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SUBJECT: Lists discrepancies which have arisen from review of SER per NUREG-0776.

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

June 23, 1981

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

SUSQUEHANNA STEAM ELECTRIC STATION  
SER REVIEW COMMENTS  
ER 100450      FILE 841-2      PLA-858

Dear Mr. Schwencer:

The attached document lists those discrepancies which have arisen from our review of the Safety Evaluation Report you have issued for Susquehanna Steam Electric Station (NUREG 0776).

With respect to the listing, the numbers to the left are the SER section, page, complete paragraph on that page, and line in that paragraph respectively, unless otherwise indicated.

Please review these comments and incorporate them in the next SER revision. If you have any questions, please contact us.

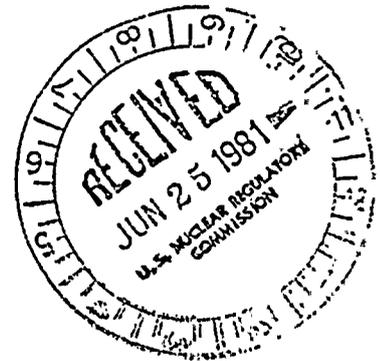
Very truly yours,



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

RRS/mjm

Attachment



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PENNSYLVANIA POWER & LIGHT COMPANY

8106260331

COMMENTS ON SSES SAFETY EVALUATION REPORT (NUREG 0776)

- 1.3/1-4/2/5                   Item (3): The Standby Gas Treatment System and the Reactor Building Recirculation System should be included in this group.
- 1.3/1-4/2/11                  Item (9): Delete (and add to (3)).
- 2.1.1/2-1/1/5                The site is also 15 miles northwest of the city of Hazleton; this should be added for a complete description.
- 2.1.3/2-1/4/3                The 1980 estimated population was 2702 persons; the projection for 2020 is now 2948 persons. Reference FSAR Table 2.1-7.
- 2.2.1/2-5/3/All              PL has provided data on potential explosions on the back roads T419, 438 and 456. Also, data on toxic accidents on U.S. Route 11 has been provided.
- 2.2.2/2-6/3/1                Berwick Municipal Airport is no longer in operation. The former airport land is now under cultivation.
- 2.3.2/2-9/1/7                Where is footnote 2?
- 2.4.3/2-13/3/2                (SRBC) should be added here after Commission as a reference.
- 2.4.3/2-13/4/2                The sentence beginning: "At present,..." is incomplete. At the present time there are two options to replace the station water consumed during periods of low flow. The preferred one is to purchase water from the U.S. Army Corps of Engineers' Corvanesque Reservoir located in Tioga County, Pennsylvania. The second option is for the applicant to construct the Pond Hill Reservoir in a small tributary of the Susquehanna River about 2.3 miles upstream of the site.
- 2.4.3/2-13/6/All              The Susquehanna River Basin Commission has set July 1, 1984 as the date the station must be in compliance with the low flow requirements. The shut down possibility should be indicated to be dependent on SRBC directives.
- 3.4.1/3-6/4/6                10 feet. should be 120 feet.
- 3.4.1/3-7/1/3                Change equipment to equipped.
- 3.4.2/3-7/4/2                458 should be 548.

3.9.2/3-24/2/1	Issues should be singular; there is but one described.
4.1/4-1/2/3	It should be pointed out that the standby liquid control system can perform this shutdown function independent of the control rod drive system.
TABLE 4.1/p.4-3	The Channel Thickness values for 7X7 and improved 8X8 Susquehanna are interchanged. Also, there are 3 different uranium weights for the improved 8X8 Susquehanna: 402.23, 402.85, and 403.4 pounds per assembly.
4.2.3.2/4-5/4/5	The document is NEDO-23786-1.
4.2.3.5/4-7/ /5	This should read gadolinia-urania.
4.2.3.12/4-10/ /	The use of the word "box" throughout this section should be deleted. PL does not use this terminology. Wording should be altered to accommodate these deletions.
4.2.3.14/4-12/3/	We have not committed to destructive examinations; reference PLA-623, February 11, 1981.
4.4/4-14/3/3	PL suggests the words "62 fuel rods and 2 water rods" in place of "64 rods" here.
4.4/4-16/1/3	This should read "defined as the ratio of".
4.4/4-17/3/8	This should be "mean prediction", not man prediction.
4.4/4-18/1/All	PL has forwarded a description of the loose parts monitoring system to the NRC as a FSAR change.
4.4/4-18/2/8	Item 1 should read "Part loop operation or natural circulation of Susquehanna".
4.5.1/4-19/2/4	"Structure" should be deleted.
4.5.1/4-19/4/7	This should read "control rod drive system".
5.1/5-1/1/6	HPCI should be included as part of the reactor coolant pressure boundary.
5.2.5/5-9a/1/3	This should read "completely leak tight".
5.2.5/5-9a/2/4	The sources of unidentified leakage listed here are incorrect. This listing should be replaced by: "vent coolers, control rod drive flange leakage, chilled water drains, and cooling water drains."

