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SUBJECT: Forwards proposed Amends 183 & 138 to Licenses NPF-14 & NPF-22, relocating response time limit tables from TS to FSAR, per GL 93-08.

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**SUSQUEHANNA STEAM ELECTRIC STATION
PROPOSED AMENDMENT NO. 183 TO LICENSE NPF-14 AND
PROPOSED AMENDMENT NO. 138 TO LICENSE NPF-22:
RELOCATION OF TECHNICAL SPECIFICATION
TABLES OF INSTRUMENT RESPONSE TIME LIMITS
PLA-4300**

FILE R41-2

**Docket Nos. 50-387
and 50-388**

Dear Sir:

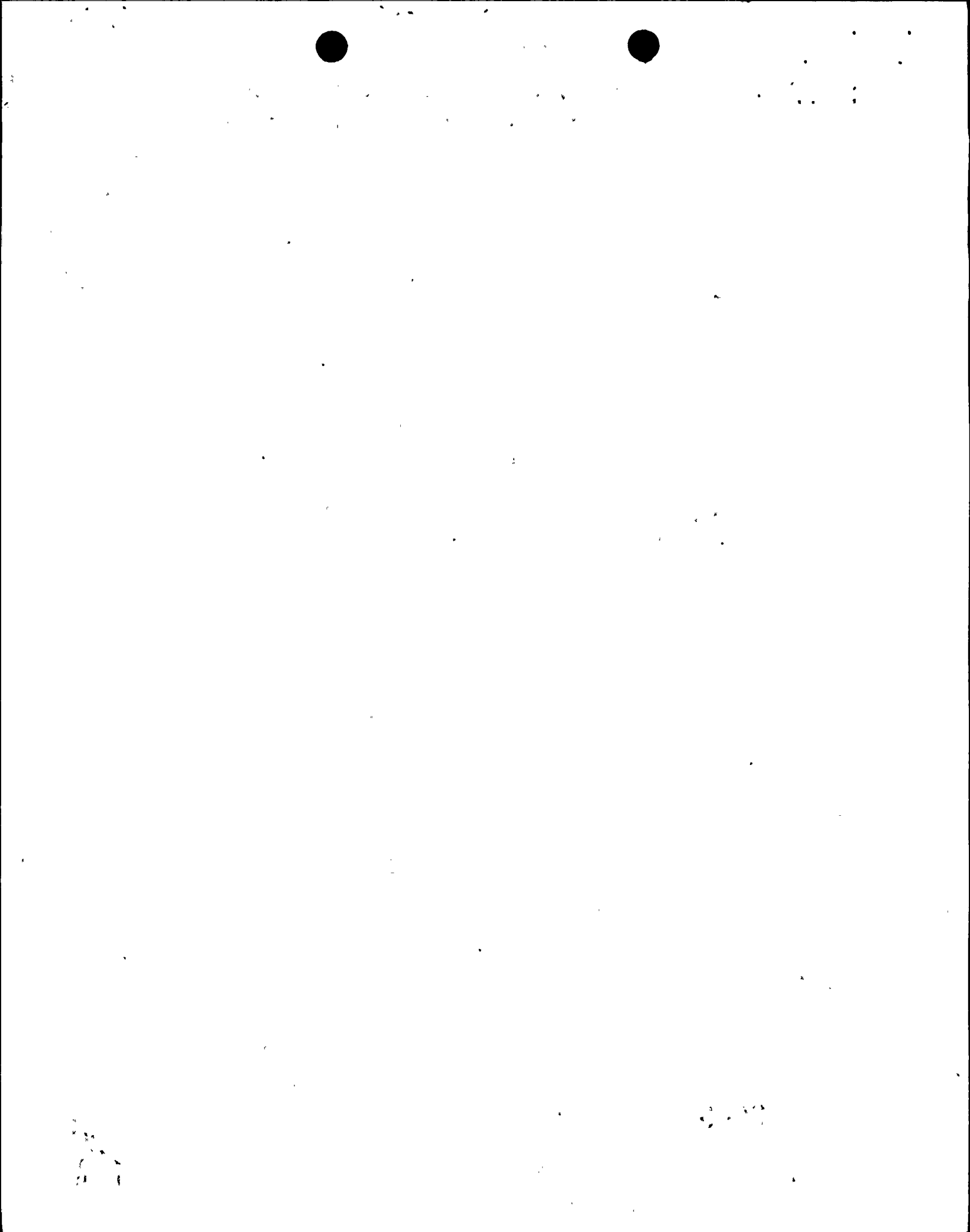
The purpose of this letter is to forward proposed amendments to the Susquehanna Steam Electric Station (SSES) Unit 1 and Unit 2 Technical Specifications (Tech. Spec.). The proposed changes relocate response time limit tables from the Tech. Specs. to the Final Safety Analysis Report (FSAR). This modification is a line item Tech. Spec. improvement as described in Generic Letter 93-08, "Relocation of the Technical Specification Tables of Instrument Response Time Limits," dated 12/29/93.

Relocation of the response time limit tables from the Tech. Specs. to the FSAR will allow us to administratively control changes to these tables in accordance with the provisions of 10CFR50.59 without the need to process a license amendment request. Upon approval of this Tech. Spec. change request, we plan to begin revising these response time limit tables in accordance with the provisions of 10CFR50.59 and pursuant to the requirements of NRC's Safety Evaluation Report "Evaluation of Boiling Water Reactor Owners Group Topical Report NEDO-32291, System Analysis for Elimination of Selected Response Time Testing Requirements". This change will result in reduction of manpower related costs associated with response time testing, improvements in plant safety and significantly reduce personnel radiation exposure as discussed in Attachment 1 to this letter. The proposed change is expected to yield benefits of \$67,500 per refueling outage for the remainder of plant life. The proposed change therefore meets the Cost Beneficial Licensing Action criteria as outlined in NRC Administrative Letter 95-02.

