

BEFORE THE  
UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of

:

Docket No. 50-388

PP&L, INC.

:

PROPOSED AMENDMENT NO. 179  
FACILITY OPERATING LICENSE NO. NPF-22  
SUSQUEHANNA STEAM ELECTRIC STATION  
UNIT NO. 2

Licensee, PP&L, Inc., hereby files proposed Amendment No. 179 to its Facility Operating License No. NPF-22 dated March 23, 1984.

This amendment contains a revision to the Susquehanna SES Unit 2 Technical Specifications.

PP&L, INC.

BY:



R. G. Byram

Sr. Vice President - Generation and Chief Nuclear Officer

Sworn to and subscribed before me  
this 26<sup>th</sup> day of January, 1998.

*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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BEFORE THE  
UNITED STATES NUCLEAR REGULATORY COMMISSION

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In the Matter of :  
PP&L, INC. : Docket No. 50-387

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PROPOSED AMENDMENT NO. 217  
FACILITY OPERATING LICENSE NO. NPF-14  
SUSQUEHANNA STEAM ELECTRIC STATION  
UNIT NO. 1

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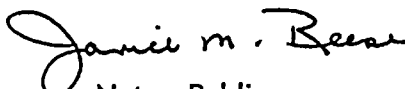
Licensee, PP&L, Inc., hereby files proposed Amendment No. 217 to its Facility Operating License No. NPF-14 dated July 17, 1982.

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

PP&L, INC.  
BY:

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

Sworn to and subscribed before me  
this 26<sup>th</sup> day of January, 1998.

  
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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## SAFETY ASSESSMENT

### PROPOSED LICENSE AMENDMENT FACILITY STAFF QUALIFICATIONS

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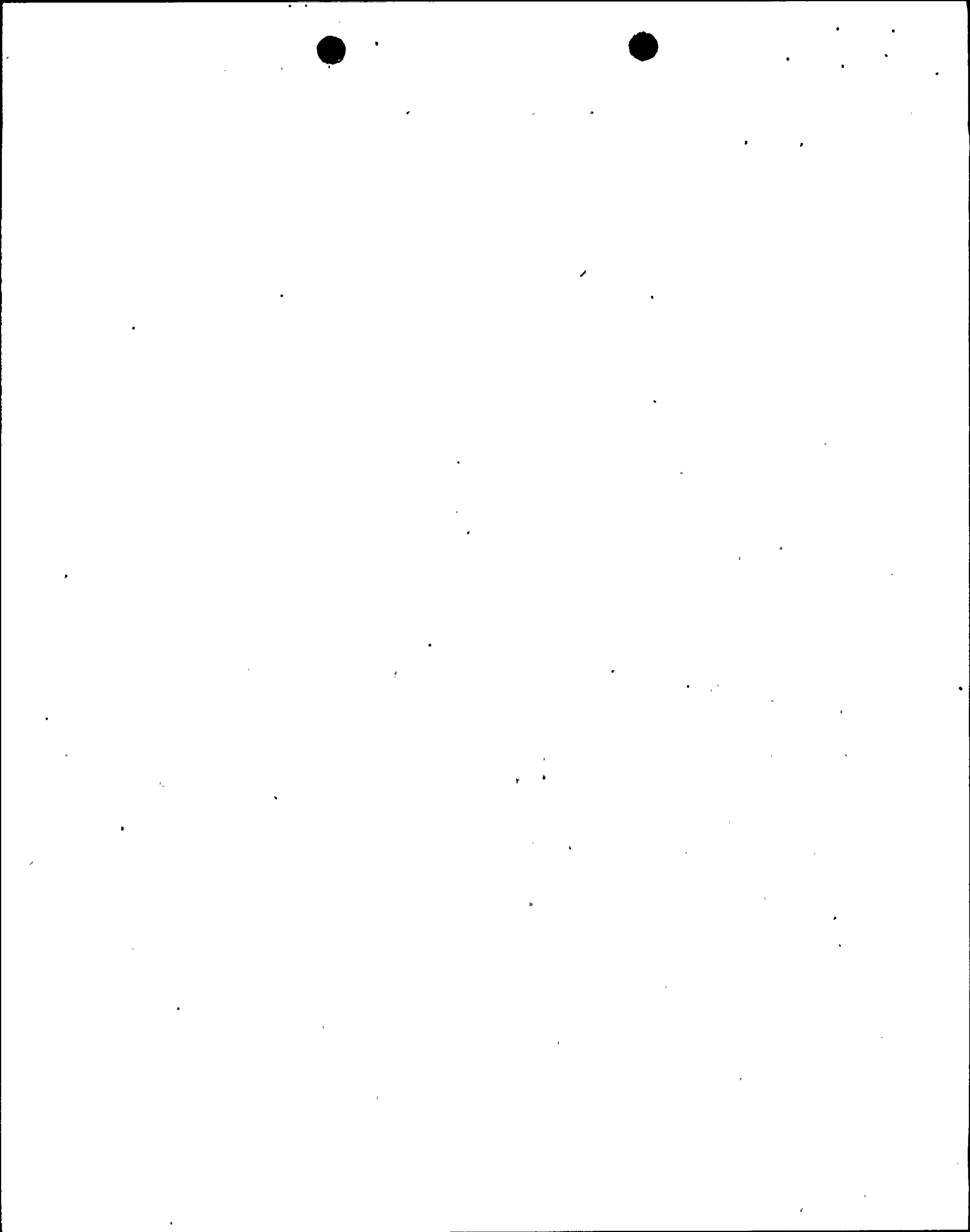
#### BACKGROUND

