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 BYRAM, R.G.      Pennsylvania Power & Light Co. *Rel Report Proposed Changes to TS*  
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SUBJECT: Requests for accelerated review of improved Tech Spec re relocation of SRV acoustic monitors.

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U.S. Nuclear Regulatory Commission  
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**SUSQUEHANNA STEAM ELECTRIC STATION  
REQUEST FOR ACCELERATED REVIEW OF  
IMPROVED TECHNICAL SPECIFICATION  
RELOCATION OF SRV ACOUSTIC MONITORS  
PLA-4684 FILES A17-2/R41-2**

Docket Nos. 50-387  
and 50-388

- References: 1 Letter, C. Poslusny to R. G. Byram, "Emergency Technical Specifications Changes Addressing the Inoperable Acoustic Monitor, Susquehanna Steam Electric Station, Unit 1 (TAC No. M99615)," dated September 23, 1997.
2. PLA-4670, R. G. Byram to US NRC, "Supplement to Request for Enforcement Discretion on Inoperable Acoustic Monitor," dated September 12, 1997.
3. PLA-4488, R. G. Byram to US NRC, "Proposed Amendment No. 203 to License NPF-14 and No. 161 to License NPF-22: Conversion of the SSES Technical Specifications to the Improved Standard Technical Specifications, NUREG 1433," dated August 1, 1996.

The purpose of this letter is to propose an accelerated review of a portion of a previously submitted change to the Susquehanna SES Unit 1 and Unit 2 Technical Specifications.

## Background

Recently, PP&L requested and received enforcement discretion due to an inoperable safety relief valve (SRV) acoustic monitor on Susquehanna SES Unit 1. As part of that interaction, the NRC approved an amendment that formally transfers the provisions of the enforcement discretion to the Technical Specifications (Reference 1). As part of our request for enforcement discretion, PP&L also committed (Reference 2) 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."

The purpose of this commitment was to mitigate the need for future potential enforcement discretion due to inoperable acoustic monitors, based upon the generic position taken in NUREG-1433 that relocating these monitors is appropriate. We do not currently have additional acoustic monitor problems.

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### Description of Proposed Changes

Accordingly, PP&L hereby proposes that the NRC accelerate their review of those portions of our Improved Technical Specification (ITS) amendment (Reference 3) that support relocation of the SRV acoustic monitors from the Technical Specifications to the Technical Requirements Manual.

The following documents are attached that describe the proposed changes to Specifications 3/4.3.7.5 and 3/4.4.2:

- Marked-up pages from the current Unit 1 and Unit 2 Technical Specifications
- Relevant pages from the proposed amendment adopting the Improved Technical Specifications (Reference 3), including the CTS Markup "Roadmap", Discussion of Changes, and No Significant Hazards Evaluations.

PP&L is currently processing changes to the TRM which will reflect relocation of the current SRV acoustic monitor requirements in TRM format (i.e., like the ITS). Upon internal approval of the revised TRM pages, PP&L will forward them to the NRC under separate cover.

### Basis for Change

*(Note: The following is summarized from PP&L's proposed amendment adopting the Improved Technical Specifications [Reference 3] and is repeated here for ease of reference. The actual wording from Ref. 3 is provided in the Discussion of Change excerpts in the Attachments to this letter.)*

#### Specification 3/4.3.7.5, Post Accident Monitoring

The NRC position on application of the deterministic screening criteria to post-accident monitoring instrumentation is documented in a letter dated May 7, 1988 from NRC to the BWR Owners' Group. The NRC took the position that the post-accident monitoring instrumentation table list should contain, on a plant specific basis, all Type A and Category 1 instruments specified in the plant's Safety Evaluation Report on Regulatory Guide 1.97. The instruments which do not meet this criteria may be relocated to licensee-controlled documents.

Based on an NRC letter dated February 6, 1985 that documented PP&L's conformance to Regulatory Guide 1.97 Rev. 2, the SRV acoustic monitors fit this latter category. They are therefore proposed to be relocated to the TRM.

The following changes were reviewed in the ITS submittal:

- Administrative Change A.7 - A Unit 2 footnote specifying that the "S" acoustic monitor is not required until the next refueling outage after January 21, 1994 has been eliminated because it was a one time exemption that has expired. This administrative change has no impact on safety since the allowance is no longer applicable.
- Relocated Specification R.10 - Item 9 in Tables 3.3.7.3-1 and 4.3.7.5-1, Safety/Relief Valve Position Indicators, do not satisfy the NRC Technical Specification Policy Statement Screening Criteria, since they are not classified as Type A or Category 1 instruments in Regulatory Guide 1.97, Rev. 2, as discussed above.

