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ACCESSION NBR: 9509070111 DOC. DATE: 95/06/23 NOTARIZED: NO DOCKET #
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 50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylv 05000388
 AUTH. NAME AUTHOR AFFILIATION
 PRICE, A.M. Pennsylvania Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 KEMIG, R. Region 1 (Post 820201)

see RPT

SUBJECT: Forwards exercise manual for Susquehanna Electric Station
1995 NRC observed exercise for review.

DISTRIBUTION CODE: IE35D COPIES RECEIVED: LTR 1 ENCL 2 SIZE: 14235
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**PENNSYLVANIA POWER & LIGHT COMPANY
EMERGENCY OPERATIONS FACILITY**

R.R. #1, BOX 1646, BERWICK, PA 18603-9989
Telephone: 717-542-3300

June 23, 1995


Attention: Mr. R. Kemig
U. S. Nuclear Regulatory Commission Region I
Emergency Preparedness Section
Division of Radiation Safety and Safeguards
475 Allendale Road
King of Prussia, PA 19406

Dear Mr. Kemig:

Three copies of the exercise manual for the Susquehanna Steam Electric Station 1995
NRC Observed Exercise are enclosed for your review.

If you have any questions or concerns please contact me, or Russ Halm at (717)
542-3603.

Sincerely,



Anthony M. Price
Supervisor-Nuclear Emergency Planning

rh:mm

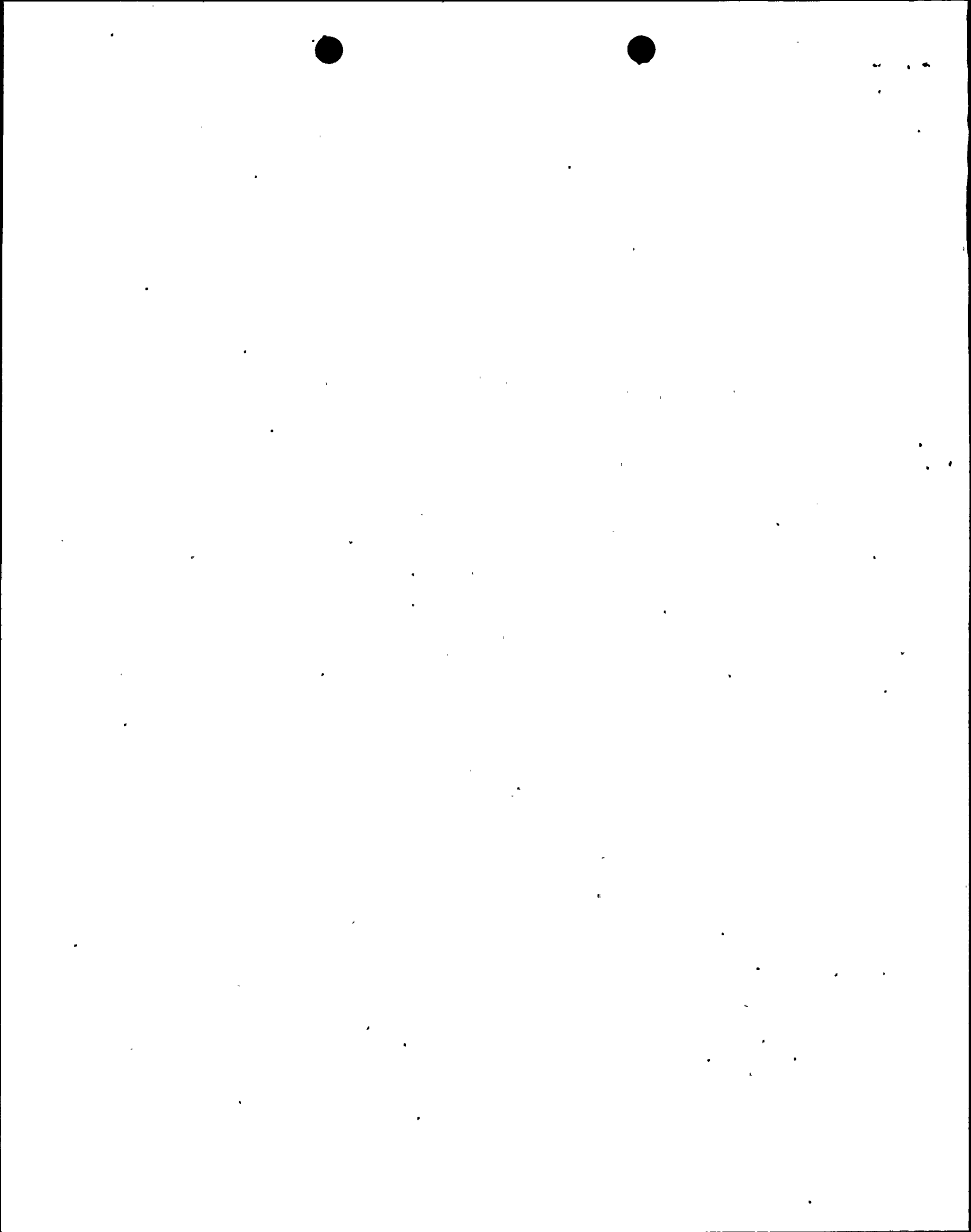
Enclosures (3)