- 5.2.5/5-9a/3/7 This sentence should read: "Safety relief valve leakage is detected by acoustic monitors in the discharge line; leakage is annunciated in the control room."
- 5.2.5/5-9a/5/1 An increase in pressure should be added here as a leakage indication.
- 5.2.5/5-9a/5/5 The sentence should read: "Increase in recirculation pump seals cooling water temperature is indicated..."
- 5.2.5/5-9a/6/ References to HPCI in this paragraph should read "high pressure coolant injection" (lines 2 and 7).
- 5.4.1/5-22/2/ PL suggests the addition of the following sentence to the end of this paragraph: "A vacuum breaker line which is open to the suppression pool atmosphere has been installed downstream from the check valve as well."
- 5.4.2/5-22/4/2 There is also one heat exchanger per independent loop in the RHR system.
- 5.4.2/5-25/1/21 This should be core spray pump head-flow, not RHR.
- 6.2.1/6-29/2/4 The third sentence, referring to a PL commitment to confirm the adequacy of the piping system based on LaSalle tests, is not true and should be deleted.
- 6.2.1/6-29/2/9 The Generic Issues Branch is presently developing a NUREG which will allow a rise in the 200° suppression pool temperature based on the plant specific quencher submergence.
- 6.2.2/6-29/4/2 There are four main system pumps in the two complete loops.
- 6.2.3/6-30/6/4 PL suggests the addition of the words "in affected areas" after "secondary containment pressure".
- 6.2.5/6-35/5/6 The SSES FSAR indicates the recombiners to be Safety Class 2; Quality Group is not applicable.
- 6.3.2.1/6-41/4/4 This sentence is true only for HPCI. For LPCI and core spray, low reactor pressure has to be reached in order to open the valves.
- 6.3.2.3/6-43/ /10 The PL response to SER Open Item 33 indicates that there is adequate NPSH for the ECCS pumps for longer than the 10 minutes stated.
- 6.3.2.3/6-43/2/13 PL suggests changing the period to a comma and



adding the words "or when high water level in the suppression pool is reached."

6.3.2.3/6-44/2/10 High point venting of the ECCS injection lines has been incorporated in the SSES Technical Specifications.

6.3.4/6-46/1/All This paragraph seems inconsistent with the open item relating to clad ballooning and rupture. PL does not believe that PCI and clad oxidation are sufficient to demonstrate a coolable geometry.

6.4/6-48/ /4 This should read "fire protection control damper."

6.4/6-48/ /5 This should read "duct system, and discharge into..."

6.4/6-48/2/4 Safety injection is not applicable to a BWR. PL suggests adding the words ",the control structure isolation signal, the reactor building isolation signal," after "accident signal".

6.5.2.1/6-48/5/8 The vertical depth of the charcoal adsorber is 4 inches.

6.5.2.1/6-49/2/3 The efficiency is 99, not 95, percent.

6.5.2.1/6-49/2/4 The charcoal bed is 4 inches deep.

6.5.2/6-49/6/All This paragraph describes filtering under DBA conditions; normal operation exhausts through the Reactor Building Filtered Exhaust System.

6.7/6-51/5/1 Designed is misspelled.

