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SUBJECT: Responds to NRC Bulletin 96-003, "Potential Plugging of ECCS Suction Strainers by Debris in Boiling Water Reactors."

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SUSQUEHANNA STEAM ELECTRIC STATION
RESPONSE TO BULLETIN 96-03
POTENTIAL PLUGGING OF ECCS SUCTION STRAINERS
PLA-4523 FILE R41-2

Docket Nos. 50-387
and 50-388

References: *(1) NRC Bulletin 96-03, "Potential Plugging of Emergency Core Cooling Suction Strainers by Debris in Boiling Water Reactors," dated May 6, 1996.*

(2) PP&L Letter No. PLA-4512, "Interim Response to Bulletin 96-03, Request for One-Cycle Deferral for Unit 2," dated October 4, 1996

The purpose of this letter is to respond to the requested actions of NRC Bulletin 96-03, "Potential Plugging of Emergency Core Cooling Suction Strainers by Debris in Boiling Water Reactors." The Bulletin requests that addressees implement appropriate procedural measures and plan modifications to minimize the potential for clogging of ECCS suction strainers by debris during a loss-of-coolant accident (LOCA). It further requires that addressees report the extent to which the requested actions will be taken and notify the NRC upon completion. Specifically, the Bulletin requires:

(1) This 180 day report indicating whether the addressee intends to comply with requested actions, including a description of planned actions and mitigative strategies to be used, the schedule for implementation and proposed Technical Specifications, if appropriate.

(2) Within 30 days of completion of all requested actions, submittal of a report confirming completion and summarizing any actions taken.

Please note that this letter supplements our interim response to the subject Bulletin (Reference #2), which requested a one-cycle deferral of actions for Unit 2 from the Spring '97 outage. This supplemental letter addresses both units, consistent with response requirements contained within the Bulletin.

IE13

The description of plant conditions and previous actions described in Reference #2 for Unit 2, are essentially the same for Unit 1. Note that in 1993, PP&L replaced Nukon fibrous insulation within 7 pipe diameters of high-energy line break locations (as postulated in the FSAR) with stainless-steel reflective metallic insulation (RMI) in both units. These modifications followed the guidance of Regulatory Guide 1.82, Revision 1 with respect to determining the break zone of destruction. Removal of the fibrous insulation in this zone of influence reduced the remaining fibrous insulation in the drywells of both units to approximately 2-5% of the total insulation inventory.

Although PP&L has a relatively small fiber source term, our preferred option is replacement of the existing RHR and Core Spray conical strainers with alternate-geometry, passive strainers with sufficient capacity to combat the threat posed by the suction strainer plugging scenario. (This corresponds to "Option #1," as delineated in Bulletin 96-03.) We believe that this action will minimize any "thin-bed" effects associated with our current conical strainers, and provide ample margin over actual debris source terms.

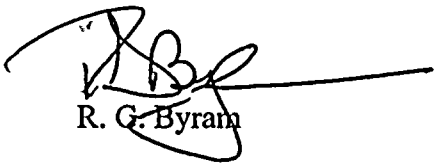
The design of the strainer will be based primarily upon the Utility Resolution Guidance (URG) developed by the BWROG, and the installed components will meet or exceed the design, fabrication and testing standards established for the ECCS. Given that the technical basis defined by the URG has not yet been approved, at this time PP&L cannot provide a detailed description of the safety basis for the strainer design and associated mitigative strategies. However, PP&L will provide a supplemental submittal describing its application of the URG, following approval of the URG and prior to installation of the new strainers.

In response to the Bulletin requirement to include a description of proposed Technical Specifications, PP&L believes that it would be premature to develop Technical Specification surveillance requirements prior to the development of final design requirements. Further, we propose that the issue be reviewed using the existing industry/NRC process for reviewing generic Technical Specification requirements and ensuring consistent industry implementation. Based upon the outcome of this review and following development of the final design, PP&L will establish the appropriate mechanisms for controlling design inputs to the strainer sizing calculation.

As described in Reference #2, our proposed schedule for strainer modifications to Unit 2 is in the ninth refueling outage in Spring 1999. Unit 1 strainers will be replaced in the next scheduled refueling outage in Spring 1998.

If you have any additional questions, please contact Ms. K.R. Leone at (610) 774-4023.

Very truly yours,



R. G. Byram

copy: NRC Region I
Mr. K. Jenison, NRC Sr. Resident Inspector, SSES
Mr. C. Poslusny, NRC Sr. Project Manager, OWFN

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA)
: SS
COUNTY OF LEHIGH)

I, ROBERT G. BYRAM, being duly sworn according to law, state that I am Senior Vice President - Nuclear of Pennsylvania Power & Light Company and that the facts set forth on the attached Response to Bulletin 96-03 issued pursuant to 10CFR50.54(f) are true and correct to the best of my knowledge, information and belief.

Robert G. Byram
Senior Vice President - Nuclear

Sworn to and subscribed
before me this 27th day
of November, 1996.

Martha C. Sedora
Notary Public

Notarial Seal
Martha C. Sedora, Notary Public
Allentown, Lehigh County
My Commission Expires Jan. 15, 1998
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