Specification 3/4.4.2, Safety/Relief Valves

This specification requires the SRV acoustic monitors to be operable. The SRV acoustic monitors provide a monitoring function only, to detect an open SRV, and do not impact SRV operability. The Technical Specifications will continue to require SRV operability, but the acoustic monitor requirements will be relocated to the TRM.

The level of safety of facility operation is unaffected by the change because there is no change in the requirement to maintain the SRVs operable.

The following changes were reviewed in the ITS submittal:

- Administrative Change A.2 - A Unit 2 footnote specifying that the "S" acoustic monitor is not required until the next refueling outage after January 21, 1994 has been eliminated because it was a one time exemption that has expired. This administrative change has no impact on safety since the allowance is no longer applicable.
- More Restrictive Technical Change M.1 - A new surveillance requirement is added to verify the lift setpoints of the SRVs in accordance with the Inservice Testing Program. This verification is currently being performed, but is not in the Technical Specifications, and is therefore considered an additional restriction on plant operations. It is required to ensure the operability of the SRVs, and therefore supports the plant safety analysis.
- Less Restrictive Technical Change LA.2 - The requirements associated with the acoustic monitors in this specification are proposed to be relocated to the TRM, where they will be adequately defined and controlled. This is acceptable because the acoustic monitors provide a monitoring function only, and are not required to support SRV operability. The level of safety of facility operation is unaffected because the change does not impact SRV operability.



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## No Significant Hazards Considerations

*(Note: The following "No Significant Hazards Considerations" is summarized from PP&L's proposed amendment adopting the Improved Technical Specifications, Reference 3, and is repeated here for clarity. The actual wording from Ref. 3 is provided in the Attachments to this letter.)*

1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

### Specification 3/4.3.7.5

- Administrative Change A.7 - The proposed change involves no technical changes to the current Technical Specifications. The change is administrative in nature because it does not affect the initiators of analyzed events and does not affect any assumptions associated with the mitigation of accident or transient events. Therefore, the change does not involve any increase in the probability or consequences of any accident previously evaluated.
- Relocated Specification R.10 - The proposed change relocates requirements for surveillances structures, systems, components or variables that do not meet any of the four criteria in the NRC Policy Statement used for defining the scope of Technical Specifications. These relocated requirements are not deleted or changed. Therefore, these changes will not result in any changes to the requirements specified in the SSES CTS, but will reduce the level of regulatory control on the identified requirements. The level of regulatory control has no impact on the probability or the consequences of an accident previously evaluated, therefore, these changes have no impact on the probability of an accident previously evaluated.

### Specification 3/4.4.2

- Administrative Change A.2 - The proposed change involves no technical changes to the current Technical Specifications. The change is administrative in nature because it does not affect the initiators of analyzed events and does not affect any assumptions associated with the mitigation of accident or transient events. Therefore, the change does not involve any increase in the probability or consequences of any accident previously evaluated.
- More Restrictive Technical Change M.1 - The proposed change provides requirements determined to be more conservative than the existing requirements for operation of the facility. Therefore, the change establishes adequate assurance that components are operable when necessary for the prevention or mitigation of accidents or transients and that plant variables are maintained within limits necessary to satisfy the assumptions for initial

conditions in the safety analysis. Therefore, the changes does not involve any increase in the probability or consequences of an accident previously evaluated.

- Less Restrictive Technical Change LA.2 - The proposed change removes from the SSES Technical Specifications items that are informational or implementing details that are adequately and more appropriately controlled by the licensee. These requirements being moved to another controlled document or removed from Technical specifications are not deleted or changed. Therefore, these changes will not result in any changes to the requirements specified in the SSES CTS, but will reduce the level of regulatory control on the identified requirements. The level of regulatory control has no impact on the probability or the consequences of an accident previously evaluated, therefore these changes have no impact on the probability or consequences of an accident previously evaluated.
2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

Specification 3/4.3.7.5

- Administrative Change A.7 - The proposed changes will not involve any physical changes to plant systems, structures, or components (SSC), or the manner in which these SSC are operated, maintained, modified, tested, or inspected. The proposed changes will not impose or eliminate any requirements. Therefore, these change do not create the possibility of a new or different kind of accident from any accident previously evaluated.
- Relocated Specification R.10 - The proposed changes will not involve any physical changes to plant systems, structures, or components (SSC), or the manner in which these SSC are operated, maintained, modified, tested, or inspected. The proposed changes will not impose or eliminate any requirements. Therefore, these change do not create the possibility of a new or different kind of accident from any accident previously evaluated.