7.1.3/7-3/6/All Susquehanna states in FSAR 7.1.2a.3.3.6 that NEDO 10466 A describes a typical PGCC; NEDO 10466 A states in 6.0 that for actual plant differences see their respective FSARs. SSES states in their response to Question 32.42 that the design predates Regulatory Guide 1.75. SSES PGCC is NOT committed to Regulatory Guide 1.75 as stated. The NSSS separation criteria is as stated in Sections 3.13, 7.1, 7.2 and 7.3.

7.1.3/7-4/1/13 Re Item (7): Discussion on page 7-27 states that this system is designed in accordance with all requirements of the RPS. Why is it listed here as non-safety grade? Equipment in Section 7.6 is required for safety.

7.4.2/7-13/4/All PL has committed to automatic switchover. FSAR , Question 32.39 and NUREG 0737 address this.

7.5.1/7-16/4/1 Re our safety related display: We make no such claim, and the FSAR does not say this.

7.5.2/7-17/1/A11 Post accident monitoring was addressed in FSAR Questions 32.27 and 32.44.

7.5.2/7-17/1/4 "And oxygen" should be deleted.

7.7.2/7-19/6/2 This should read "Two additional processors".

7.7.2/7-20/-/1 This should read "Two other processors".

7.7.2/7-20/ /8 Change 24 to 32.

7.7.2/7-20/2/3 The sentence regarding safety-related/non safety-related functions for the plant processors is inconsistent. It states that none of the processors perform any safety-related functions and then describes the RWM feature, which is safety-related. Delete this description since it is discussed in Section 7.6.

7.7.2/7-22/7/7, The sentence beginning "The applicants ... refueling." is not true. Monitoring is required by the Technical Specifications: 2 source range monitors are required to be reading 1/2 cps.

7.7.2/7-23/-/1 The sentence beginning "This logic ..." and following sentence are in conflict with the Technical Specifications. This is only done for the initial fuel loading, not for refueling operations, according to SSES Technical Specifications which should be changed accordingly (p. 3/4 9-3).

8.3.1/8-6/2/11 The transfer preference scheme, giving preference to a slow transfer at the 13kV bus before initiating a transfer at the 4kV bus, has been deleted. The scheme is now designed to force a transfer at the 4kV bus simultaneously with a slow transfer at the 13kV level on loss of one offsite power supply. This change was made to eliminate the problem of reaccelerating 4kV motor loads, any number of which could be running at the time of startup transfer. Forcing a 4kV bus slow transfer sheds the motor loads from the bus, eliminating the combined effects of several motor inrush currents. There is no certainty that the remaining startup bus could have reaccelerated the connected 4kV motor loads for a startup bus slow transfer under the old scheme.

8.3.2/8-10/A11/ This section states an NRC interpretation of DC monitoring required by IEEE 308, 1974 and

Regulatory Guide 1.47. Attached are pages taken from IEEE 308, 1974, for clarity of requirements.

Susquehanna has fully complied with the design requirements embodied in IEEE 308, 1974 and Regulatory Guide 1.47 for DC system monitoring. In neither the IEEE standard nor Regulatory Guide 1.47 is the requirement to install the specific equipment in the Control Room, as the NRC states. Susquehanna's design has followed a logical approach in this monitoring scheme as well as in many others. For a system in which the operator has been provided no remote control and must send an operator to take local control, a general trouble alarm has been provided in the control room. Upon receiving a group trouble alarm, the operator will send someone to the DC room to decipher the problem and to take corrective actions. This scheme is in full compliance with the referenced standards.

In addition to complying with our commitments, the scheme contributes to the overall goal of minimizing unnecessary equipment and annunciation in the control room. This is an important goal of human factors engineering.

To augment the DC system monitoring, PL's operating staff currently plans to check the operational readiness of the DC system by local visits and recording vital data every 8-hour shift. This scheme provides the same level of surveillance to assure DC system availability as would an indication scheme applied in the control room.

We do agree that the additional trouble alarms cited in this section merit a review for implementation. It should be noted that this NRC interpretation of the IEEE requirement is not stated in any Regulatory Guide to our knowledge and has not been brought to our attention by the NRC prior to the writing of our SER. In summary, Susquehanna's DC surveillance complies with the requirements of the IEEE 308-1974 standard and Regulatory Guide 1.47. In addition, it fully meets the intent of the NRC's requirements stated in the SER and contributes to human factors engineering goals. For these reasons, we do not accept the imposition of the NRC's requirements in this section. PL recommends that the NRC position be modified to reflect IEEE 308-1974 requirements as well as Regulatory Guide 1.47.

the operator to select the most suitable distribution path from the power supply to the load.

