CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9709220053 DOC.DATE: 97/09/12 NOTARIZED: NO DOCKET #
FACIL:50-387 Susquehanna Steam Electric Station, Unit 1, Pennsylva 05000387
AUTH.NAME AUTHOR AFFILIATION
JONES,G.T. Pennsylvania Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Supplements 970911 ltr re request for enforcement discetion on inoperable acoustic monitor.Markup of proposed TS change, encl.

DISTRIBUTION CODE: A001D COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 3+2
TITLE: OR Submittal: General Distribution

NOTES: 05000387

	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL
	PD1-2 LA	1	1	PD1-2 PD	1	1
	POSLUSNY,C	1	1			
INTERNAL:	ACRS	1	1	FILE CENTER 01	1	1
	NRR/DE/ECGB/A	1	1	NRR/DE/EMCB	1	1
	NRR/DRCH/HICB	1	1	NRR/DSSA/SPLB	1	1
	NRR/DSSA/SRXB	1	1	NUDOCS-ABSTRACT	1	1
	OGC/HDS2	1	0			
EXTERNAL:	NOAC	1	1	NRC PDR	1	1
NOTES:		1	1			

CATEGORY 1 DOCUMENT

NOTE TO ALL "RIDS" RECIPIENTS:
PLEASE HELP US TO REDUCE WASTE. TO HAVE YOUR NAME OR ORGANIZATION REMOVED FROM DISTRIBUTION LISTS OR REDUCE THE NUMBER OF COPIES RECEIVED BY YOU OR YOUR ORGANIZATION, CONTACT THE DOCUMENT CONTROL DESK (DCD) ON EXTENSION 415-2083

TOTAL NUMBER OF COPIES REQUIRED: LTTR 15 ENCL 14

PP&L Pennsylvania Power & Light Company
Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

George T. Jones
Vice President - Nuclear Operations
610/774-7602
Fax: 610/774-7797

SEP 12 1997

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

SUSQUEHANNA STEAM ELECTRIC STATION
SUPPLEMENT TO REQUEST FOR ENFORCEMENT
DISCRETION ON INOPERABLE ACOUSTIC MONITOR
PLA-4670 **FILES A17-2/R41-2** **Docket No. 50-387**

Reference: *PLA-4669, R. G. Byram to US NRC, "Request for Enforcement Discretion: Inoperable Acoustic Monitor," dated September 11, 1997.*

The purpose of this letter is to supplement the referenced letter in response to NRC questions developed during your review. Each item and PP&L's response follows:

1. Provide a markup of a proposed Technical Specification change.

Response: A markup is attached. Specifications 3.3.7.5 and 3.4.2 are proposed to be conditioned with the following footnote: "Compliance with these requirements for the "S" SRV acoustic monitor is not required for the period beginning September 12, 1997, until the next unit shutdown of sufficient duration to allow for containment entry, not to exceed the 10th refueling and inspection outage." The formal amendment request is planned to be submitted on September 15, 1997.

PP&L currently plans to submit a follow-up amendment request on both units that would, in accordance with the provisions of the Improved Technical Specifications, relocate the requirements associated with the acoustic monitors to our Technical Requirements Manual. Our current schedule for this submittal is September 30, 1997. We will keep the NRC informed of our progress on this effort.

2. Provide an evaluation of root cause of the event, and any relevant historical information.

Response: As stated in the referenced letter, PP&L has established that the failure of the "S" acoustic monitor is associated with components located within the containment, and are therefore inaccessible. This conclusion is based on our diagnostic investigation in addition to discussions with the equipment vendor. As such, a definitive root cause cannot be established at this time.

9709220053 970912
PDR ADOCK 05000387
P PDR

190069

In January 1994, PP&L requested and received an enforcement discretion due to a failure of an Acoustic Monitor on Unit 2. Since that time there has been other events, which Acoustic Monitors have failed (October 1995 (Unit 2) & October 1996 (Unit 1)). In all of these events, the monitors either failed to respond or failed high indicating an open MSRV which resulted in a condition that would not clear or reset automatically. The causes of these events have been due to failed accelerometer cable connectors and/ or charge convertors.

This recent event on Unit 1, is different than the previous events. This event resulted in a monitor that was erratic and would frequently produce erroneous open MSRV alarms. The alarm condition would clear automatically.

In all the above cases, it was determined that there were no MSRV's that opened. Since the first event in 1994, we have improved our maintenance practices, installed improved accelerometer cable connectors and procedurally control that during an outage with Drywell access, work in the Drywell must be completed prior to functionally checking the Acoustic Monitors, prior to Drywell closet.

3. Provide a statement as to whether or not implementation of the Improved Standard Technical Specifications (ISTS) would have obviated the need for this request for enforcement discretion.

Response: PP&L submitted an application for the ISTS on August 1, 1996. It is currently under NRC review. The ISTS would relocate the subject Tech Spec requirements to PP&L's Technical Requirements Manual, under which changes can be controlled pursuant to 10CFR50.59.

The question as to whether or not the ISTS would have obviated the need for enforcement discretion is a function of whether or not a 10CFR50.59 safety evaluation would have determined that PP&L could have altered the current shutdown action requirements without requiring NRC prior review and approval. Such an evaluation has not been performed to date.

4. Provide a qualitative risk assessment of operation without the inoperable acoustic monitor.

Response: As stated in the reference, the "S" SRV is operable and closed based on alternate indications. The associated acoustic monitor is inoperable. This has no impact on the probability of SRV malfunction. It is the primary means of detecting SRV position, and as such the risk to be considered is the operator's ability to quickly detect a stuck open SRV. PP&L does not believe that this represents a significant degradation in risk based on the following items which are described in the reference:

- The proceduralized alternate indications that exist; a number of these indications (eg., suppression pool temperature , and reactor vessel level and pressure) would provide prompt indication consistent with the expectations in Tech Spec 3.4.2;
- Existing operator training on the indications; and
- Compensatory actions to focus the operator to the alternate indications for the "S" acoustic monitor, including procedure changes and training.

This submittal has been reviewed and approved by the Plant Operations Review Committee. Please contact us if you have further questions.

Very truly yours,

G. T. Jones

Attachment

copy: NRC Region I
Mr. K. Jenison, NRC Sr. Resident Inspector - SSES
Mr. C. Poslusny, NRC Sr. Project Manager - Rockville
Mr. W. P. Dornsife, PA DER/BRP