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AUTH. NAME AUTHOR AFFILIATION

BYRAM, R.G. Pennsylvania Power & Light Co.

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SUBJECT: Requests that NRC expedite review & approval of proposed Improved TS amend as it applies to current TS Sections

3/4.3.7.11 & 3/4 11.2.6.

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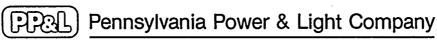
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Robert G. Byram Senior Vice President-Nuclear 610/774-7502 Fax: 610/774-5019

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U. S. Nuclear Regulatory Commission Attn.: Document Control Desk Mail Stop P1-137 Washington, D. C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION
EXPEDITED REVIEW/APPROVAL OF TECHNICAL
SPECIFICATION SECTIONS/BASES 3/4.3.7.11 AND
3/4.11.2.6 PURSUANT TO ITS
PLA-4564 FILE R41-2

Docket Nos. 50-387/NPF-14 and 50-388/NPF-22

- References: 1) PLA-4488, R. G. Byram to US NRC, "Proposed Amendment No. 203 to License NPF-14 and No. 161 to License NPF-22: Conversion of the SSES Technical Specifications to the Improved Standard Technical Specifications, NUREG 1433," dated August 1, 1996.
  - 2) PLA-4508, R. G. Byram to US NRC, "Deletion of Hydrogen Isolation in Technical Specification Bases," dated October 7, 1996.

The purpose of this letter is to request that NRC expedite the review and approval of the proposed Improved Technical Specification Amendment (reference 1) as it applies to current Technical Specification Sections 3/4.3.7.11 and 3/4 11.2.6. This letter supersedes PP&L's letter dated October 7, 1996 (reference 2) titled "Deletion of Hydrogen Isolation in Technical Specification Bases," and modifies it to be consistent with our Improved Technical Specification (ITS) submittal. This expedited review/approval request is being made to support the installation of Hydrogen Water Chemistry (HWC) at the Susquehanna Steam Electric Station (SSES).

The ITS proposed amendment relocates the current Technical Specification section 3/4.3.7.11 to the Technical Requirements Manual (TRM). ITS also replaces the current Technical Specification section 3/4.11.2.6 with a "surveillance program" in the Administrative Controls section.

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## **Basis for Change**

The affected Technical Specification sections 3/4.3.7.11 discuss hydrogen monitoring instrumentation. As part of HWC installation, PP&L has determined that the existing isolation function of this instrumentation could create inadvertent plant transients (trips) if the HWC system malfunctions. Specifically, under HWC, a failure of oxygen injection could result in a transient increase in hydrogen sufficient to cause an isolation of the offgas system. Isolation of the offgas system will ultimately lead to a plant trip. Upon approval of this request, PP&L plans to resolve this concern via changes that will be evaluated in accordance with 10CFR50.59.

The proposed ITS amendment also replaces the current Technical Specification 3/4.11.2.6 and creates a new "surveillance program" which is located in the Administrative Controls section of ITS. This change is also being requested because Surveillance Requirement 4.11.2.6 references Specification 3/4.3.7.11, which is proposed to be relocated. Marked up pages of current Technical Specification section 3/4.3.7.11 and section 3/4.11.2.6 reflecting the requested change and the new surveillance program are attached. NRC has approved the following licensees Improved Technical Specification Amendments which contain an Administrative Controls surveillance program to control explosive gas and storage tank radioactivity: Hatch (Units 1 and 2), Grand Gulf and Clinton. This requested change has been previously submitted by PP&L (reference 1); therefore, the No Significant Hazards Considerations Determination noticed for the referenced proposed Amendment remains valid.

PP&L requests approval of these changes by May 15, 1997, to preclude a delay in the implementation of the HWC modification efforts.

Please contact R. D. Kichline at (610) 774-7705 with any questions concerning this submittal.

Very truly yours

R. G. Byram

Attachment

FILE R41-2 PLA-4564 Document Control Desk

copy: NRC Region I Mr. K. Jenison

Mr. K. Jenison NRC Sr. Resident Inspector Mr. C. Poslusny, Jr. NRC Sr. Project Manager