The purpose of these proposed changes to the Susquehanna SES Technical Specifications is to change the facility staff requirements to allow an individual who does not hold a current senior reactor operator (SRO) license to hold the position of Manager-Nuclear Operations and require an individual serving in the capacity of the Operations Supervisor-Nuclear to hold a current SRO license. The Operations Supervisor-Nuclear reports directly to the Manager-Nuclear Operations.

Historically, the position of Manager-Nuclear Operations at Susquehanna SES was required by Technical Specifications 6.2.2g and 6.3.1 to hold a SRO license. This requirement was derived from ANSI N18.1 - 1971, Section 4.2.2 which reads: "At the time of initial core loading or appointment to the active position, the *"Operations Manager"* shall have a minimum of eight years of responsible power plant experience of which a minimum of three years shall be nuclear power experience. A maximum of two years of the remaining five years of power plant experience may be fulfilled by satisfactory completion of academic or related technical training on a one-for-one time basis. At the time of initial core loading or appointment to the active position the *"Operations Manager"* shall hold a Senior Reactor Operators license." The chain of command for the on-site organization responsible at Susquehanna SES has maintained a position organizationally between the Manager of Operations and the duty Shift Supervisor. This position (Day Shift Supervisor) was filled by a Shift Supervisor holding a SRO license assigned to day shift.

A recent change to the operations organization established the position of Operations Supervisor-Nuclear. This position replaced the position of Day Shift Supervisor. The Operations Supervisor-Nuclear reports directly to the Manager-Nuclear Operations. Reporting directly to the Operations Supervisor-Nuclear are the duty Shift Supervisor and crews, Shift Technical Advisors, and support staff personnel. The individual holding the position of Operations Supervisor-Nuclear is required to hold a current SRO license.

As noted above, ANSI N18.1-1971 established that the *"Operations Manager"* hold a SRO license. The requirement applied to organizations where the duty Shift Supervisors reported directly to the *"Operations Manager"* with the intent that the person in the chain of command directly above the duty Shift Supervisors hold a SRO license. The Susquehanna SES operations organization change establishes the Operations Supervisor-Nuclear as the person meeting the requirements established by ANSI 18.1-1971, Section 4.2.2, *"Operations Manager."* This change also retains the commitment to have a member of the unit staff not assigned to shift duties who holds a SRO license. With this change, where the Manager-Nuclear Operations will not necessarily hold a current SRO license, the position of Manager-Nuclear Operations



correlates to Section 4.2.1 of ANSI N18.1, "*Plant Managers*." ANSI N18.1-1971 does not require that a SRO License be held for "*Plant Managers*." These individuals are primarily required to have acquired the experience and training normally required for examination for a SRO License. Consequently, the requirements for holding the position of Manager-Nuclear Operations will be redefined as follows:

"The Manager-Nuclear Operations shall meet one of the following:

1. Hold a senior reactor operator license, or
2. Have held a senior reactor operator license for Susquehanna SES or a similar unit (BWR), or
3. Have been certified to have equivalent senior operator knowledge."

