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SUBJECT: Proposes exemption to 10CFR50 App J section II.H.4 re scope of Type 'C' testing on containment isolation valves. Forwards amends 182 & 137 to licenses NPF-14 & NPF-22, eliminating need to perform certain Type 'C' tests.

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MAR 15 1995

U. S. Nuclear Regulatory Commission
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**SUSQUEHANNA STEAM ELECTRIC STATION
PROPOSED EXEMPTION TO 10CFR50 APPENDIX J AND
PROPOSED AMENDMENT NO. 182 TO LICENSE NPF-14 AND
PROPOSED AMENDMENT NO. 137 TO LICENSE NPF-22:
APPENDIX J TYPE 'C' TESTING REQUIREMENTS
PLA-4282 FILES A17-2/R41-1**

Docket Nos. 50-387
and 50-388

This letter proposes an exemption to 10CFR50 Appendix J section II.H.4, concerning the scope of Type 'C' testing on containment isolation valves. To support implementation of the exemption, changes to Susquehanna SES Technical Specification Table 3.6.3-1, Primary Containment Isolation Valves, are also proposed.

Currently, Susquehanna Technical Specifications implement a requirement of Appendix J involving Type 'C' testing of HPCI, RCIC, Core Spray, and RHR primary containment isolation valves (CIVs) that serve lines which terminate below the suppression pool minimum water level. This requirement has been determined to be unnecessary to ensure that post-accident radiological releases from the containment are minimized consistent with the existing accident analysis. Adequate testing, to ensure valve operability and position indication, can be performed via ASME Section XI. The proposed exemption and Technical Specification change will eliminate the need to perform certain Type 'C' tests.

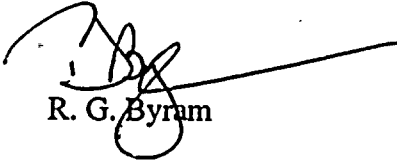
The attached analysis discusses the safety basis for the proposed exemption and Technical Specification change and concludes that the change involves no significant hazards. The change has been reviewed by the Plant Operations Review Committee and the Susquehanna Review Committee. We are committed to making this change to reduce manpower related costs associated with unnecessary valve testing and maintenance, and to significantly reduce personnel radiation exposure. The proposed change is expected to yield benefits of \$75,000 per year for the remainder of plant life. The proposed change meets the Cost Beneficial Licensing Action criteria as outlined in NRC Administrative Letter, 95-02. The NRC has previously provided guidance on the acceptability of the proposed exemption in an SER issued on October 30, 1986 for Georgia Power Company, Edwin I. Hatch Nuclear Plant.

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We would like to incorporate the proposed change into work planning for the third quarter of 1995. As a result, we ask that the NRC complete its review by June 30, 1995. Any questions regarding this request should be directed to Mr. Terence Bannon at (610) 774-7918.

Very truly yours,



R. G. Byram

Attachment

cc: NRC Region I
Mr. C. Poslusny, Jr., NRC Sr. Project Manager - OWFN
Ms. M. Banerjee, NRC Sr. Resident Inspector - SSES
Mr. W. P. Dornsife, PA DER