**5.2.6 Test Provisions.** Means shall be provided to start and test-load the standby generators while the station is operating.

### 5.3 Direct-Current Systems.

**5.3.1 General.** The direct-current power system shall include power supplies, a distribution system, and load groups arranged to provide direct-current electric power to the Class IE direct-current loads and for control and switching of the Class IE power systems. Sufficient physical separation, electrical isolation, and redundancy shall be provided to prevent the occurrence of common failure modes in the station's Class IE power systems. Design requirements shall include the following:

(1) *Redundant Loads.* The electric loads shall be separated into two or more redundant load groups.

(2) *Safety Actions.* The safety actions by each group of loads shall be redundant and independent of the safety actions provided by its redundant counterparts.

(3) *Power Supplies.* Each of the redundant load groups shall have access to a power supply that consists of a battery and one or more battery chargers.

(4) *Common Power Supply.* Two or more load groups may have a common power supply if the consequences of the loss of the common power supply to the load groups under design basis conditions are acceptable.

(5) *Common Failure Mode.* The batteries shall not have a common failure mode for any design basis event.

(6) *Protective Devices.* Protective devices shall be provided to limit the degradation of the Class IE power systems. Sufficient indication shall be provided to identify the actuation of a protective device.

#### 5.3.2 Distribution System.

(1) *Description.* The distribution system shall consist of all equipment in the distribution circuits from their supply devices to the loads.

(2) *Capability.* Each distribution circuit shall be capable of transmitting sufficient energy to start and operate all required loads in that circuit.

(3) *Independence.* Distribution circuits to redundant equipment shall be physically and electrically independent of each other.

(4) *Surveillance.* The distribution system shall be monitored to the extent that it is shown to be ready to perform its intended function.

(5) *Auxiliary Devices.* Auxiliary devices that are required to operate dependent equipment shall be supplied from a related bus section to prevent the loss of electric power in one load group from causing the loss of equipment in another load group.

(6) *Feeders.* Feeders between the Class IE power systems located in Safety Class structures and systems located in non-Safety Class structures shall be provided with automatic circuit interrupting devices located in the Safety Class structures.

#### 5.3.3 Battery Supply.

(1) *Description.* Each battery supply shall consist of the storage cells, connectors, and its connections to the distribution system supply circuit breaker.

(2) *Capability.* Each battery supply shall be capable of starting and operating all required loads.

(3) *Availability.* Each battery supply shall be immediately available during normal operations and following the loss of power from the alternating-current system.

(4) *Independence.* Each battery supply shall be independent of other battery supplies.

(5) *Surveillance.* Indicators shall be provided to monitor the status of the battery supply.

(6) *Stored Energy.* Batteries shall be maintained in a fully charged condition. Stored energy shall be sufficient to operate all necessary circuit breakers and to provide an adequate source of power for all required connected loads for as long as each may be required during a loss of alternating-current power to the battery chargers.

#### 5.3.4 Battery Charger Supply.

(1) *Description.* Each battery charger supply shall include all equipment from its connection to the alternating-current system to its distribution system's supply circuit breaker.

(2) *Function.* Each battery charger supply shall furnish electric energy for the steady-state operation of connected loads required during normal and post-accident operation while its battery is returned to or maintained in a fully charged state.

(3) *Capability*. Each battery charger supply shall have sufficient capacity to restore the battery from the design minimum charge to its fully charged state while supplying normal and post-accident steady-state loads.

(4) *Independence*. The battery charger supply shall be independent of other battery charger supplies.

(5) *Surveillance*. Indicators shall be provided to monitor the status of the battery charger supply. This instrumentation shall include indication of:

- (a) output voltage
- (b) output current
- (c) circuit breaker position

(6) *Disconnecting Means*. Each battery charger power supply shall have a disconnecting device in its alternating-current power incoming feeder and its direct-current power output circuit for isolating the charger.

