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BYRAM, R.G.      Pennsylvania Power & Light Co.  
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SUBJECT: Submits upgrade of proposed amend 212 to License NPF-14 re inoperable acoustic monitor to emergency status.

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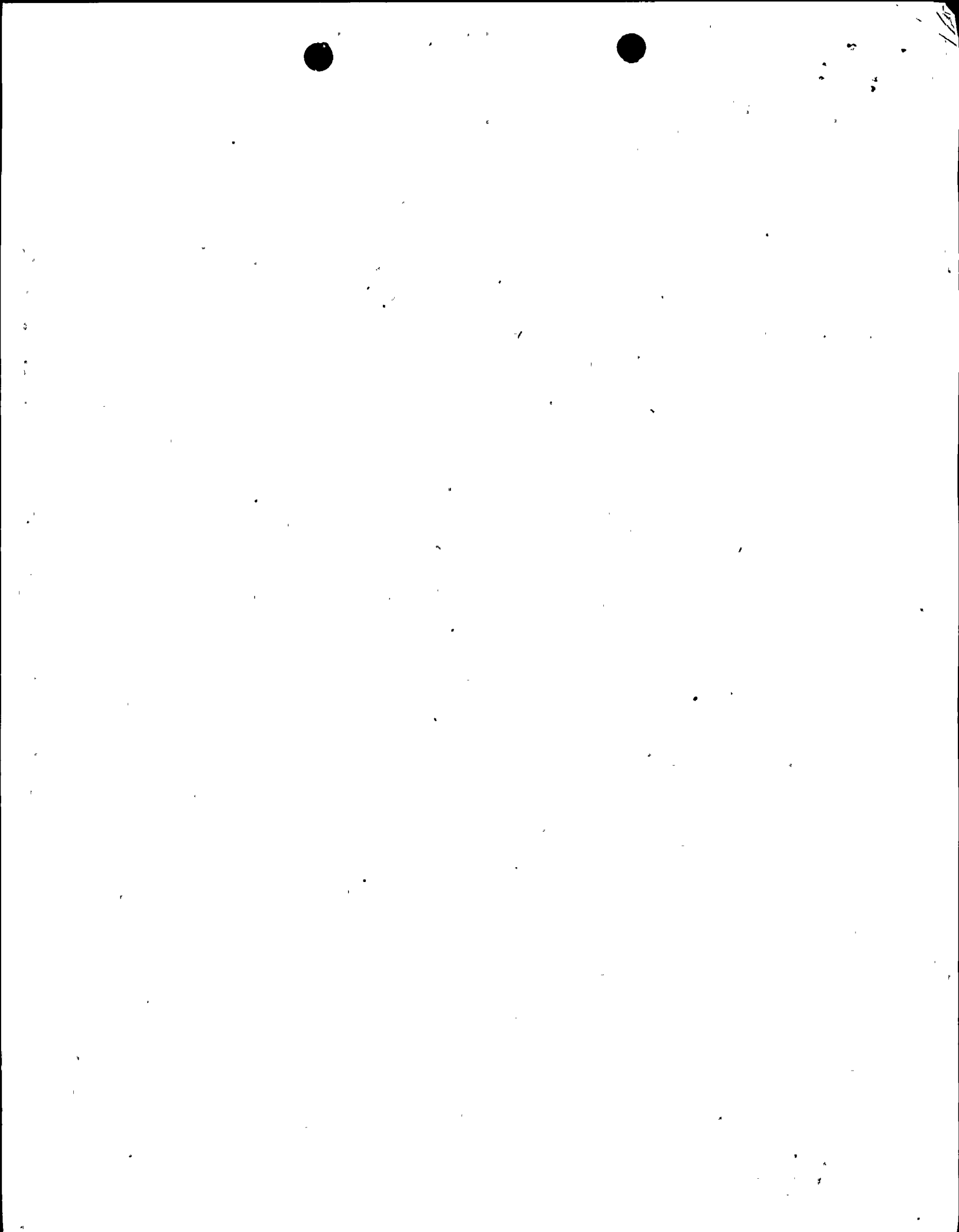
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**Pennsylvania Power & Light Company**