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Pennsylvania Power & Light Company requests that this change be approved by September 1, 1995.

If you have any questions, please contact Mr. J. B. Wesner at (610) 774-7911.

Very truly yours,

A handwritten signature in black ink, appearing to read 'R. G. Byram', is written over a horizontal line.

R. G. Byram

Attachments

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

SAFETY ASSESSMENT

RELOCATION OF TECHNICAL SPECIFICATION TABLES OF INSTRUMENT RESPONSE TIME LIMITS

BACKGROUND

SSES Tech. Specs. contain limiting conditions for operation (LCO) for the Reactor Protection System (RPS) instrumentation, the Isolation System instrumentation, and the Emergency Core Cooling System (ECCS) instrumentation. These systems are required to be operable with the response times as specified in the associated Tech. Spec. tables. The surveillance requirements specify that these systems be tested by verifying that the response time of each function is within certain limits as specified. Generic Letter 93-08 provides guidance for relocating the Tech. Spec. tables containing these various response times from Tech. Specs. to the FSAR.

SSES plant procedures provide the acceptance criteria for the response time limits identified in the Tech. Spec. tables. In accordance with Generic Letter 93-08, these procedures will continue to include, as applicable, acceptance criteria for the associated response time limits. In addition, the SSES FSAR will be revised to include the response time limits and associated footnotes. Also, Tech. Spec. Bases will be revised to reference the location of the response time limits in the FSAR. The FSAR changes will be submitted to the NRC in accordance with 10CFR50.71(e).

DESCRIPTION OF THE CHANGE

The SSES FSAR will be revised to include information currently identified in Tech. Spec. Table 3.3.1-2, "REACTOR PROTECTION SYSTEM RESPONSE TIMES," Table 3.3.2-3, "ISOLATION SYSTEM INSTRUMENTATION RESPONSE TIME," and Table 3.3.3-3, "EMERGENCY CORE COOLING SYSTEM RESPONSE TIMES." The FSAR will be annotated to include information describing how response time limits will be applied instead of the current Tech. Spec. footnotes. Refer to the attached marked-up Tech. Specs.

SAFETY ANALYSIS

The relocation of the response time limit tables from the Tech. Specs. to the FSAR has no effect on plant safety since there is no change in the surveillance or system requirements for the subject systems. In association with this Tech. Spec. change, PP&L will begin revising these response time limit tables in accordance with the provisions of 10CFR50.59 and pursuant to the requirements of NRC's SER of NEDO-32291, as stated above. These changes will provide improvements in plant safety and operations by: 1) reducing the time safety systems are

unavailable, 2) reducing safety system actuations, 3) reducing shutdown risk, 4) limiting radiation exposure to plant personnel, and 5) eliminating the diversion of key personnel to conduct unnecessary testing. Therefore, this change produces an improvement in plant safety.

NO SIGNIFICANT HAZARDS CONSIDERATIONS

- I. *This proposal does not involve a significant increase in the probability or consequences of an accident previously evaluated.*

The purpose of the proposed Tech. Spec. change is to delete and subsequently relocate Tech. Spec. Table 3.3.1-2, Table 3.3.2-3, and Table 3.3.3-3, to the SSES FSAR consistent with the guidance provided in Generic Letter 93-08. This is a line item Tech. Spec. improvement change recommended by the NRC in Generic Letter 93-08. This change will allow PP&L to administratively control subsequent changes to the response time limits in accordance with 10CFR50.59. The procedures that contain the various response time limits are also subject to the change control provisions in the Administrative Controls section of the Tech. Specs. The proposed change only relocates the existing response time limits; the surveillance requirements and associated Actions are not affected and remain in the Tech. Specs. Relocating the response time limit information does not affect the analysis of any design basis accident. The response times of these systems will be maintained within the acceptance limits assumed in SSES safety analyses and required for successful mitigation of an initiating event. Also, since any subsequent changes to the FSAR or procedures will be evaluated in accordance with 10CFR50.59, no increase in the probability or consequences of an accident previously evaluated will occur. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

- II. *This proposal does not create the possibility of a new or different kind of accident from any accident previously evaluated.*

As discussed above, the proposed Tech. Spec. changes do not affect the capability of the associated systems to perform their intended function within the acceptance limits assumed in SSES safety analyses and required for successful mitigation of an initiating event. The proposed change does not involve a physical modification of the plant or changes in methods governing normal plant operations. The proposed change will not impose any different operational or surveillance requirements. This change only proposes to relocate these requirements to other plant documents whereby adequate control of information will be maintained. No new failure modes will be introduced. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

III. This change does not involve a significant reduction in a margin of safety.

The proposed change will not reduce a margin of safety because it has no impact on any safety analysis assumption. The proposed change does not alter the scope of equipment currently required to be OPERABLE or subject to testing, nor does the proposed change affect any instrument setpoints or equipment safety functions. Since any future changes to these requirements in the FSAR or procedures will be evaluated per the requirements of 10CFR50.59, no reduction in a margin of safety will occur. Therefore, the change does not involve a significant reduction in a margin of safety.

Considering the above, we conclude that the proposed Tech. Spec. changes do not involve significant hazards considerations.

IMPLEMENTATION

Pennsylvania Power & Light Company requests that this change be approved by September 1, 1995 with a 60 day implementation period in order to accomplish procedure revisions associated with this change.