Specification 3/4.4.2

- Administrative Change A.2 - The proposed changes will not involve any physical changes to plant systems, structures, or components (SSC), or the manner in which these SSC are operated, maintained, modified, tested, or inspected. The proposed changes will not impose or eliminate any requirements. Therefore, these change do not create the possibility of a new or different kind of accident from any accident previously evaluated.





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- More Restrictive Technical Change M.1 - The proposed change will not involve any physical changes to plant systems, structures, or components, and are consistent with the current safety analysis assumptions. Therefore, the change will not create the possibility of a new or different kind of accident from any accident previously evaluated.
  - Less Restrictive Technical Change LA.2 - The proposed changes will not involve any physical changes to plant systems, structures, or components (SSC), or the manner in which these SSC are operated, maintained, modified, tested, or inspected. The proposed changes will not impose or eliminate any requirements. Therefore, these change do not create the possibility of a new or different kind of accident from any accident previously evaluated.
3. Does this change involve a significant reduction in a margin of safety?

Specification 3/4.3.7.5

- Administrative Change A.7 - The proposed change will not reduce a margin of safety because it is administrative and has no impact on any safety analysis assumptions.
- Relocated Specification R.10 - The margin of safety as defined in the bases of any Technical Specification is not reduced. The requirements being moved to another controlled document or removed from Technical Specifications remain the same as stated in the existing Technical Specifications. Therefore, no reduction in a margin of safety will be permitted. Removal of these items from Technical Specification eliminates the requirement for NRC review and approval of revisions to the Technical Specifications in accordance with 10 CFR 50.92. Elimination of this administrative process does not have a margin of safety that can be evaluated. However, the proposed changes are consistent with the BWR Standard Technical specification, NUREG-1433, Rev. 1, which was approved by the NRC. Revising the Technical Specifications to reflect the approved level of detail ensures no significant reduction in the margin of safety.

Specification 3/4.4.2

- Administrative Change A.2 - The proposed change will not reduce a margin of safety because it is administrative and has no impact on any safety analysis assumptions.
- More Restrictive Technical Change M.1 - The imposition of more restrictive requirements is designed to enhance plant safety. The change maintains requirements within the plant safety analyses and licensing basis. Therefore, the change does not involve a reduction in a margin of safety.

- Less Restrictive Technical Change LA.2 - The margin of safety as defined in the bases of any Technical Specification is not reduced. The requirements being moved to another controlled document or removed from Technical Specifications remain the same as stated in the existing Technical Specifications. Therefore, no reduction in a margin of safety will be permitted. Removal of these items from Technical Specification eliminates the requirement for NRC review and approval of revisions to the Technical Specifications in accordance with 10 CFR 50.92. Elimination of this administrative process does not have a margin of safety that can be evaluated. However, the proposed changes are consistent with the BWR Standard Technical specification, NUREG-1433, Rev. 1, which was approved by the NRC. Revising the Technical Specifications to reflect the approved level of detail ensures no significant reduction in the margin of safety.

### **Environmental Considerations**

As stated in Reference 3: "...the proposed changes do not create a potential for a significant change in the types or a significant increase in the amount of any effluent that may be released off-site, nor do the changes involve a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the changes meet the eligibility criteria for a categorical exclusion as set forth in 10 CFR 51.22(c)(9). Therefore in accordance with 10 CFR 51.22(b), an environmental assessment of the changes is not required.

### **Implementation**

Upon relocation to the Technical Requirements Manual (TRM), PP&L will perform a 10CFR50.59 evaluation to determine if further NRC review is required in support of eliminating the current shutdown requirements associated with these instruments. If such a review is required, it will be requested prior to implementation of less restrictive requirements in the TRM.

It is requested that the NRC condition their approval of this request to be effective 30 days after approval. Any questions on this request should be directed to Mr. J. M. Kenny at (610) 774-7535.

Very truly yours,



R. G. Byram

Attachments



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

