

CATEGORY 1

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SUBJECT: Requests withdrawal of LER 94-015 re SGTS & reactor building recirculation sys single failure issues. Info provided may be useful in resolving unresolved items.

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**SUSQUEHANNA STEAM ELECTRIC STATION
STANDBY GAS TREATMENT SYSTEM AND
REACTOR BUILDING RECIRCULATION SYSTEM
SINGLE FAILURE ISSUES
PLA-4590**

FILE R41-2

Docket Nos. 50-387
and 50-388

Reference: 1) Letter from J. T. Wiggins (NRC) to R. G. Byram (PP&L), "NRC Inspection Report Nos. 50-387/388/96-03," April, 1996.

This letter is being written to advise the NRC of our disposition of Standby Gas Treatment System (SGTS) and Reactor Building Recirculation System (RBRS) single failure issues. We have concluded that the issues we have previously raised in LER 94-015 are beyond the Susquehanna SES licensing and design bases for these systems. The SGTS and RBRS, as currently configured, meet all design and licensing basis requirements. Based on this position we are requesting the withdrawal of LER 94-015. The NRC may find the information provided in this letter useful in resolving the unresolved items related to the SGTS and RBRS documented in Reference 1.

Basis for Disposition

We have researched our commitments and basis for the SGTS and RBRS and reached the following conclusion: the SGTS and RBRS, as currently designed, meet the requirements and the issues we previously raised are beyond our licensing and design basis. We have come to this conclusion by reviewing 10CRF50 Appendix A General Design Criterion 41 (GDC-41), Regulatory Guide 1.52 Revision 1, IEEE-279-1971, and FSAR Section 6.5.3.2.

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Regulations and Standards

Regulatory Guide 1.52, Design, Testing, and Maintenance Criteria for Engineering-Safety-Feature Atmosphere Cleanup System Air Filtration and Adsorption Units of Light-Water-Cooled Nuclear Power Plants, Revision 1 describes the requirements for the SGTS system. The Introduction states, "This guide presents methods acceptable to the NRC staff for implementing the Commission's regulations in Appendix A to 10 CFR Part 50 with regard to the design, testing, and maintenance criteria for air filtration and absorption units of engineered-safety-feature (ESF) atmosphere cleanup systems in light-water-cooled nuclear power plants." Hence, adherence to this Guide will satisfy the requirements of 10 CFR 50.

The Regulatory Guide invokes the single failure criteria in two areas, Paragraphs C.2.h and C.3.k. Paragraph C.2.h requires that all instrumentation and equipment controls should be designed to IEEE Standard 279-1971. Paragraph C.3.k requires that any cooling mechanism (for the absorber) should satisfy the single-failure criterion for providing low-humidity (less than 70% relative humidity) cooling air flow.

The cooling mechanism single failure requirements are not an issue. SGTS consists of two 100% capacity trains. Our previously identified issues questioned the applicability of IEEE Standard 279, Criteria for Protection Systems for Nuclear Power Generating Stations. This Standard describes the application of the single failure criteria to protection systems. In our deficiency identification process we applied the requirements of this Standard to the entire SGTS system resulting in EDR G00153, subsequent LER 94-0015 and CR 96-1215. The scope of this Standard is limited to all the electrical and mechanical devices and circuitry (from the sensors to actuation device input terminals) involved in generating those signals associated with the protective function. In our case this standard applies to the signals that initiate SGTS, not the SGTS system (the SGTS filter trains and ducts). Our analysis of the SGTS initiation signals has not disclosed any single failure that would prevent both SGTS trains from starting. Hence, IEEE Standard 279 is met for the Susquehanna SES design.

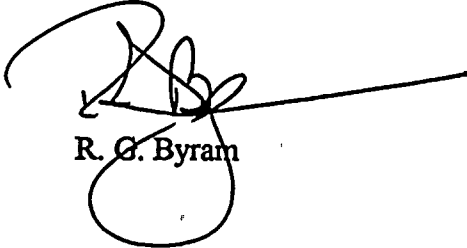
IEEE Standard 379-1972 supports this position, i.e. IEEE Standard 279 only applies to the initiating signal. Paragraph 6.6 of IEEE Standard 379-1972 states, "The actuated equipment is beyond the scope of IEEE Standard 279-1971 and this Guide."

Having met the IEEE 279-1971 requirements, the requirements of 10CFR50.55a(h) are also met.

The RBRS design is capable of meeting its functions as stated in FSAR Section 6.5.3.2. It contains two 100% redundant fans connected to the emergency power supply, associated ductwork, dampers, and controls. Both fans, ductwork used for the recirculation mode, supports, and instruments and controls meet the Seismic Category I requirements. As such, the RBRS design requirements are met.

PP&L believes SGTS and RBRS are consistent with design and licensing requirements. If you would like to further discuss this issue, please contact Mr. A. J. Roscioli at 610-774-4019.

Very truly yours,

A handwritten signature in black ink, appearing to be 'R. G. Byram', written over a horizontal line. The signature is stylized with a large loop at the end.

R. G. Byram

copy: NRC Region I

Mr. K. Jenison

NRC Sr. Resident Inspector - SSES

Mr. C. Poslusny, Jr.

NRC Sr. Project Manager - OWFN