cc: NRC Resident Inspectors



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PRIORITY 1

(ACCELERATED RIDS PROCESSING)

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9508150089 DOC. DATE: 95/08/11 NOTARIZED: YES DOCKET #
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 AUTH. NAME AUTHOR AFFILIATION
 BYRAM, R.G. Pennsylvania Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Informs of proposed changes to TS for plant, which implemented provisions of GL 86-10 re relocation of fire protection program from TS to another controlled document following guidance of GL 88-12.

DISTRIBUTION CODE: A001D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 7+60
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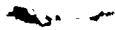
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Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

Robert G. Byram
Senior Vice President-Nuclear
610/774-7502
Fax: 610/774-5019

AUG 11 1995

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

**SUSQUEHANNA STEAM ELECTRIC STATION
PROPOSED AMENDMENT NO. 189 TO LICENSE NPF-14 AND
PROPOSED AMENDMENT NO. 146 TO LICENSE NPF-22:
REMOVAL OF FIRE PROTECTION REQUIREMENTS
FROM TECHNICAL SPECIFICATIONS
PLA-4352**

Docket Nos. 50-387/NPF-14
and 50-388/NPF-22

FILES R41-2/A17-2

The purpose of this letter is to propose changes to Technical Specifications for Susquehanna Steam Electric Station (SSES), Units 1 and 2, which implement the provisions of Generic Letter 86-10 related to the relocation of the plant's Fire Protection Program from the technical specifications to another controlled document (Technical Requirements Program) following the guidance of Generic Letter 88-12.

An assessment is attached which discusses the safety basis for this proposed change and concludes that the change involves no significant hazards. The change has been reviewed by the Plant Operations Review Committee and the Susquehanna Review Committee. The proposed change meets the Cost Beneficial Licensing Action criteria as outlined in NRC Administrative Letter 95-02. The NRC previously approved a proposed change of similar nature in a SER dated February 1, 1995 for Connecticut Yankee Atomic Power Company's Haddam Neck Station.

Attachment 1 presents the marked-up copy of the affected Technical Specifications.

We request issuance of the proposed amendments at your earliest convenience with the amendments effective as of the date of issuance, to be implemented within 60 days of issuance.

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

Very truly yours,

R. G. Byram

Attachment

150003

Aool
1/1

9508150089 950811
PDR ADOCK 05000387
P PDR

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

SAFETY ASSESSMENT

REMOVAL OF FIRE PROTECTION REQUIREMENTS FROM TECHNICAL SPECIFICATIONS

Background

The standard fire protection license condition suggested by Generic Letter 86-10 has been included in the Susquehanna SES Units 1 and 2 facility operating licenses as conditions 2.c.(6) for Unit 1 and 2.c.(3) for Unit 2. These conditions preclude changes to the approved Fire Protection Program without prior Commission approval if those changes would adversely affect the ability to achieve and maintain safe shutdown conditions in the event of a fire.

