

TWO NORTH NINTH STREET, ALLENTOWN, PA. 18101

NORMAN W. CURTIS Vice Prosident-Engineering & Construction-Nuclear 770-5381

June 9, 1981

Docket Nos. 50-387 & 50-388

Mr. A. Schwencer, Chief Licensing Branch No. 2 Division of Licensing U.S. Nuclear Regulatory Commission Washington, D.C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION REVISED RESPONSE TO COMMON REACTOR VESSEL LEVEL INSTRUMENTATION REFERENCE - SER OPEN ITEM NO. 99. ER100450 FILE 841-2, -12 PLA-797

Dear Mr. Schwencer:

This letter provides a revised response to NUREG-0737, requirement II.K.3.27. This response completes our action and will allow closeout of open item no. 99.

Susquehanna SES reactor vessel water level instrumentation uses two reference points: instrument zero and the top of the active fuel. Only one pair of instruments LR-1R615 and LI-1R610, which are not normally used during operation, make use of the top of active fuel reference point. All of the remaining indicators make use of the instrument zero. reference. In order to avoid operator confusion and provide the operator with a common reference as to what the reactor vessel water level is PP&L will, prior to fuel load, be taking two actions. The first is to provide a mimic of the vessel as close to each water level indicator as panel layout will allow (in most cases this is immediately adjacent to the instrument). This mimic (a rough version of which is included as attachment A) will show the relationship of the instrument range to various important levels in the reactor. The placement of these mimics, as illustrated for a sample case in attachment B, will provide the operator with not only a common reference but also a quick indication as to the relationship of the water level to some important reactor points.

The second action being taken by PP&L is also designed to provide the operator with both an understanding of the meaning of the reactor vessel water level information and the relationship between that level and certain key points in the vessel. This is being accomplished by a

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PENNSYLVANIA POWER & LIGHT COMPANY

Page Two June 9, 1981 Mr. A. Schwencer

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computer driven CRT color display, a black and white sample of which is given in attahcment C. This display will provide the operator with a dynamic representation of level and, as part of the display, a twentyminute trend of level.

We believe that these actions properly address and resolve the NRC's concern as to the potential for improper operator action due to the misinterpretation of a scale on a reactor vessel water level indicator caused by a diversity of reference points.

Very truly yours,

N.W. Curtis Vice President-Engineering and Construction-Nuclear

Attachment

cc: R.M. Stark - NRC













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Mr. Norman W. Curtis Vice President - Engineering and Construction Pennsylvania Power & Light Co. Two North Ninth Street Allentown, PA 13101

.: 50-387 and 50-388

JUN 1 () 1981 U.S. NUCLEAR REQUIATORN COMMISSION

Dear Mr. Curtis:

Docket Nos.:

SUBJECT: PP&L APPEAL OF THE NRC STAFF POSITION REGARDING LOW PRESSURE CONTAINMENT LEAKAGE TEST FREQUENCY

Pennsylvania Power & Light Company has proposed that the test frequency for the low pressure steam bypass test be the same as that required for the Integrated Leak Rate Tests (ILRT), i.e., about every 3 1/3 years. The first test would be performed during the initial ILRT and then during every subsequent ILRT.

The NRC position as reflected in SRP 6.2.1.1c is that periodic leak testing be performed at each refueling, an approximate 18-month period.

The applicant has requested the 3-year interval based on the added integrity to be gained from specific design features; including, continuous liner plates, seamless downcomer pipe, flued SRV heads at the point of diaphragm slab penetrations, and seal welded plates at penetrations of the diaphragm slab.

The NRC has considered these design items and the high degree of potential protection to be gained from their presence. However, the newness of the Mark II design and the importance of protecting against the relatively low capability for accommodating steam bypass inherent in this design requires that an early record of bypass integrity be proven through periodic testing at about the refueling interval.

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Norman W. Curtis

It is reasonable to conclude that when the PP&L Susquehanna Steam Electric Station and the other Mark IIs with similar or equivalent design features have provided a demonstration, through the period refueling cycle inspection, that bypass integrity does not segrade with service, PP&L should provide the staff with this information so that a less restrictive testing frequency may be adopted.

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Sincerely,

Original signed by Robert L. Telesco

Robert L. Tedesco, Assistant Director for Licensing Division of Licensing

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