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SUBJECT: Forwards application for amend to license NPF-22, requesting changes to footnote in Design Feature Section 5.3.1 to allow use of ATRIUM-10 fuel in Operational Conditions 3 & 4.

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APR 16 1997

U.S. Nuclear Regulatory Commission  
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**SUSQUEHANNA STEAM ELECTRIC STATION  
PROPOSED AMENDMENT NO. 169 TO LICENSE  
NO. NPF-22: EMERGENCY REQUEST TO ALLOW  
CONTINUATION OF UNIT 2 OUTAGE TO  
OPERATIONAL CONDITION 3  
PLA-4610**

**FILE A17-2/R41-2**

**Docket No. 50-388**

- References:
- 1) PLA-4527, "Proposed Amendment No. 166 to License NPF-22: Unit 2 Technical Specification Changes for ATRIUM™-10 Fuel," December 18, 1996.
  - 2) PLA-4572, "Correction to Proposed Amendment No. 166 to License NPF-22: Unit 2 Technical Specification Changes to ATRIUM™-10 Fuel," February 26, 1997.
  - 3) PLA-4582, "Addendum to Proposed Amendment No. 166 to License NPF-22: Revised ANFB Methodology and Core Flow Dependent MCPR Safety Limits," March 12, 1997.
  - 4) PLA-4587, "Proposed Amendment No. 167 to License NPF-22: Changes to Support Operational Condition 5 Fuel Loading of ATRIUM™-10," March 17, 1997.
  - 5) PLA-4595, "Response to NRC Request for Additional Information on Siemens' Report EMF-97-010, Rev. 1," March 27, 1997.
  - 6) 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," April 9, 1997.
  - 7) NRC Letter, "Susquehanna Steam Electric Station, Unit 2 (TAC No. M98166)," April 9, 1997.

The purpose of this letter is to request an emergency change to the Susquehanna Steam Electric Station (SSES) Unit 2 Technical Specifications. References 1, 2, and 3 describe proposed changes to the Unit 2 Technical Specifications to support the scheduled use of Siemens Power Corporation (SPC) ATRIUM™-10 fuel. Upon approval of References 1, 2, and 3, the emergency changes proposed herein will be superseded. This proposed emergency change relies solely on existing NRC approved codes and methods, and will support completion of the Unit 2 8th Refueling and Inspection Outage by allowing continuation of the outage to Operational Condition 3 which includes activities such as vessel reassembly and hydrostatic testing. The reactor core will be restricted to subcritical operation.

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### Background

PP&L submitted its proposal for amendment (Reference 1) to allow the use of ATRIUM™-10 fuel in December of 1996. During its preliminary review, the NRC concluded that approval of PP&L's proposed amendment would need to be delayed until a preplanned inspection of Siemens Power Corporation (SPC) was conducted. Issues relating to the analytical basis for the use of ATRIUM™-10 fuel surfaced during this NRC inspection of SPC and have caused an unanticipated delay in completing the requested Reference 1 review. Resolution of these issues appear to be in their final stages, and upon conclusion, approval to use ATRIUM™-10 fuel is expected. However, to mitigate the impact on the current outage schedule, PP&L is requesting an amendment of the SSES Unit 2 Operating License pursuant to the provisions of NRC regulations in 10 CFR 50.91(a)(5) pertinent to an emergency situation to allow the continuation of the Unit 2 outage to Operational Condition 3 with ATRIUM™-10 fuel loaded in its core.

### Description of Proposed Change

PP&L has obtained NRC approval to load the Unit 2 core with the fuel ATRIUM™-10 (Reference 7), however, Unit 2 is currently restricted to Operational Condition 5. This request for an emergency change will allow continuation of the outage and the completion of activities such as vessel reassembly and hydrostatic testing, and as stated above, relies solely on existing NRC approved codes and methods. Specifically, PP&L is requesting changes to the footnote in the Design Feature Section 5.3.1 to allow use of ATRIUM™-10 fuel in Operational Conditions 3 and 4.

### Basis for Emergency Request

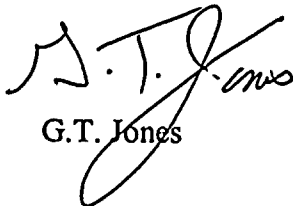
PP&L's request for an emergency change has primarily resulted from an unanticipated delay in the review and approval of the Reference 1 proposed amendment. This delay causes a threat to PP&L's ability to complete the Unit 2 8th Refueling and Inspection Outage as planned, and return Unit 2 to operation. Current schedules call for the completion of outage related activities in Operational Condition 5 on April 19, 1997. A delay in the initiation of outage activities in Condition 4 is expected to result in a delay to SSES Unit 2 operation. To support the current Unit 2 outage schedule and to minimize the impact of any potential delays, PP&L is proposing to revise the Operational Condition restriction of Condition 5 to include Conditions 3 and 4.

The need for this emergency change has arisen as a result of the NRC's conclusion that approval of PP&L's proposed amendment would need to be delayed until a preplanned inspection of Siemens Power Corporation was conducted. Issues relating to the analytical basis for the use of ATRIUM™-10 fuel surfaced during this NRC inspection of SPC and have caused an unanticipated delay in completing the requested Reference 1 review. PP&L did not anticipate the need for this NRC inspection of SPC to support its review and approval of the Reference 1 proposed amendment. The resultant consequences have made this situation unavoidable. Further, upon issuance of the final reload approval, the NRC is requested to supersede this request for emergency change with those changes originally proposed in References 1, 2, and 3.

Enclosure A to this letter is the "Safety Assessment" supporting this change. Enclosure B is the "No Significant Hazards Considerations" determination performed in accordance with the criteria of 10 CFR 50.92. Enclosure C to this letter contains the applicable pages of the SSES Unit 2 Technical Specifications, marked to show the proposed changes. The proposed changes have been approved by the SSES Plant Operations Review Committee and reviewed by the Susquehanna Review Committee.

PP&L plans to implement the proposed changes April 19, 1997 to support current Unit 2 outage schedule. Therefore, we request NRC complete its review of this change request by April 18, 1997 to support our scheduled implementation dates. Any questions regarding this emergency change request should be directed to Mr. A. K. Maron at (610) 774-7727.

Very truly yours,



G.T. Jones

Attachments

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