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SUBJECT: Proposes changes to plant TS, clarifying current methodology for lab analysis of used C samples for SGTS & CR Emergency Outside Air Supply Sys (CREOASS).

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JUN 27 1997

U.S. Nuclear Regulatory Commission  
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**SUSQUEHANNA STEAM ELECTRIC STATION  
PROPOSED AMENDMENT NO. 207 TO LICENSE NPF-14  
AND PROPOSED AMENDMENT NO. 172 TO LICENSE NPF-22:  
CLARIFICATION OF USED CHARCOAL FILTER TESTING  
PLA-4641 FILE A17-2**

Docket Nos. 50-387  
and 50-388

- Reference: (1) PP&L Letter PLA-4640, "Request for Enforcement Discretion, Charcoal Filter Laboratory Testing," dated June 26, 1997.
- (2) Regulatory Guide 1.52, Revision 2, "Design, Testing and Maintenance Criteria for Post-Accident Engineered Safety Feature Atmosphere Cleanup System Air Filtration and Adsorption Units of Light Water Cooled Nuclear Power Plants," dated March 1978.
- (3) ANSI/ASME N509-1976, "Nuclear Power Plant Air Cleaning Units and Component."
- (4) RDT-M16-1T, "Gas-Phase Adsorbents for Trapping Radioactive Iodine and Iodine Compounds."
- (5) ASTM D-3803-1979, "Standard Test Methods for Radioiodine Testing of Nuclear Grade Gas-Phase Adsorbents."
- (6) ANSI/ASME N509-1980, "Nuclear Power Plant Air Cleaning Units and Component."
- (7) ASTM D-3803-1989, "Standard Test Methods for Radioiodine Testing of Nuclear Grade Gas-Phase Adsorbents."

The purpose of this letter is to propose changes to Susquehanna Steam Electric Station (SSES) Unit 1 and Unit 2 Technical Specifications, under exigent circumstances, to clarify the current methodology for laboratory analysis of used carbon samples for the Standby Gas Treatment System (SGTS) and the Control Room Emergency Outside Air Supply System (CREOASS).

This amendment request is submitted consistent with PP&L's verbal request for enforcement discretion on June 25, 1997 (Reference No. 1) and the follow-up written request submitted June 26, 1997. The NRC verbally granted the enforcement discretion on June 25, 1997 at 5:43 p.m. NRC approval of the subject proposed changes to Unit 1 and Unit 2 Technical Specifications will resolve the need for enforcement discretion by clarifying the subject surveillance requirements.

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### Background

SSES Technical Specifications contain limiting conditions for operation (LCO) for SGTS and CREOASS. The associated SSES surveillance requirements require that laboratory analysis of carbon samples meet the laboratory testing criteria of Regulatory Guide 1.52, Revision 2, March 1978 (Reference No. 2).

Regulatory position C.6.a.(3) of Regulatory Guide 1.52, Revision 2 requires that representative samples of used activated carbon pass the laboratory tests listed in Table 2 of the Guide. In Table 2, "Laboratory Tests for Activated Carbon," the applicable test for activated carbon bed depths of 4 inches or greater is test 5.b at a relative humidity of 70% for a methyl iodide penetration of less than 0.175%. A footnote for this test requirement directs the reader to Table 5-1 of ANSI N509-1976 (Reference No. 3).

Table 5-1 of ANSI N509-1976 is entitled "Summary Table of New Activated Carbon Physical Properties Batch Tests to Be Performed on Finished Adsorbents." Test 5.b (as referenced in Regulatory Guide 1.52, Revision 2) in this table refers to a radioiodine removal efficiency qualification test for new activated carbon using methyl iodide at 80°C and 95% relative humidity. The acceptable test method is RDT-M16-1T (Reference No. 4), paragraph 4.5.3, except at 80°C and 95% relative humidity with the pre- and post-loading sweep medium at 25°C.

PP&L determined that the vendor's testing at 30°C and 95% relative humidity in accordance with ASTM D-3803-1979 (Reference No. 5) was acceptable. However, PP&L did not identify the need to clarify the Technical Specification requirements to reflect the use of the ASTM D-3803-1979 standard in lieu of RDT-M16-1T, which was referenced as the "acceptable test method" in ANSI N509-1976, which in turn was referenced in Regulatory Guide 1.52, Revision 2.

