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 AUTH.NAME AUTHOR AFFILIATION
 BYRAM, R.G. Pennsylvania Power & Light Co.
 RECIP.NAME RECIPIENT AFFILIATION
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98-09

SUBJECT: Informs that PP&L has completed required study & has concluded that downcomer water level does not drop below TAF in boildown transient with no HPI as long as ADS is initiated before Wide Range indicated level drops to -91".

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Robert G. Byram
Senior Vice President
Generation and Chief Nuclear Officer
Tel. 610.774.7502 Fax 610.774.5019
E-mail: rgbyram@papl.com

PP&L, Inc.
Two North Ninth Street
Allentown, PA 18101-1179
Tel. 610.774.5151
http://www.ppl-inc.com/



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**SUSQUEHANNA STEAM ELECTRIC STATION
FOLLOW UP RESPONSE TO NRC FIRE PROTECTION
FUNCTIONAL INSPECTION NRC INSPECTION
REPORT NOS. 50-387/98-09 & 50-388/98-09
PLA-5074**

Docket Nos. 50-387
and 50-388

Reference: PLA-5016, R.G. Byram to USNRC, "Response to NRC Fire Protection Functional Inspection NRC Inspection Report Nos. 50-387/98-09 & 50-398/98-09," December 3, 1998.

In PP&L's response to NRC's NOV 98-09-A (Inspection Report Numbers 50-387/98-09 & 50-398/98-09), provided in PLA-5016, we committed to perform a study to determine the efficacy of revising the minimum water level for operator initiation of ADS such that downcomer water level remains above top of active fuel (TAF).

PP&L has completed the required study and has concluded that the downcomer water level does not drop below TAF in a boildown transient with no high-pressure injection as long as ADS is initiated before Wide Range indicated level drops to -91".

Revising the plant procedures necessary to implement such a change in shutdown philosophy represents a significant adjustment to our operations because the changes involve the plant's emergency operating procedures and associated operator retraining.

Subsequent to the referenced PP&L NOV response, the issue of using safety relief valves and low pressure systems as an Appendix R, Section III.G.1 and 2 shutdown path has become a generic issue for boiling water reactors. The Boiling Water Reactor Owner's Group (BWROG) has submitted a position paper entitled "BWROG Position on the Use of Safety Relief Valves and Low Pressure Systems as Redundant Safe Shutdown Paths" for NRC review. PP&L endorses the position taken by the BWROG. The NRC Staff is currently reviewing the BWROG position paper.

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In view of the operational impacts described above, the position taken by the BWROG that such a change is not required, and the ongoing review of the BWROG position paper, PP&L has determined that it is appropriate to make resolution of the generic issue a prerequisite to our decision to implement any operational changes.

In summary, PP&L has satisfied its commitment to perform a study to determine the efficacy of revising the minimum water level for operator initiation of ADS such that downcomer water level remains above TAF. However, we do not plan to initiate actions to revise plant procedures until resolution of the industry generic issue is reached and that resolution requires such actions.

If you have any questions, please contact Mr. W. W. Williams at (610) 774-7742.

Sincerely,



R.G. Byram

copy: Regional Administrator - Region I
Mr. S.L. Hansell, NRC Acting Sr. Resident Inspector
Mr. V. Nerses, NRC Sr. Project Manager