#### CHANGE DESCRIPTION

The proposed changes to the Susquehanna Steam Electric Station Units 1 and 2 Technical Specifications 6.2.2g and 6.3.1 permit an individual who does not hold a current SRO license to hold the position of Manager-Nuclear Operations, and require an individual serving in the capacity of the Operations Supervisor-Nuclear to hold a current SRO license. The Operations Supervisor-Nuclear reports directly to the Manager-Nuclear Operations. Reporting directly to the Operations Supervisor-Nuclear are the duty Shift Supervisor and crews, Shift Technical Advisors, and support staff personnel. The Operations Supervisor-Nuclear is the person who will meet all the requirements established by ANSI N18.1-1971, thereby, retaining the commitment to have a member of the unit staff not assigned to shift duties who holds a SRO license. With this change, where the Manager-Nuclear Operations will not necessarily hold a current SRO license, the position correlates to Section 4.2.1 of ANSI N18.1, "*Plant Managers*". ANSI N18.1-1971 does not require that a SRO license be held for "*Plant Managers*". These individuals are primarily required to have acquired the experience and training normally required for examination for a SRO license. Consequently, the requirements for holding the position of Manager-Nuclear Operations will be redefined as follows:

"The Manager-Nuclear Operations shall meet one of the following:

1. Hold a senior reactor operator license, or
2. Have held a senior reactor operator license for Susquehanna SES or a similar unit (BWR), or
3. Have been certified to have equivalent senior operator knowledge."

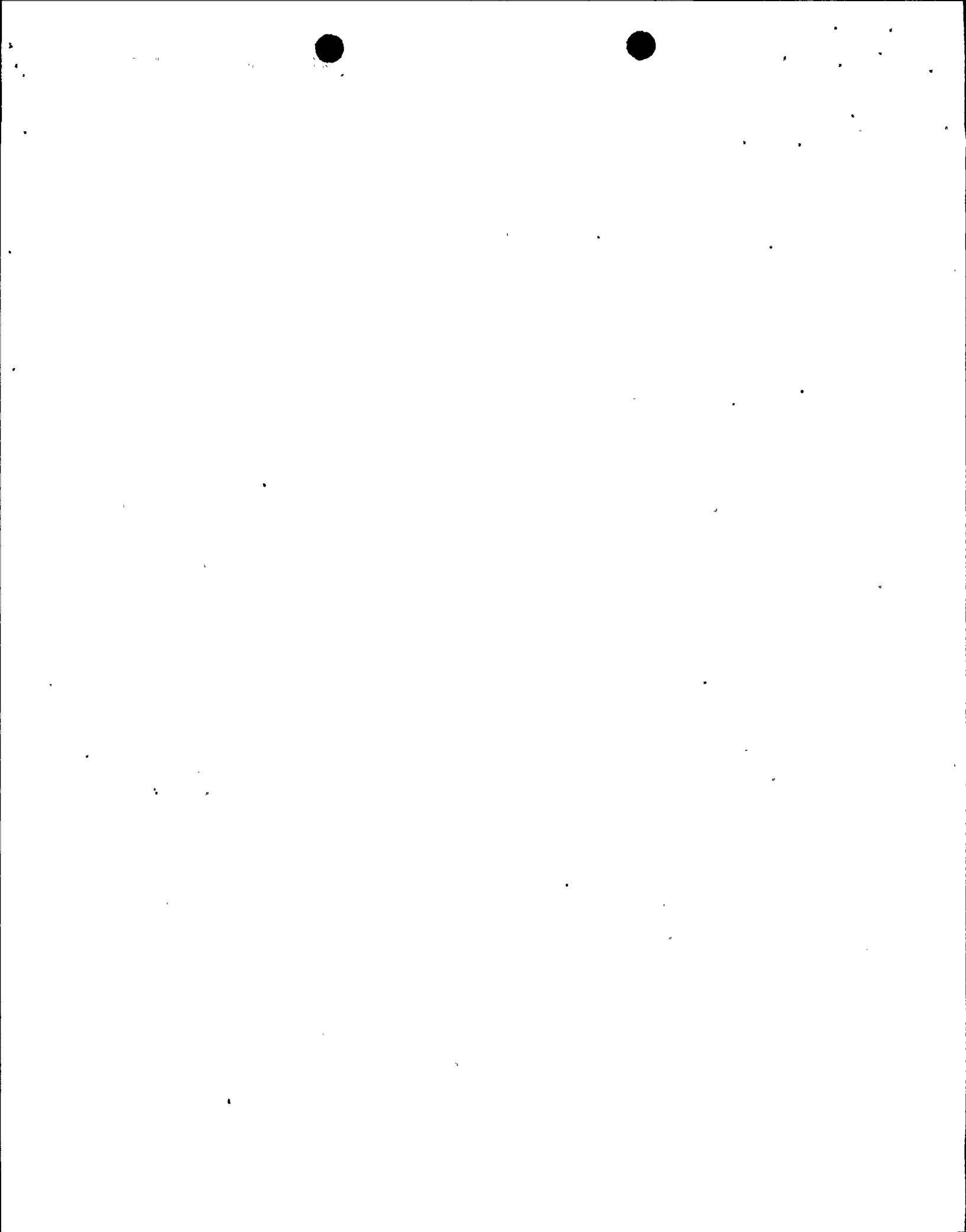
**SAFETY FUNCTIONS OF AFFECTED COMPONENTS**