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SEP 16 1997

U.S. Nuclear Regulatory Commission  
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**SUSQUEHANNA STEAM ELECTRIC STATION  
UPGRADE OF PROPOSED AMENDMENT NO. 212 TO  
LICENSE NPF-14 (INOPERABLE ACOUSTIC MONITOR)  
TO EMERGENCY STATUS**

PLA-4674

FILE A17-2

Docket Nos. 50-387

*Reference: PLA-4672, G. T. Jones to US NRC, "Proposed Amendment No. 212 to License NPF-14: Inoperable Acoustic Monitor," dated September 15, 1997.*

The purpose of this letter is to upgrade the referenced proposed license amendment to exigent status in accordance with the provisions of 10CFR50.91. All of the information submitted in the reference remains valid, including the No Significant Hazards Considerations. Our basis for requesting NRC review of this proposal in an exigent manner is as follows.

**BASIS FOR EMERGENCY AMENDMENT REQUEST AND WHY IT COULD NOT HAVE BEEN AVOIDED**

10CFR50.91 provides guidance on what information the NRC requires in support of an application for an emergency change.

First it must be established that an emergency exists, "in that failure to act in a timely manner would result in derating or shutdown of a nuclear power plant, or in prevention of either resumption of operation or of increase in power output up to the plant's licensed power level."

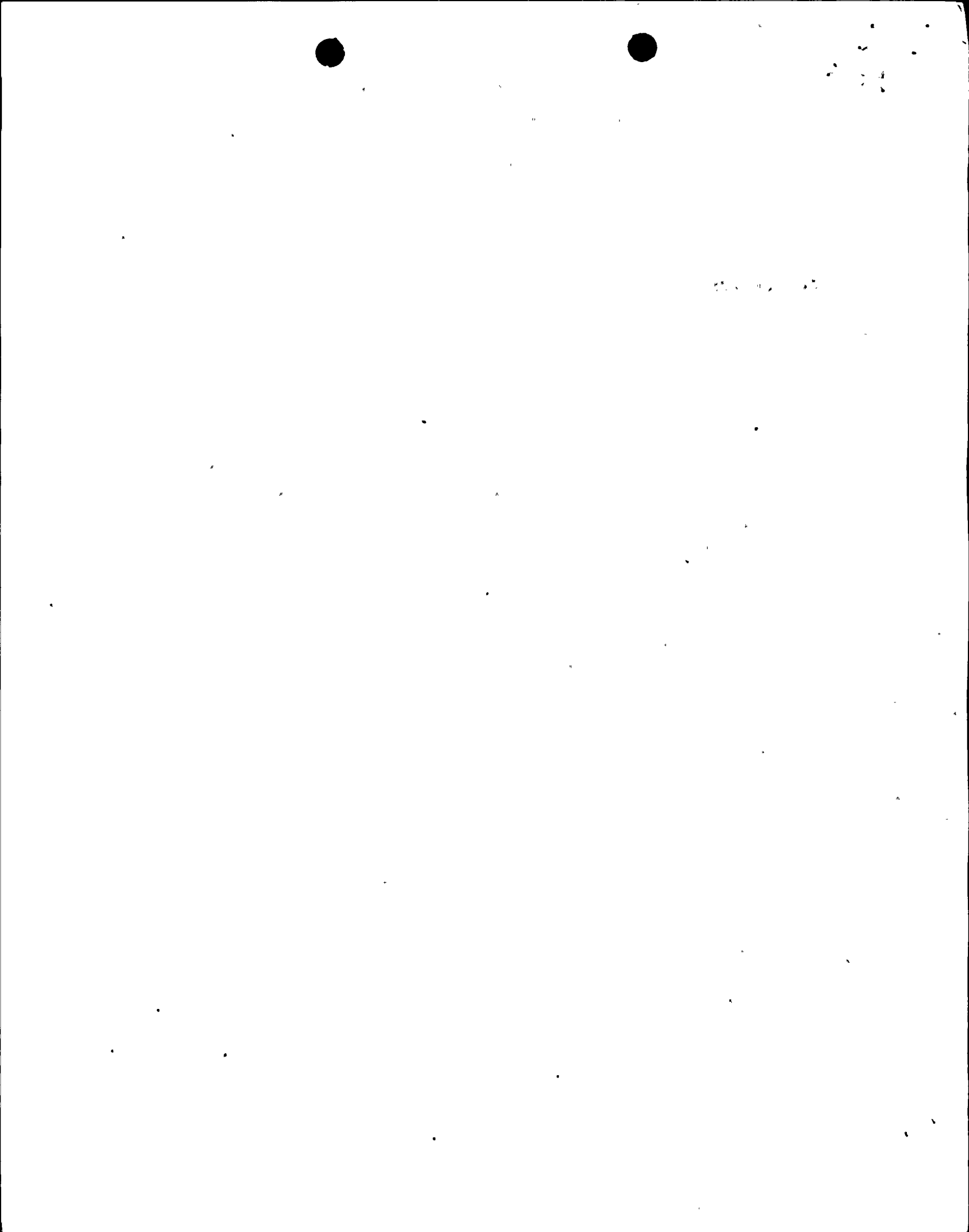
An inoperable acoustic monitor for a single safety relief valve was identified on September 10, 1997. Technical Specifications required repair of the monitor or subsequent shutdown of the unit. The acoustic monitor was determined to require a containment entry to repair.

