P.L. 96-511.

Sincerely,
/s/

Chester Poslusny, Senior Project Manager
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

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Docket Nos. 50-387/388

Enclosure: Request for Additional
Information

cc w/encl: See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001
December 6, 1995

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Pennsylvania Power and Light
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Sincerely,

A handwritten signature in cursive script that reads "Chester Poslusny".

Chester Poslusny, Senior Project Manager
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket Nos. 50-387/388

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Information

cc w/encl: See next page

Mr. Robert G. Byram
Pennsylvania Power & Light Company

Susquehanna Steam Electric Station,
Units 1 & 2

cc:

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REQUEST FOR ADDITIONAL INFORMATION

SUSQUEHANNA STEAM ELECTRIC STATION (SSES), UNITS 1 AND 2

OBSERVATIONS ON SSES FIRE PROTECTION PROGRAMS

AND SAFE SHUTDOWN ANALYSIS

1. In Section 5.2 of the Control Room Analysis (CRA), PP&L stated:

"Each component and associated cable identified in section 5.1 was reviewed to determine whether proper isolation of the cable exists. If isolation exists, component operability is assured outside the Control Room, and thus no further review was performed."

From this statement, it appears that if a component required to achieve alternative shutdown from outside the Control Room was provided with electrical isolation capability (i.e., an isolation/transfer switch), PP&L assumed that no further review was necessary since fire damage would not occur prior to transfer. Such an assumption appears to be contrary to NRC staff positions contained in Generic Letter 86-10 (Response to Question 5.3.10), Information Notice (IN) 85-09 and IN 92-18.

2. Section 7.3 of the CRA, a number of modifications were discussed which were necessary to resolve deficiencies in the alternative SD capability. These included: installation of a new alternative shutdown control panel for Control Structure HVAC, installation of new temperature switches to support EDG and ESW HVAC requirements, and isolation of EDG control circuits from fire damage. These modifications were not discussed in Revision 4 of the FPRR.
3. In Section 4.4.3 of the CRA PP&L stated that equipment damage due to hot shorts was not postulated based on the low probability of this condition affecting SSD. This appears to be contradictory to NRC concerns identified in IN 92-18.
4. PP&L in its submittal dated May 22, 1995, stated that no repair activities are required to achieve hot shutdown conditions. Notwithstanding this statement, the licensee's two procedures ON-100-009, and ON-200-009, "Control Room Evacuation," each Revision 3, for Units 1 and 2 respectively, in Step 4.3.4, instruct the plant operators to:

"NOTIFY I&C to install: (a) Temporary (reactor) level indication, and (b) Temporary reactor coolant temperature indication..."

As noted in IN 84-09, the staff considers reactor level indication as part of the minimum required instrumentation for alternative SSD for a BWR. Since none of the approved or pending deviation requests appear to be related to a request by PP&L to seek approval for a Hot Shutdown repair to install temporary reactor level instrumentation, PP&L should explain why step "a", which is to be performed immediately after control has been established at the Remote Shutdown Panels, (i.e., in the early stages of Hot Shutdown) does not constitute a repair necessary to achieve and maintain hot shutdown.

Enclosure

5. Section 6 of the Appendix R Analysis for a Control Room Fire identifies 17 calculations performed by PP&L in support of its SSD Analysis. These calculations are not referenced in the FRR. PP&L should have these calculations available for review.