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SUBJECT: Forwards exigent application for amend to license NPF-22, requesting to allow plant to operate until next outage of sufficient length to allow for containment entry w/"J" SRV acoustic monitor inoperable.

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June 17, 1998

U.S. Nuclear Regulatory Commission  
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**SUSQUEHANNA STEAM ELECTRIC STATION  
EXIGENT REQUEST  
PROPOSED AMENDMENT NO. 183 TO LICENSE NPF-22:  
INOPERABLE UNIT 2 ACOUSTIC MONITOR  
PLA-4928**

**FILE A17-2**

**Docket No. 50-388**

- References:*
1. PLA-4926, R. G. Byram to US NRC, "Request for Enforcement Discretion: Inoperable Unit 2 Acoustic Monitor," dated June 15, 1998.
  2. PLA-4929, R. G. Byram to US NRC, "Supplement To Request For Enforcement Discretion : Inoperable Unit 2 Acoustic Monitor," dated June 16, 1998.
  3. NRC Letter, R. A. Capra to R. G. Byram, "Notice of Enforcement Discretion (NOED) for Pennsylvania Power and Light Company (PP&L), Susquehanna Steam Electric Station (SSES), Unit 2 (TAC No. MA2068, NOED No. 98-6-009)," dated June 16, 1998.
  4. PLA-4684, R. G. Byram to US NRC, "Request for Accelerated Review of ITS Relocation of SRV Acoustic Monitors," dated October 17, 1997.

The purpose of this letter is to propose changes to the Susquehanna SES Unit 2 Technical Specifications in order to allow continued operation with an inoperable safety relief valve (SRV) acoustic monitor. Specifically, our proposed exigent amendment would allow Unit 2 to operate until the next outage of sufficient length to allow for containment entry, not to exceed the ninth refueling and inspection outage (Spring 1999), with the "J" Safety Relief Valve's (SRV) Acoustic Monitor inoperable. This proposal is being submitted consistent with Reference 1, which formed the basis for enforcement discretion granted verbally by the NRC on June 15, 1998 at 1145 hours. Reference 2 provided supplemental information regarding the proposed Technical Specifications as discussed in Reference 1. Reference 3 provides official documentation of the NRC NOED.

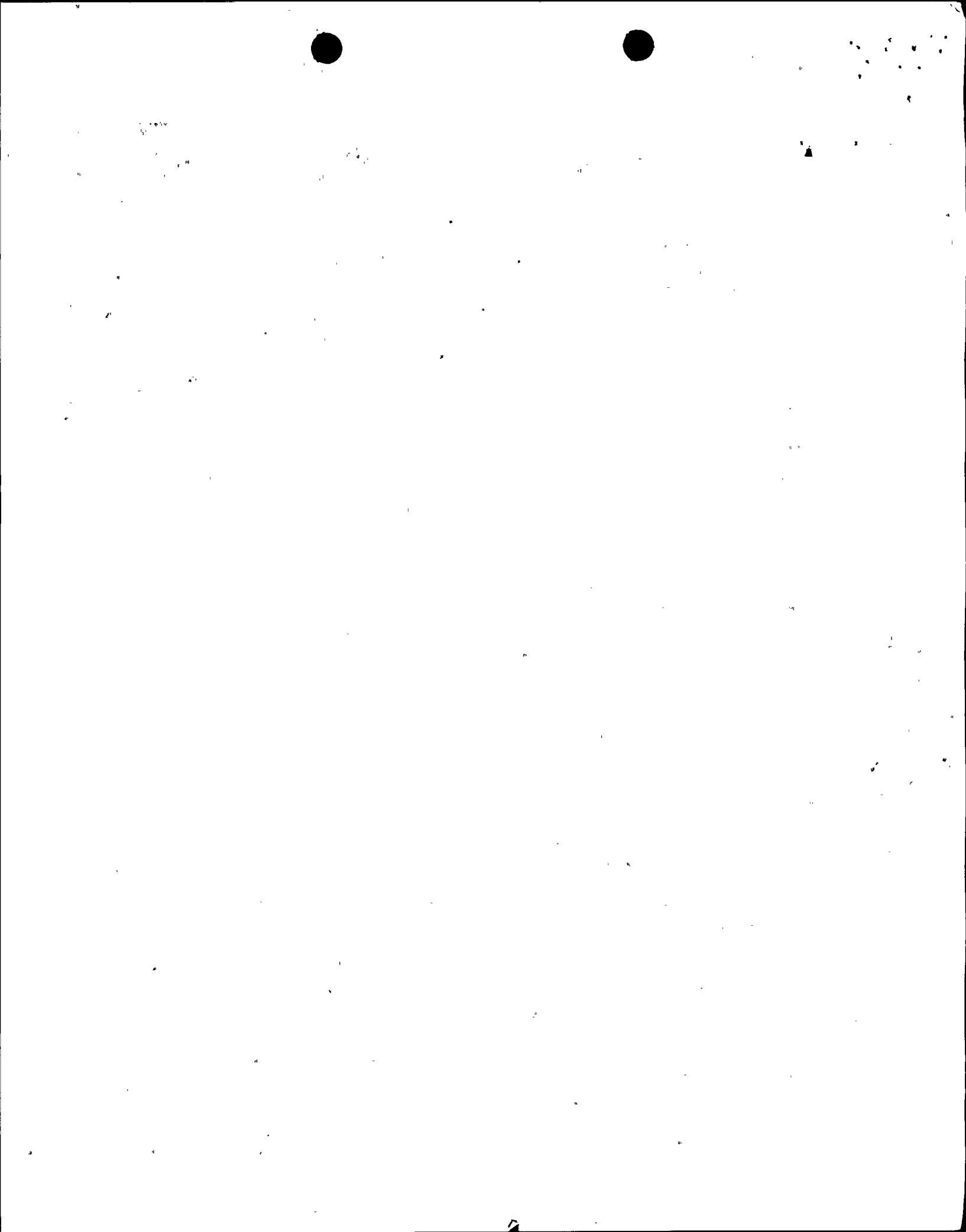
The Improved Technical Specifications (ITS) would relocate the subject requirements to licensee control under 10CFR50.59. As part of contingency planning to avoid the need for further enforcement discretion pending NRC review and approval of PP&L's ITS amendment, a request to accelerate implementation of the specific ITS revisions associated with the acoustic monitors was proposed via Reference 4. This request remains under review by the NRC staff.