(7) *Feedback Protection*. Each battery charger power supply shall be designed to prevent the alternating-current power supply from becoming a load on the battery due to a power feedback as the result of the loss of alternating-current power to the chargers.

5.3.5 *Performance Test Provisions*. Means shall be provided to determine the voltage time output current characteristic of the battery.

#### 5.4 Vital Instrumentation and Control Power Systems.

5.4.1 *General*. Dependable power supplies are required for the vital instrumentation and control systems of the unit(s) including:

- (1) Instrumentation and control for the reactor protection system
- (2) The engineered safety features instrumentation and control systems

5.4.2 *Design Requirements*. The diverse arrangements, special requirements, and complexity of these systems preclude a detailed delineation of their power supply requirements. However, power must be supplied to these systems in such a manner as to preserve their reliability, independence, and redundancy. Typically, one or more of the following may be required:

- (1) Two or more independent direct-current power supplies for control and instrumentation.
- (2) Two or more independent direct-current

power supplies for instrumentation that have special requirements regarding stability and freedom from noise.

(3) Two or more independent alternating-current power supplies having a degree of reliability and availability, compatible with the systems they serve.

To accomplish the above requirements, special power supplies may be required that are isolated from the alternating-current and direct-current power supplies used for the normal instrumentation and control of the unit(s).

## 6. Surveillance Requirements

6.1 *Preoperational Equipment Tests and Inspections*. These equipment tests and inspections shall be performed with all components installed. They shall demonstrate that:

- (1) All components are correct and are properly mounted.
- (2) All connections are correct and that the circuits are continuous.
- (3) All components are operational.
- (4) All metering and protective devices are properly calibrated and adjusted.

6.2 *Preoperational System Test*. The preoperational system test shall be performed with all components installed. This test shall demonstrate that the equipment operates within design limits and that the system is operational and can meet its performance specifications. These tests shall demonstrate that:

- (1) The Class IE loads can operate on the preferred power supply.
- (2) The loss of the preferred power supply can be detected.
- (3) The standby power supply can be started and can accept design load within the design basis time.
- (4) The standby power supply is independent of the preferred power supply.

6.3 *Periodic Equipment Tests*. Tests shall be performed at scheduled intervals to:

- (1) Detect the deterioration of the equipment toward an unacceptable condition
- (2) Demonstrate that standby power equipment and other components that are not ex-

8.4.1/8-13/5/11 PL has stated exceptions to the 1-inch separation criterion in FSAR 3.12.3.3 (a & f).

8.4.2/8-16/1/11 The sentence "Two independent circuit ..." should be deleted. The two breakers are not used for fault current protection. Primary and backup protection are provided by the two lockout relays that trip the MG set feeder breaker and the generator field breaker in combination.

8.4.4/8-20/6/All Re Item (2): Our design does have the capability to reinstate the load shed feature if power is lost once the diesel generator is supplying the bus. Also, our degraded grid voltage protection will be bypassed once the diesel generator is supplying power to the 4kV bus.

9.1.1/9-1/7/2 This should read, "A minimum spacing", Change 7 to 6.535.

9.1.1/9-2/-/1 Change 12 to 11.875.

9.1.1/9-2/-/15 This should read "cover provides," not "cover is".

9.1.1/9-3/-/9 Change 120 to 80. Comment: We have 80 mil channels. Spent fuel pool criticality analysis was performed for 120 mils - this was conservative. We may also want to store unchanneled assemblies.

9.1.3/9-3/2/14 124 should be 125.

9.4.2/9-22/1/1 The Reactor Building recirculation system is needed only for LOCA in conjunction with SGTS to reduce the site boundary 2 hour dose. It should not be needed for long term or for fuel handling accidents.

9.5.1.1/9-18/3/All There is but one clarified water storage tank; there are two basins. This paragraph should be appropriately rewritten.

9.5.4.1/9-22/4/1 PL suggests that the first two lines of this paragraph be changed to read as follows: "The control room complex is not next to the radwaste building. It is separated from other areas by ..."

9.5.4.1/9-22/5/2 There is no smoke detection in the main control board.

