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SUBJECT: Clarifies basis for emergency amend request submitted to NRC on 970416.

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**SUSQUEHANNA STEAM ELECTRIC STATION
REVISION TO PROPOSED AMENDMENT NO. 169
TO LICENSE NPF-22 : CLARIFICATION OF BASIS
FOR EMERGENCY REQUEST**

PLA-4617

FILES A17-2/R41-2

Docket No. 50-388

- References:*
1. PLA-4582, "Addendum to Proposed Amendment No 166 to License NPF-22: Revised ANFB Methodology and Core Flow Dependent MCPR Safety Limits," dated March 12, 1997.
 2. PLA-4587, "Proposed Amendment No. 167 to License NPF-22: Changes to Support Operational Condition 5 Fuel Loading of ATRIUM™-10," dated March 17, 1997.
 3. PLA-4595, "Response to NRC Request for Additional Information on Siemens' Report EMF-97-010, Rev. 1", dated March 27, 1997.
 4. PLA-4605, "Response to NRC Request for Additional Information on PP&L's Proposed Amendment No. 166 to License No. NPF-22: Unit 2 Technical Specification Changes for ATRIUM™-10 Fuel," dated April 9, 1997.
 5. PLA-4610, "Proposed Amendment No. 169 to License No. NPF-22: Emergency Request to Allow Continuation of Unit 2 Outage to Operational Condition 3," dated April 16, 1997.
 6. PLA-4527, "Proposed Amendment No. 166 to License No. NPF-22: Unit 2 Technical Specification Changes for ATRIUM™-10 Fuel," December 18, 1996.

The purpose of this letter is to clarify the basis for the emergency amendment request submitted to you on April 16, 1997 (Reference 5). The focus of this clarification is why this request was not part of the scope of the exigent change submitted on March 17, 1997 (Reference 2).

Basis for Scope of March 17, 1997 Request

In February 1997, the NRC performed an inspection of SPC as a prerequisite to reviewing and approving PP&L's request to utilize ATRIUM™-10 fuel for SSES Unit 2 Cycle 9 operation. At the exit from this inspection, the NRC indicated that PP&L's original Proposed Amendment (Reference 6) would have to be revised, and that they would be following up during the week of March 17, 1997 to close open issues from their inspection and approve the revised methodology.

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PP&L subsequently held further conversations with the staff, including a determination that ATRIUMTM-10 could not be loaded into the core due to it not being described in the Design Features section of Tech Specs. In mid-March it became clear that NRC's review schedule would not support PP&L's fuel load schedule, which was scheduled for April 5, 1997. Therefore, on March 17, PP&L submitted an exigent amendment that would support loading fuel and would only apply during Operational Condition 5; this amendment was subsequently approved on April 9, 1997.

The March 17 submittal did not contain a proposal to proceed to Operational Condition 3 because the NRC continued to have a number of outstanding questions that could have potentially impacted their ability to expeditiously issue the change. PP&L felt that operation in Operational Condition 5 was non-impacting to these issues, and therefore focused the change on this specific milestone.

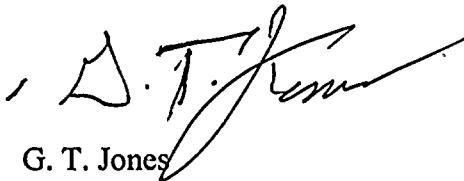
Basis for April 16, 1997 Emergency Request

Since making the proposal on March 17, PP&L has been in regular contact with the NRC, and has provided responses to requests for information on March 27 (Reference 3) and April 9 (Reference 4). These RAIs focused on the basis for appropriate Safety Limits for Unit 2 Cycle 9 operation. We currently believe that it is appropriate to request approval to proceed to Operational Condition 3 based on these interactions.

The current Unit 2 outage status anticipates readiness to proceed to Operational Condition 4 on April 19, 1997.

Any further questions on this subject should be directed to Mr. J. M. Kenny at (610) 774-7535.

Very truly yours,



G. T. Jones

Attachment

copy: NRC Region I
Mr. K. Jenison, NRC Sr. Resident Inspector
Mr. C. Poslusny, Jr., NRC Sr. Project Manager
Mr. W. P. Dornsife, Pa. DEP