

# CATEGORY 1

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ACCESSION NBR: 9605240019 DOC. DATE: 96/05/20 NOTARIZED: NO DOCKET #  
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 50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylv 05000388  
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SUBJECT: Provides partial response to NRC ltr dtd 960223, containing SE for Revs 12 Unit 1 & 9 for Unit 2 & also included SE for Relief Request 23. Rev 14 to ISI-T-100.0 & Rev 11 to ISI-T-200.0 encl also.

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**SUSQUEHANNA STEAM ELECTRIC STATION  
REVISIONS 14 AND 11 TO THE INSERVICE  
INSPECTION PLAN FOR PUMP AND VALVE  
OPERATIONAL TESTING FOR UNITS 1 AND 2  
PLA-4462 FILE R41-2**

Docket Nos. 50-387  
and 50-388

This letter provides a partial PP&L response to the NRC's letter dated February 23, 1996, which contained the Safety Evaluation for Revisions Nos. 12 for Unit 1 and 9 for Unit 2, and also included a Safety Evaluation for Relief Request No. 23 that was submitted to the NRC in a letter dated August 4, 1995 (PLA-4340). Revisions Nos. 14 for Unit 1 and 11 for Unit 2 are included as an attachment to this letter and provide a revision to Relief Request No. 23. Response to the NRC comments on Refuel Outage Test Justification No. 21 will be submitted under separate cover.

The following summarizes PP&L's response to the comments contained in the Safety Evaluation for Relief Request No. 23 that was sent to PP&L on February 23, 1996.

**SER 3.0 RELIEF REQUEST NO. 23 EXCESS FLOW CHECK VALVES**

**NRC EVALUATION:**

The proposed alternative to the Code testing frequency is denied, in part, because the licensee has not adequately justified why these valves should be tested at power immediately before refueling outages. However, pursuant to CFR 50.55a(f)(6)(i), the licensee is granted relief from the quarterly Code testing requirements for the subject EFCV's provided the licensee tests these valves during refueling outages. If the licensee seeks to test these EFCV's at power immediately before each refueling outage then a more detailed basis (e.g., maintenance history, risk analysis) for the proposed test interval should be provided (i.e., to demonstrate that the alternate provides an acceptable level of quality and safety).

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**PP&L RESPONSE:**

Relief Request No. 23 was revised to adequately justify why these valves should be tested at power immediately before refueling outages. The revised Relief Request documents the hardship associated with testing all the subject EFCV's during a refueling outage and also explains why the alternative provides an acceptable level of quality and safety.

It has been determined that performing all EFCV testing exclusively during refueling outages provides a hardship without a compensating increase in safety. Since the design of the systems does not provide test taps, the testing must be done using reactor pressure >500 psig. The appropriate time for performing these tests during refueling outages is during vessel hydrostatic testing. Due to shorter refueling outages, decay heat levels during hydrostatic testing are higher than in the past. Extending the vessel hydro to perform EFCV testing could jeopardize successful and timely completion of the vessel hydro test due to reaching limiting vessel temperatures for the hydro condition. Also, the addition of EFCV testing would become critical path for the refuel outage and could add up to 2 days to the outage schedule.

The proposed test frequency to perform certain EFCV testing once a refuel cycle immediately before a refueling outage will provide an acceptable level of quality and safety since the appropriate administrative and scheduling controls will be instituted prior to performing the testing. The scheduling of each test will ensure that the resulting action statement and limiting condition of operation will encompass the planned shutdown for the refueling outage, precluding any unplanned, unnecessary plant shutdowns.

Also, the maintenance history for these EFCV's supports the conclusion that these valves have been highly reliable over the life of the plant. The combined testing failures between both SSES units over the life of the plant showed a failure rate of <1%. The review of the surveillance test history showed no evidence of time based failure mechanisms or common mode failures associated with the excess flow check valves.

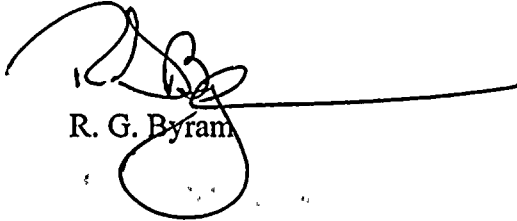
In summary, considering the low failure rate, personnel and plant safety concerns and the hardship of testing during refueling outages, Excess Flow Check Valve testing at a frequency greater than once per operating cycle and exclusively during refueling outages is impractical and results in a hardship without a compensating increase in the level of safety.

This request for relief is similar to a request that was granted by NRC to PECO for use at Peach Bottom.

We request your review and approval by August 15, 1996, in order to support the testing plans for excess flow check valves prior to the Unit 1 9th RIO, which is scheduled to begin on September 7, 1996.

If you have any questions, please contact Mr. C. T. Coddington at (717) 542-3289.

Very truly yours,

A handwritten signature in black ink, appearing to be "R. G. Byram", is written over a horizontal line. The signature is stylized and includes a large loop at the end.

R. G. Byram

Attachments

copy: NRC Region I  
Ms. M. Banerjee, NRC Sr. Resident Inspector  
Mr. C. Poslusny, NRC Sr. Project Manager