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A request for enforcement discretion to continue operation was prepared and submitted on September 11, 1997. On September 12, 1997, a supplemental submittal was provided, and the NRC granted the enforcement discretion verbally. Susquehanna SES Unit 1 continues to operate on this basis. Timely action is required consistent with the enforcement discretion process to ensure that the Technical Specifications properly characterize the interim requirements for the acoustic monitor in question. Failure to provide these changes coupled with expiration of the enforcement discretion would result in subsequent shutdown of the unit.

Secondly, 10CFR50.91 require the license to "... explain why this emergency situation occurred and why it could not avoid this situation ...".

As stated above, Susquehanna SES Unit 2 experienced an unanticipated component failure that resulted in entry into a shutdown action statement in accordance with the Technical Specifications. These circumstances were clearly not able to be anticipated, and therefore this request was not avoidable. Further, based on the time necessary to evaluate this problem, interact on enforcement discretion, and to prepare and review the referenced proposal internally, PP&L believes that this application has been submitted in a timely fashion.

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

Very truly yours,



R. G. Byram

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



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BEFORE THE  
UNITED STATES NUCLEAR REGULATORY COMMISSION

\_\_\_\_\_  
In the Matter of : Docket No. 50-387  
PENNSYLVANIA POWER & :  
LIGHT COMPANY :

\_\_\_\_\_  
PROPOSED AMENDMENT NO. 212  
FACILITY OPERATING LICENSE NO. NPF-14  
SUSQUEHANNA STEAM ELECTRIC STATION  
UNIT NO. 1  
\_\_\_\_\_

Licensee, Pennsylvania Power & Light Company, hereby files upgrade of proposed Amendment No. 212 to its Facility Operating License No. NPF-14 dated July 17, 1982.

This amendment contains a revision to the Susquehanna SES Unit 1 Technical Specifications.

PENNSYLVANIA POWER & LIGHT COMPANY  
BY:

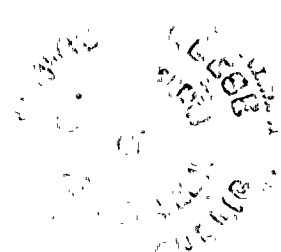


\_\_\_\_\_  
R. G. Byram  
Sr. Vice President - Generation and Chief Nuclear Officer

Sworn to and subscribed before me  
this 16<sup>th</sup> day of *September*, 1997.

*Janice M. Reese*  
\_\_\_\_\_  
Notary Public

NOTARIAL SEAL  
JANICE M. REESE, Notary Public  
City of Allentown, Lehigh County, PA  
My Commission Expires June 11, 2001



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