The proposed change specifically addresses relocation of Fire Protection requirements from the Technical Specifications to the Technical Requirements Program. The Susquehanna Technical Requirements Program is being established to provide the means for controlling those plant operating conditions deemed important to safe and efficient operation of the plant but not directly concerned with Design Bases Accident (DBA) prevention or mitigation. The program will cover systems and components that are a part of the licensing basis, as described in the FSAR, but do not meet the criteria of the NRC policy statement for inclusion in the Technical Specifications. Technical Requirements established by this program are commitments to control important plant equipment and operating conditions not controlled elsewhere. These requirements are derived from former Technical Specifications, FSAR commitments and other operational related requirements. Adherence to the requirements, actions, and testing requirements in the Technical Requirements Program is mandatory. The Vice President-Nuclear Operations is responsible for ensuring compliance with Technical Requirements throughout the plant organization.

In addition, the proposed change revises Technical Specifications to include the requirement for a program and procedure to implement the Technical Requirements Program, and also revises Technical Specifications to add the requirement for the Plant Operations Review Committee to review all proposed changes to the Technical Requirements Program and to forward copies of reviewed changes to the Susquehanna Review Committee (6.5.1.6n).

The proposed change will not affect the substance of the Fire Protection Program, system operability requirements, compensatory (remedial) actions, surveillance requirements, system bases, or fire brigade staffing.

Description of the Changes

In accordance with Generic Letter 86-10, Technical Specification provisions related to the Fire Protection Program are being relocated from Technical Specifications to another controlled document, the Susquehanna Technical Requirements Manual. Future changes to the Technical Requirements Manual will be subject to the requirements of 10CFR50.59. Further, changes to Technical Specification Section 6 (Administrative Controls) to include review of changes to the Technical Requirements Program, provide that any changes to the Fire Protection Program and

implementing procedures are reviewed by the Plant Operations Review Committee (PORC). The Susquehanna Technical Requirements Manual is a PP&L initiative which ensures that fire protection limiting conditions for operation, surveillance requirements, and their bases are adequately controlled and maintained following their relocation from Technical Specifications.

The following changes are proposed to be made to Technical Specifications:

Technical Specifications 3.3.7.9, Fire Detection Instrumentation; 3.7.6, Fire Suppression Systems; and 3.7.7, Fire Rated Assemblies with their associated Bases, will be relocated in their entirety to the Technical Requirements Manual.

Technical Specification 6.2.2e relating to the site Fire Brigade will be relocated into the Technical Requirements Manual.

Three additions will be made to Technical Specification Section 6.0. Technical Specification 6.5.1.6n will be added to include PORC review of all proposed changes to the Technical Requirements Program and submittal of all approved changes to the Susquehanna Review Committee. Technical Specification 6.8.1j will be added to include the requirement to establish, implement, and maintain written procedures for the implementation of the Technical Requirements Program. Technical Specification 6.8.2 will be changed to add the requirement for the Vice President-Nuclear Operations to review the procedure implementing the Technical Requirements Program in accordance with Specification 6.5.1.6 or 6.5.3, and approve prior to implementation and periodically as set forth in administrative procedures.

