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SUBJECT: Forwards Revs 15 & 12 to ISI Plan for Pump & Valve
Operational Testing for Units 1 & 2, clarifying minor tabular
discrepancies & responding to NRC evaluation re ROJ-21,
"Fuel Pool Cooling Manual Valves."

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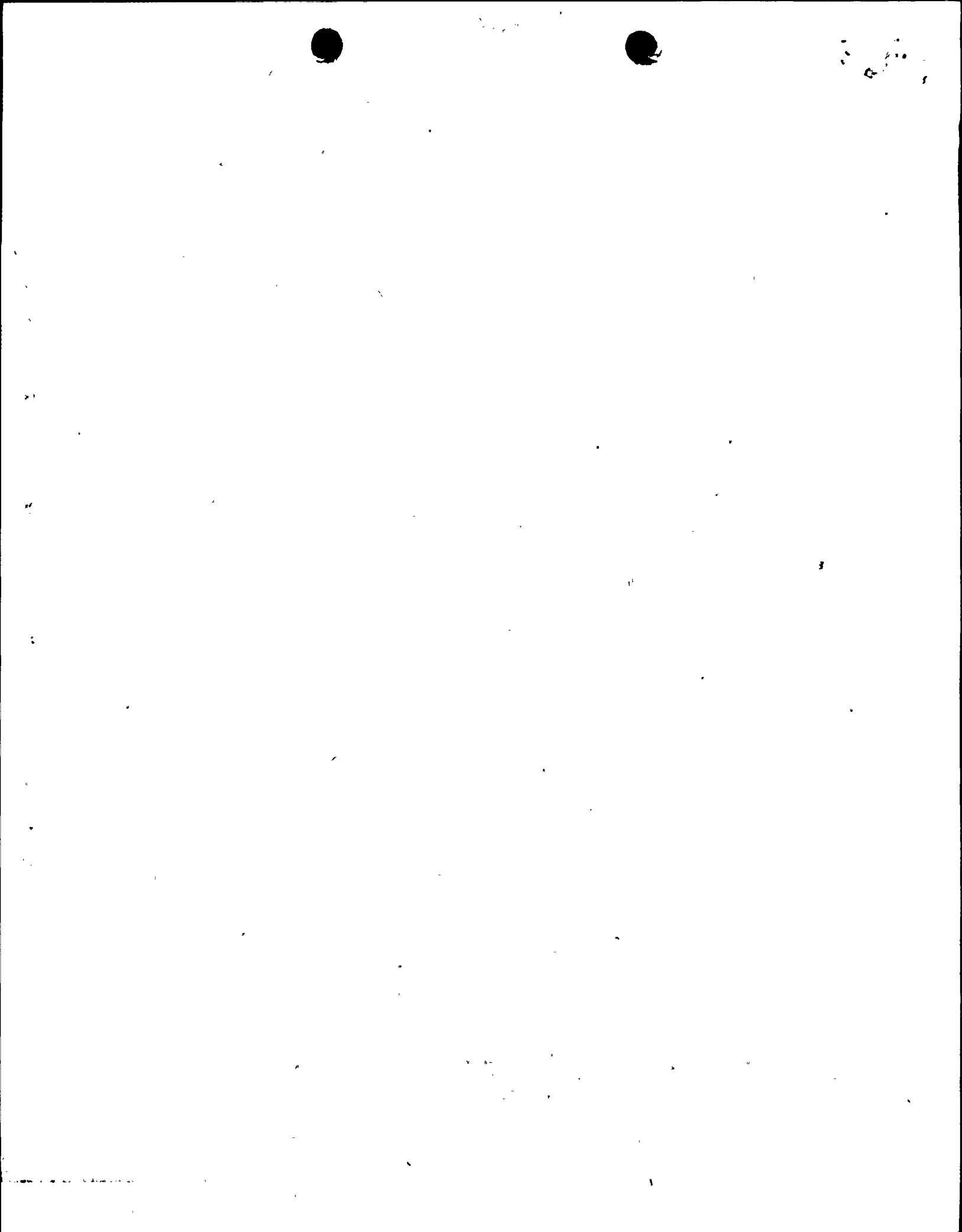
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U.S. Nuclear Regulatory Commission
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**SUSQUEHANNA STEAM ELECTRIC STATION
REVISIONS 15 AND 12 TO THE INSERVICE
INSPECTION PLAN FOR PUMP AND VALVE
OPERATIONAL TESTING FOR UNITS 1 AND 2
PLA-4467 FILE R41-2**

Docket Nos. 50-387
and 50-388

The attachment to this letter, Revisions Nos. 15 for Unit 1 and 12 for Unit 2 to the Inservice Inspection Plan for Pump and Valve Operational Testing, completes Pennsylvania Power & Light Company's response to the NRC's letter dated February 23, 1996. These attachments clarify some minor tabular discrepancies and provide our response to the NRC evaluation concerning ROJ-21, "Fuel Pool Cooling Manual Valves."