9.5.4.3/9-23/2/1 These features are present in the Reactor Building, but not in the containment.



- 9.6.1/9-25/ /1 SSES has no evacuation alarm system as part of its communications systems. This section should be altered accordingly.
- 9.6.1/9-25/2/3 The reference to the paging channel is not true. Delete the sentence.
- 10.2/10-1/4/ SSES has three nominal plant exhaust pressures: 2.99, 3.56 and 4.43 inches mercury (absolute). This paragraph should be rewritten accordingly.
- 10.2/10-1/6/5 This should be "102 to 105 percent".
- 10.2/10-1/6/6 "and upon" should be changed to "or", and the words "will trip the turbine" added at the end of the sentence after "channels".
- 10.2/10-1/6/9 The 10 second interval should be rewritten to reflect a range of .10 to .20 seconds, dependent on steam flow percentage.
- 10.2/10-1/6/10 The control valves close in 0.08 seconds.
- 10.2/10-2/1/3 Reference to testing of the overspeed trip device is improper here; delete this phrase.
- 10.2/10-2/1/12 Item (14) should be rewritten as "Main shaft oil pump low pressure trip,"
- 10.2/10-2/1/14 Tripping the turbine causes an automatic scram for reactor power greater than 30%.
- 10.2/10-2/2/6 The ISI program does not provide for observation of the main steam stop and control valves. Reheat stop and intercept valves should not be included here.
- 10.2.1/10-3/3/1 Delete "were"; between basis and the period, insert: "for water quenched Ni-Cr-Mo-V material at the sizes and strength levels used".
- 10.2.1/10-3/4/5 Between regions and the period, insert: ", all other finish machined surfaces are subjected to a magnetic particle examination".
- 10.3.1/10-4/2/All Our FSAR description for Main Steam goes from outermost containment isolation valve to but not including turbine stop valves and therefore includes no safety related portion. The SER describes main steam supply from reactor to turbine and states 10.3.1 evaluates the safety related portion (reactor to outer isolation valve).

10.4.2.1/10-7/5/23 Change first low steam to low dilution steam; delete second low steam, replace "the operating" with all; change ejector to ejectors; replace the rest of the sentence (after ejectors) with "are isolated".

10.4.4/10-9/ /3 Generator should be generation.

10.4.4/10-9/1/10 Closed should be open.

11.2.2/11-9/5/8 This should read "steam jet condenser".

11.3/11-15/2/5 Not all discharges are terminated as this indicates; only those per the Standard Review Plan.

12.3/12-7/2/All This paragraph is not true. We requested an exemption in our Part 70 License Application as permitted by 10CFR 70.24(d).

12.3/12-7/3/6,7,11 & 12 These statements imply fixed monitors. Portable monitors will be used by the Plant Staff. The NRC is probably referring to the CAMs described in FSAR Section 12.5.2.6.3.1. These units are on wheels and can be moved. There are no fixed monitors.

12.5/12-9/1/1 This statement is not in the FSAR; temporary plant personnel (except clerks) in controlled areas only is the way this should read.

13.1.1/13-3/ / Item 1, 1st paragraph, 1st line: "Mr. Norman W. Curtis"  
2nd line: This should read "of the Susquehanna"  
Item 2, line 11: Nuclear Operations is not a "support" organization at PL.

13.1.1/13-7/ / Paragraph 5: The Manager of Nuclear Fuels is also responsible for fuel-related transient and accident analyses.

13.1.2/13-11/ / Item 2, 1st paragraph, last line should read "Lead Shift Technical Advisor".

15/15-1/1/10 PL suggests a discussion on infrequent events (referred to as "abnormal operational transients" in the FSAR) after the sentence ending with "guidelines". These events do not have to meet 10CFR20, nor do they meet a "no fuel damage" criteria.

15.2.1/15-7/2/5 Should (3) be (2) or is (2) missing?

15.3.4/15-16/4/1 15.2 should be 15.1.