These changes reflect a change in the organizational structure within the on-site organization responsible for unit operation. There are no systems, structures, or components affected by this change.

**POTENTIAL EFFECTS ON SAFETY**

The proposed specification that the Operations Supervisor-Nuclear hold a Senior Reactor Operators license ensures that a licensed off-shift senior operator is directing the licensed activities of the licensed operators. Requiring a qualified and licensed Operations Supervisor-Nuclear is consistent with the requirements of ANSI N18.1-1971 and ensures there is site-specific detailed relevant technical and systems knowledge in a senior operations management position. Therefore, PP&L concludes that the proposed change is safe and meets the intent of 10 CFR 50.54(l).





**NO SIGNIFICANT HAZARDS CONSIDERATIONS**

**PROPOSED LICENSE AMENDMENT  
FACILITY STAFF REQUIREMENTS**

PP&L has evaluated the proposed Technical Specification changes in accordance with the criteria specified by 10 CFR 50.92 and has determined that the proposed changes do not involve a significant hazards consideration. The criteria and conclusions of that evaluation are presented below.

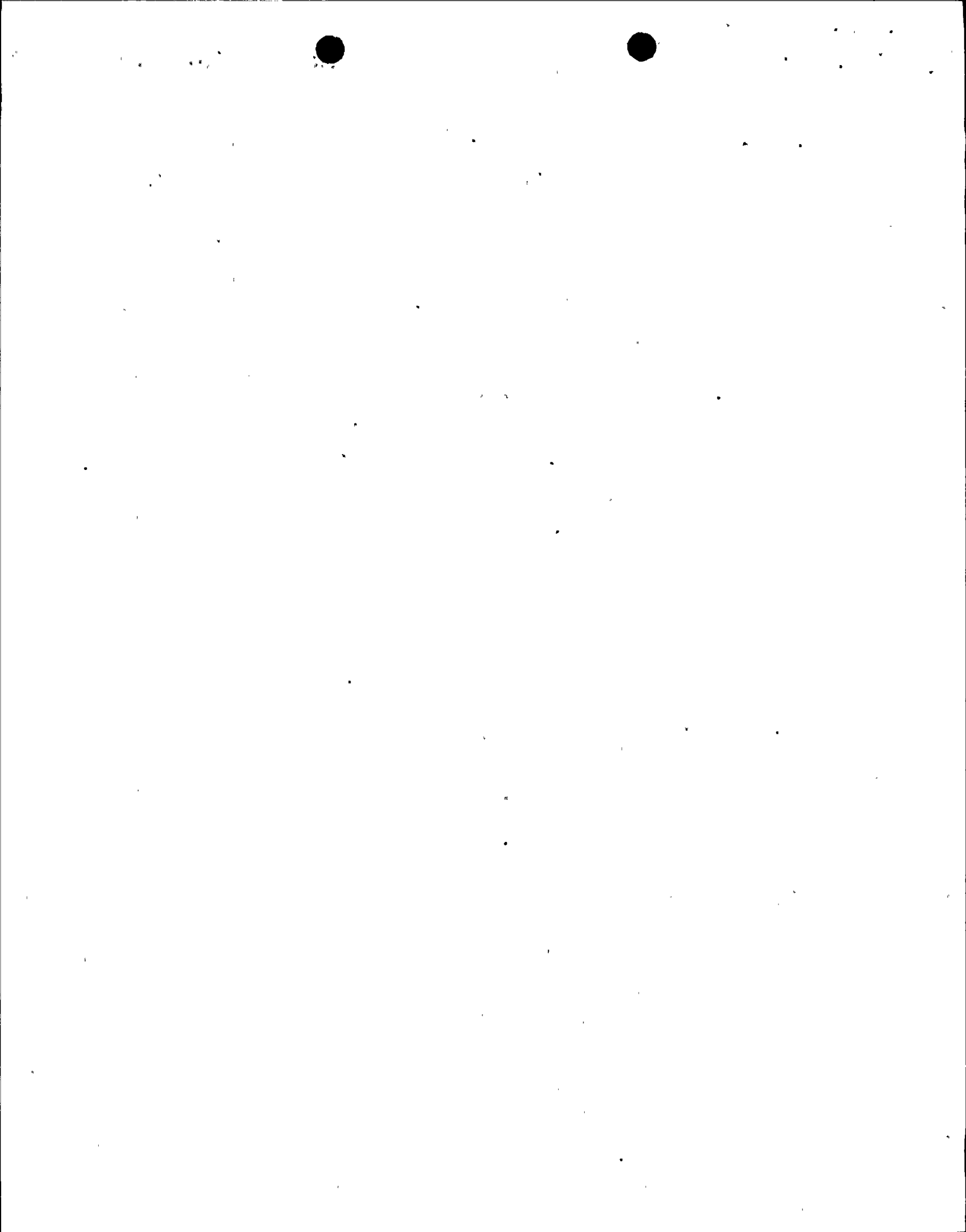
1. **The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.**