The following is a summary of the NRC evaluation and PP&L's response:

**SER 2.0 REFUELING OUTAGE TEST JUSTIFICATION NO. 21 FUEL
POOL COOLING MANUAL VALVES**

NRC EVALUATION:

The licensee should review and revise ROJ-21 to ensure that it contains only manual valves that are impractical to test in accordance with the ASME Code. Other manual valves should be tested in accordance with the Code or the licensee should request that an alternative to the Code testing be authorized by the NRC. In this instance, the licensee may wish to document the hardship associated with testing these valves quarterly and during cold shutdown conditions and explain why testing these valves once each refueling outage does not adversely impact the level of quality and safety.

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PP&L RESPONSE:

The Refuel Outage Test Justification No. 21 is being withdrawn from the program plan per these revisions and Relief Request No. 33 is being submitted to request authorization for an alternative to the quarterly Code testing frequency. Relief Request No. 33 documents the hardship associated with testing these valves quarterly and during cold shutdown conditions and explains why a testing frequency of once each refuel cycle does not compromise the level of quality and safety.

The following is a summary of the changes made to each page of the IST Program Plan for Unit 1:

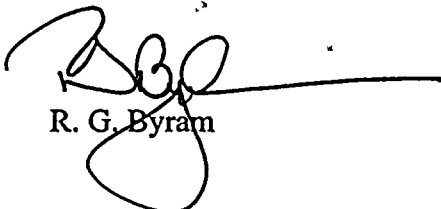
PAGE	REVISION
1VT-72	For Valve 151070, the reference to Refueling Outage Justification RJ21 has been deleted and the reference to Relief Request 33 has been added.
1VT-78	Valve SV-151F080A was added to the Program Plan via Revision 13; however, the valve listing was inadvertently excluded from the Valve Table.
1VT-79	For Valve 151060, the reference to Refueling Outage Justification RJ21 has been deleted and the reference to Relief Request 33 has been added.
1VT-86	Valve SV-151F080B was added to the Program Plan via Revision 13; however, the valve listing was inadvertently excluded from the Valve Table.
1VT-93	For Valves 153001, 153018A/B, 153021, 15070A/B, 153090A/B, 153091A/B, 153500, and 153501, the reference to Refueling Outage Justification RJ21 has been deleted and the reference to Relief Request 33 has been added.
1RJ21-1	Refueling Outage Justification No. 21 has been withdrawn from the Program Plan.
1RJ21-1 and 1RJ21-3	These pages have been deleted from the Program Plan.
1RR33-1 and 1RR33-2	Relief Request 33 has been added to the Program Plan.

The following is a summary of the changes made to each page of the IST Program Plan for Unit 2:

PAGE	REVISION
2VT-60	For Valve HV-250F045, the Actuator Type was corrected from 'AO' to 'MO'.
2VT-62	For Valve 251070, the reference to Refueling Outage Justification RJ21 has been deleted and the reference to Relief Request 33 has been added.
2VT-68	Valve SV-251F080A was added to the Program Plan via Revision 10; however, the valve listing was inadvertently excluded from the Valve Table.
2VT-69	For Valve 251060, the reference to Refueling Outage Justification RJ21 has been deleted and the reference to Relief Request 33 has been added.
2VT-76	Valve SV-251F080B was added to the Program Plan via Revision 10; however, the valve listing was inadvertently excluded from the Valve Table.
2VT-83	For Valves 253001, 253018A/B, 253021, 25070A/B, 253090A/B, 253091A/B, 253500, and 253501, the reference to Refueling Outage Justification RJ21 has been deleted and the reference to Relief Request 33 has been added.
2RJ21-1	Refueling Outage Justification No. 21 has been withdrawn from the Program Plan.
2RJ21-1 and 2RJ21-3	These pages have been deleted from the Program Plan.
2RR33-1 and 2RR33-2	Relief Request 33 has been added to the Program Plan.

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

Very truly yours,



R. G. Byram

Attachments



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