Additionally, PP&L is evaluating the following issues discussed at the June 15, 1998 teleconference with the Staff:

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- Corrective actions taken in response to previous acoustic monitor failures;
- Testing of the acoustic monitors; and
- The recent increase in PP&L requests for enforcement discretion.

PP&L is currently developing a response plan regarding these issues, and will provide a separate submittal addressing them in detail. Upon completion of our plan, we will inform the NRC Sr. Resident Inspector and Sr. Project Manager of our schedule for this submittal.

### **Background**

On June 13, 1998, at 1239 hours, SSES Unit 2 control room personnel received the "Main Steam Division 2 SRV Open" alarm. The appropriate Alarm Response procedure was entered. The "J" SRV acoustic monitor display showed all the lights lit, indicating that the SRV was potentially fully open. The status of the "J" SRV was then evaluated using Off Normal procedure ON-283-001, "Stuck Open Safety Relief Valve," and verified closed based on numerous other indications. PP&L's investigation has determined the problem to be with the acoustic monitor system components located inside containment. Repair requires shutdown and containment entry. Since the acoustic monitor cannot be relied upon to provide accurate indication, it was declared inoperable as of 1239 hours and the appropriate actions under Limiting Conditions for Operation (LCOs) 3.3.7.5 and 3.4.2 were taken. On June 15, 1998, PP&L was granted enforcement discretion from these requirements.

### **Basis for Amendment Request Under Exigent Circumstances**

Susquehanna SES Unit 2 is currently operating in Operational Condition 1 at 100% power. Repair of the inoperable acoustic monitor requires taking Unit 2 to cold shutdown, de-inerting the containment, making a containment entry to repair/replace the acoustic monitor failed component. As described in Reference 1, PP&L believes that this shutdown would represent an unwarranted transient on Unit 2.

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

- (1) First, it must be established that an emergency exists, "...in that a licensee and the Commission must act quickly and that time does not permit the Commission to publish a *Federal Register* notice allowing 30 days for prior public comment... ." 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. A request for enforcement discretion to continue operation was prepared and submitted on June 15, 1998. The NRC granted the enforcement discretion verbally on June 15, 1998 at 1145 hours. Susquehanna SES Unit 2 power ascension was reinitiated after NRC verbal approval, and Unit 2 reached 100% power at 0203 hours on June 16, 1998. 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.
- (2) Secondly, 10CFR50.91 require the license to "... explain the exigency and why the licensee cannot avoid it... ." 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 not 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.

### Supporting Information

Attachment 1 presents the safety assessment for the change request. This assessment concludes that the proposed has a negligible impact on risk, and does not significantly increase the consequences of an accident previously evaluated in the FSAR.

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 will not impact the environment. Therefore, no environmental consequences that have not been previously evaluated are anticipated.

Attachment 3 contains marked-up pages from the 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.

We trust that this letter provides sufficient information to support your review and acceptance of our proposed Technical Specification change. In the event that additional information is required, or if you have any additional questions, please contact Mr. J. M. Kenny at (610) 774-7535.

Sincerely,



R. G. Byram

Attachments

copy: NRC Region I  
Mr. K. Jenison, NRC Sr. Resident Inspector - SSES  
Mr. V. Nerses, NRC Sr. Project Manager - Rockville  
Mr. K. Kerns, PA DEP/BRP