The proposed changes affect an administrative control which was based upon the guidance of ANSI N18.1-1971. ANSI N18.1-1971 establishes that the "*Operations Manager*" hold a SRO license. This standard was oriented to an organization where the duty Shift Supervisors reported directly to the "*Operations Manager*". The intent being that the person in the chain of command directly above the duty Shift Supervisors hold a SRO license. Susquehanna SES maintains the position of Operations Supervisor-Nuclear as this person within the chain of command. The position of Operations Supervisor-Nuclear satisfies all of the requirements of ANSI N18.1-1971 for the "*Operations Manager*". These changes retain the commitment to have a member of the unit staff not assigned to shift duties who holds a SRO license.

The proposed changes do not alter the design of any system, structure, or component, nor do they change the way plant systems are operated. They do not reduce the knowledge, qualifications, or skills of licensed operators, and do not affect the way the Operations Group is managed by the Manager-Nuclear Operations. The Manager-Nuclear Operations will continue to maintain the effective performance of operations personnel and ensure that the plant is operated safely and in accordance with the requirements of the operating license. Additionally, the control room operators will continue to be supervised by a licensed senior reactor operator.

The proposed changes do not detract from the Manager-Nuclear Operations ability to perform his primary responsibilities. The Manager-Nuclear Operations is required to achieve the necessary training, skills, and experience to fully understand the operation of plant equipment and the watch requirements for operators.

In summary, the changes retain the commitment to have a member of the unit staff not assigned to shift duties who holds a SRO license. The proposed changes do not detract from the Manger-Nuclear Operations ability to perform his primary responsibilities. Thus, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.



2. **The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.**

The proposed changes to Technical Specification 6.2.2g and 6.3.1 do not affect the design or function of any plant system, structure, or component, nor do they change the way the plant systems are operated. They do not affect the performance of licensed operators. Operation of the plant in conformance with technical specifications and other license requirements will continue to be supervised by personnel who hold a SRO license. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. **The proposed changes do not involve a significant reduction in a margin of safety.**

The proposed changes involve an administrative control that is not related to a margin of safety. The proposed changes do not reduce the level of knowledge or experience required of an individual in the chain of command who serves directly above the duty Shift Supervisors in that the control room operators will continue to be supervised by personnel who hold a SRO license. Thus, the proposed changes do not involve a significant reduction in a margin of safety.

#### ENVIRONMENTAL CONSEQUENCES:

An environmental assessment is not required for the proposed change because the requested changes conform to the criteria for actions eligible for exclusion as specified in 10 CFR 51.22(c)(9). The requested changes will have no impact on the environment. The proposed changes does not involve a significant hazards consideration as discussed above. The proposed changes do not involve a significant change in the types or significant increase in the amount of any effluents that may be release offsite. In addition, the proposed changes do not involve a significant increase in the individual or cumulative occupational radiation exposure.

Marked-up Version of Current Technical Specifications