15.4.3/15-24/2/Last	1.07 should be 1.06.
17.2/17-1/3/2	After "Operations" the words "and the Vice President - Engineering and Construction - Nuclear" should be added.
17.2/17-1/3/12, 13	These lines should read: "Reporting to the Manager - Nuclear Quality Assurance through the Assistant Manager - Nuclear Quality Assurance (Operations), are onsite.."
Fig. 17.1, p. 17-4	This figure is incorrect.
I.A.1.1/22-3/2/1	The STA's will hold a bachelor's degree or its equivalent.
I.A.1.1/22-3/3/2	The STA's are from Susquehanna, not Sumner.
I.A.2.1/22-10/5/5	NDI-QA-4.2.1
I.A.2.3/22-11/6/2	NDI-QA-4.1.4
I.A.2.3/22-11/6/	All instructors have passed the exam.
I.B.1.2/22-14/Last Line	This item is closed.
I.D.1/22-25/1/1	The "Direct Control System" should be the "Display Control System".
I.D.1/22-25/4/All	The key switch feature pertains only to PMS, however, the statement can be made that the operator has no access to stored algorithms in DCS.
II.B.1/22-28/2/3	There are six valves comprising the ADS, not seven.
II.B.1/22-28/2/9	This reference to current usage of temperature sensors to indicate valve position gives the wrong impression. PL has committed to using an acoustical monitoring system to perform this function.
II.B.1/22-28/5/All	This paragraph on a post-LOCA condition is not applicable to SSES; it should be deleted.
II.B.1/22-29/2/6	Residual heat removal heat exchanger vents do not apply to SSES.
II.B.2/22-23/2/1	The residual heat removal system should be included here as a post-accident system.
II.B.8/22-41/2/6	Delete the LaSalle reference.

II.D.1/22-44/3/8 The reference to an inconsistency with NUREG-0737 is not correct. PL is committed to NUREG-0737.

II.E.4.2/22-49/ / List all seven parts of the requirement.

II.E.4.2/22-50/ / Item (7), last line: hours should be days.

Under the Discussion and Conclusions, either delete the references to Table II.E.4.2.-1 or include FSAR Table 6.2-12, in order to provide more complete information. Also, the "two or more" signal reference is misleading. The "Z" signal code is one signal but it is diverse.

II.E.4.2/22-53/(a)(ii) Valves HV-15703 and 15704 do not belong here.

II.E.4.2/22-53/(b)(i) Lines to the recirculation pump seals do not have remote manual valves.

II.E.4.2/22-54/(3) There are no automatic isolation valves on instrument lines.

II.E.4.2/22-54/(5) PL finds this section to be an inaccurate. Valves HV-15704, HV-15714, HV-15721, HV-15722, HV-15723, HV-15724 and HV-15725 will be locked shut during conditions 1, 2, and 3 and verified by technical specifications. References to condition 4 should be deleted (i.e., hot shutdown). Valves HV-15705 and HV-15711 meet the operability criteria set forth in BTP CSB 6-4 and are not locked shut. Valves HV-15703 and HV-15713 are upstream of locked closed valves and do not need to be locked. We have committed to qualify all 11 valves. It should be noted that all of these valves will isolate on a LOCA signal.

Att.5/22-70 The fifth line under Discussion and Conclusions should read 2% rather than 3%.

Att.6/22-71 Under Discussion and Conclusions: Line 1: the hydrogen indication will be continuous and redundant. Line 4: 3% should be 2%.

II.K.1/22-87 This discussion states that the BWROG recommended providing an auto restart for HPCI. This is not true; they recommended it for HPCS. This recommendation applies only to BWR-5's and BWR-6's. The HPCI at SSES presently has this feature. The second paragraph should be modified accordingly.

III.D/22-103 The fourth listed system should read: "High Pressure Coolant Injection".

App. F/F-4

Item 1f: PL has agreed to obtain a new computer audible alarm chime, however at no time did PL state that it would have the same intensity as the alarm sound in item 1e.

App. F/F-7

Item 5d, next to last line: "aid" should be deleted.

App. F/F-8

Item 5h: Switches will be provided which will prevent accidental actuation.

Item 5i: PL has not committed to "install meters that are adjacent". This panel section is being redone by Bechtel in order to address other TMI concerns. Appropriately "grouped" indicators will be provided.

Item 5k: This should read: "meters with the most appropriate scales will be provided"; the need for 0 to +15 psig has never been established for our design.

sjb/S-7