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U. S. Nuclear Regulatory Commission
Attn.: Document Control Center
Mail Stop P1-137
Washington, D.C. 20555

**SUSQUEHANNA STEAM ELECTRIC STATION
REQUESTED INFORMATION ASSOCIATED WITH
PROPOSED AMENDMENTS NO. 205 TO LICENSE
NO. NPF-14 AND NO. 170 TO LICENSE NO. NPF-22:
MAIN STEAM LINE RADIATION MONITOR SETPOINT
CHANGE AND CHANGE TO RADIOACTIVE GASEOUS
EFFLUENT MONITORING SYSTEM
PLA-4977 FILES R41-2/A17-2**

Docket Nos. 50-387
and 50-388

- Reference: 1) R. G. Byram to USNRC, "Proposed Amendment No. 205 to License NPF-14 and Proposed Amendment No. 170 to License NPF-22: Main Steam Line Radiation Monitor Setpoint Change and Change to Radioactive Gaseous Effluent Monitoring System," dated March 16, 1998 (PLA-4822).
- 2) R. G. Byram to USNRC, "Calculations Supporting a Revision to the Licensing Basis for the Offgas System," dated February 9, 1998 (PLA-4840).
- 3) R. G. Byram to USNRC, "Withdrawal of Expedited Review/Approval of Technical Specifications/Bases 3/4.3.7.11 and 3/4.11.2.6 Pursuant to ITS and Response to Request for Additional Information - Offgas System Modifications," dated May 22, 1998 (PLA-4882).
- 4) R. G. Byram to USNRC, "Response to Verbal RAI Related to Offgas System Review," dated August 10, 1998 (PLA-4964).

This letter supersedes PLA-4974, titled "Withdrawal of Proposed Amendment No. 205 to License No. NPF-14 and Proposed Amendment No. 170 to License No. NPF-22: Main Steam Line Radiation Monitor Setpoint Changes and Changes to Radioactive Gaseous Effluent," dated September 1, 1988, in its entirety.

The referenced proposed Technical Specification amendment (reference 1) and the request for review of the offgas design (reference 2) were submitted prior to issuance of the Improved Technical Specifications (ITS). The two submittals were being processed as a single change to the Susquehanna SES (SSES) license in support of PP&L implementation of Hydrogen Water Chemistry (HWC). The ITS amendment was subsequently issued on July 31, 1998. In

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accordance with ITS those sections of the proposed Technical Specification amendment have been relocated to the Technical Requirements Manual (TRM), which can be revised by PP&L utilizing the 10CFR50.59 process; therefore, the requested changes to the Technical Specifications are no longer required. However, NRC review and authorization of the changes in references 1 and 2 are still required since the requested changes are now considered to be unreviewed safety questions in accordance with 10CFR50.59. Upon NRC authorization, appropriate updates will be made to the Final Safety Analysis Report (FSAR) and the TRM. The letters referenced above provide the basis to support NRC's review of the technical issues.

In a subsequent discussion with the NRC, two requests were made. The requests and associated responses are stated below.

Request 1: Explain the nonradiological consequences on the environment associated with the loss of hydrogen gas.

Response: EPRI Report NP-5283-SR-A titled "Guidelines for Permanent BWR Hydrogen Water Chemistry Installations -1987," provides guidelines for the installation of systems related to HWC. The EPRI report addresses, in part, design considerations for systems where the effects of the non-radiological consequences on the environment associated with the loss of hydrogen is a concern. The SSES HWC design incorporates the relevant EPRI guidance which was approved by the NRC in an SER dated July 13, 1987. PP&L has also concluded that the additional hydrogen stored at SSES to support the operation of HWC does not significantly change the environmental impact of a hydrogen accident previously evaluated.

Request 2: Explain the radiological consequences associated with failures to the offgas system after implementation of HWC.

Response: FSAR section 15.7.1.1.5 provides the radiological consequences associated with a failure of the Offgas Treatment System. The radiological consequences associated with a failure of the Offgas Treatment System after HWC implementation is bounded by the calculational methodology and regulatory limits as described in FSAR section 15.7.1.1.5.

In summary, PP&L requests that the NRC authorize changes to the FSAR to reflect the increase in the setpoint values and allowable values for the main steam line radiation monitor at SSES Unit 1 and Unit 2. Further, PP&L requests that the NRC authorize a change to the offgas system design basis to reflect a detonation resistant design as set forth in references 1 and 2, as supplemented by references 3 and 4. PP&L will submit the resulting changes to the FSAR in accordance with 10CFR 50.71(e).

If you have any questions concerning this request please contact Mr. J. M. Kenny at (610) 774-7535.

Sincerely,



R. G. Byram

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



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