In summary, the laboratory testing of activated carbon adsorbent for SSES is currently performed in accordance with ASTM D-3803-1979, which is identified in Table 5-1 of ANSI N509-1980 (Reference No. 6). However, the referenced Technical Specification requirements currently cite the testing criteria of Regulatory Guide 1.52, Revision 2, which references ANSI N509-1976/RDT-M16-1T.

PP&L identified this discrepancy during a review of the specification used to purchase new activated carbon. A Condition Report was generated on June 19, 1997. The initial operability determination was based upon the fact that the current test procedure is actually an improvement over the test methodology referenced in ANSI N509-1976/RDT-M16-1T. PP&L's current testing methodology was determined to be conservative, such that the SGTS and CREOASS can perform their design basis functions as intended

Basis for Amendment Request Under Exigent Circumstances

PP&L's request for a license amendment under exigent circumstances has primarily resulted from the recent discovery that a standard cited in Technical Specification surveillances (as a tertiary reference) was not used for laboratory analysis of activated carbon samples. Instead, PP&L relies upon a testing standard which is equivalent to or better than the tertiary reference in the Technical Specifications. Although PP&L views this as primarily an administrative issue, the Technical Specification compliance aspects remain a concern. In order to ensure that the testing methodology is clearly articulated in the Technical Specifications, the proposed change is necessary.

Technical Specifications currently reference Regulatory Guide 1.52, Revision 2 for criteria for the laboratory testing of activated carbon for the SGTS and CREOASS. This Regulatory Guide, which has not been revised since 1978, references ANSI N509-1976, which in turn references RDT-M16-1T as an acceptable testing methodology. However, PP&L's current methodology is based upon ASTM D-3803-1979. Although the current methodology represents an improvement over the methodology of ANSI N509-1976/RDT-M16-1T, PP&L does not use the specific testing methodology cited in the Technical Specifications.

SSES Units 1 and 2 are currently operating at 100% power. The need for prompt action is required because the failure to use the testing methodology referenced in Regulatory Guide 1.52, Revision 2 constitutes a noncompliance with the literal requirements of Technical Specifications.

PP&L's request for enforcement discretion was based upon the belief that it was more appropriate to rely on the existing testing, based upon the equivalent to or better than testing methodology. This also forms the basis for this exigent request.

Supporting Information

Attachment 1 presents the safety assessment for the change request. This assessment concludes that the proposed changes to SSES Unit 1 and Unit 2 Technical Specifications will eliminate the inconsistency between the test methodology cited in a tertiary reference (RDT-M16-1T) of the Technical Specifications and the current testing methodology. This conclusion is based upon a comparison of the testing methodologies.

Attachment 2 evaluates No Significant Hazards Considerations and Environmental Considerations. This evaluation concludes that the proposed Technical Specification change action does not involve a significant increase in the probability or consequences of an accident previously evaluated; does not create the possibility of a new or different kind of accident from any accident previously evaluated; and does not involve a significant reduction in the margin of safety. Furthermore, the change conforms to the criteria for actions eligible for categorical exclusion as specified in 10 CFR 51.22(c)(9), and will not impact the environment.


Attachment 3 contains marked-up pages from the Unit 1 and Unit 2 Technical Specifications to illustrate the proposed changes, which are described in Attachment 1.

The proposed changes have been approved by the SSES Plant Operations Review Committee and reviewed by the Susquehanna Review Committee.

Based upon discussions with the NRC at a teleconference on June 25, 1997, PP&L understands that the 1989 version of the ASTM D-3803 standard (Reference No. 7) is currently viewed as the preferred testing methodology. As indicated in Reference No. 1, PP&L will evaluate the 1989 version of the ASTM-D-3803 standard for possible implementation. If the evaluation determines that the 1989 standard should be incorporated, PP&L will submit a Technical Specification amendment request to the NRC for review.

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

Very truly yours,



G. T. Jones

Attachments

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



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