Safety Analysis

The proposed change recognizes the Technical Requirements Program. The Technical Requirements Program is a commitment to control important plant equipment and operating conditions not controlled elsewhere. The operating restrictions and testing included in the Technical Requirements Program and procedures for the Fire Protection requirements being relocated are equivalent to those which were in Technical Specifications. Fire protection features necessary to satisfy the fire protection guidelines and requirements of Appendix A to BTP APCS 9.5-1 and Paragraphs III G, J, O, and L of Appendix R to 10 CFR Part 50 previously committed to for Susquehanna SES have not been changed in conjunction with their removal from Technical Specifications and the scope of fire protection features receiving surveillance has not been reduced. Plant procedures will continue to provide the specific instructions necessary for the implementation of the specific requirements, just as when the requirements resided in the Technical Specifications. Fire Protection Program commitments, reporting requirements and amendments will by this process be transferred from the jurisdiction of 10 CFR 50.73 and 10 CFR 50.90 to 10 CFR 50.59. All changes to the Fire Protection Review Report are provided to the NRC for their review. Additionally, Susquehanna SES, Units 1 and 2, License Conditions require compliance with the provisions of the fire protection program as described in the Fire Protection Review Report which ensures enforcement of the fire protection requirements. The proposed changes are in accordance with the guidance provided in Generic Letter 86-10 "Implementation of Fire Protection Requirements" dated April 24, 1986, and Generic Letter 88-12, "Removal of Fire Protection

Requirements from Technical Specifications," dated August 2, 1988 with the exception that the Technical Requirements Manual rather than the FSAR will contain fire protection related operational conditions, remedial actions, and test requirements. Use of the Technical Requirements Program and its associated manual provides a more visible control mechanism for the Fire Protection Program elements.

Provisions for review of future changes to Technical Requirements are dictated by the changes to Technical Specification 6.5.1.6n. The Plant Operations Review Committee's responsibilities and authority are being revised to provide specific reference to the requirement to review the Technical Requirements Program and changes thereto. This change reinforces the importance of the Technical Requirements Program and the requirements controlled by it and assures a multi-discipline review by the Plant Operations Review Committee of proposed changes to those requirements that are removed from Technical Specifications and placed in the Technical Requirements Program. All new Technical Requirements, and any proposed changes that directly affect the Requirement, Applicability, Testing Requirements, or Action sections of an existing Technical Requirement will be submitted to the Susquehanna Review Committee for information. All new and proposed changes to Technical Requirements will be reviewed by Licensing and Operations.

The proposed change deletes Unit 1 and Unit 2 Technical Specifications 3/4.3.7.9 (Fire Detection Instrumentation), 3/4.7.6 (Fire Suppression Systems) and 3/4.7.7 (Fire Rated Assemblies) and the corresponding section 3/4 Bases and revises Technical Specification 6.5.1.6n in accordance with the annotated pages provided as Attachments 1 and 2.

The requirements of Technical Specifications 3/4.3.7.9, 3/4.7.6 and 3/4.7.7 have been moved in their entirety to the Susquehanna SES Technical Requirements Program. Additionally, the requirements for the Fire Brigade found in Technical Specification 6.2.2e have also been moved to the Technical Requirements Program. These changes are administrative in nature in that no requirements are being altered.

Technical Specification 6.8, Procedures and Programs, is revised to include the Technical Requirements Program implementation. This change reinforces the importance of the Technical Requirements Program and is consistent with the requirements established for similar programs.

Pursuant to the above, this proposed change does not adversely affect the safe operation of Susquehanna SES.

NO SIGNIFICANT HAZARDS CONSIDERATIONS

The proposed changes do not:

- 1. *Involve a significant increase in the probability or consequences of an accident previously evaluated.***

The proposed change relocates the provisions of the Fire Protection Program that are contained in the Technical Specifications and places them in the Technical Requirements Manual. No requirements are being added or deleted. Review and approval of those portions of the Fire Protection Program contained in the Technical Requirements Manual and revisions thereto will be the responsibility of the Plant Operations Review Committee just as it was their responsibility to review changes to the fire protection Limiting Condition for Operation and Surveillance Requirements when they were part of the Technical Specifications. Approved Technical Requirements or changes thereto are provided to the Susquehanna Review Committee for information. No design basis accidents are affected by the change, nor are safety systems adversely affected by the change. Therefore, there is no impact on the probability of concurrence or the consequences of any design basis accidents.

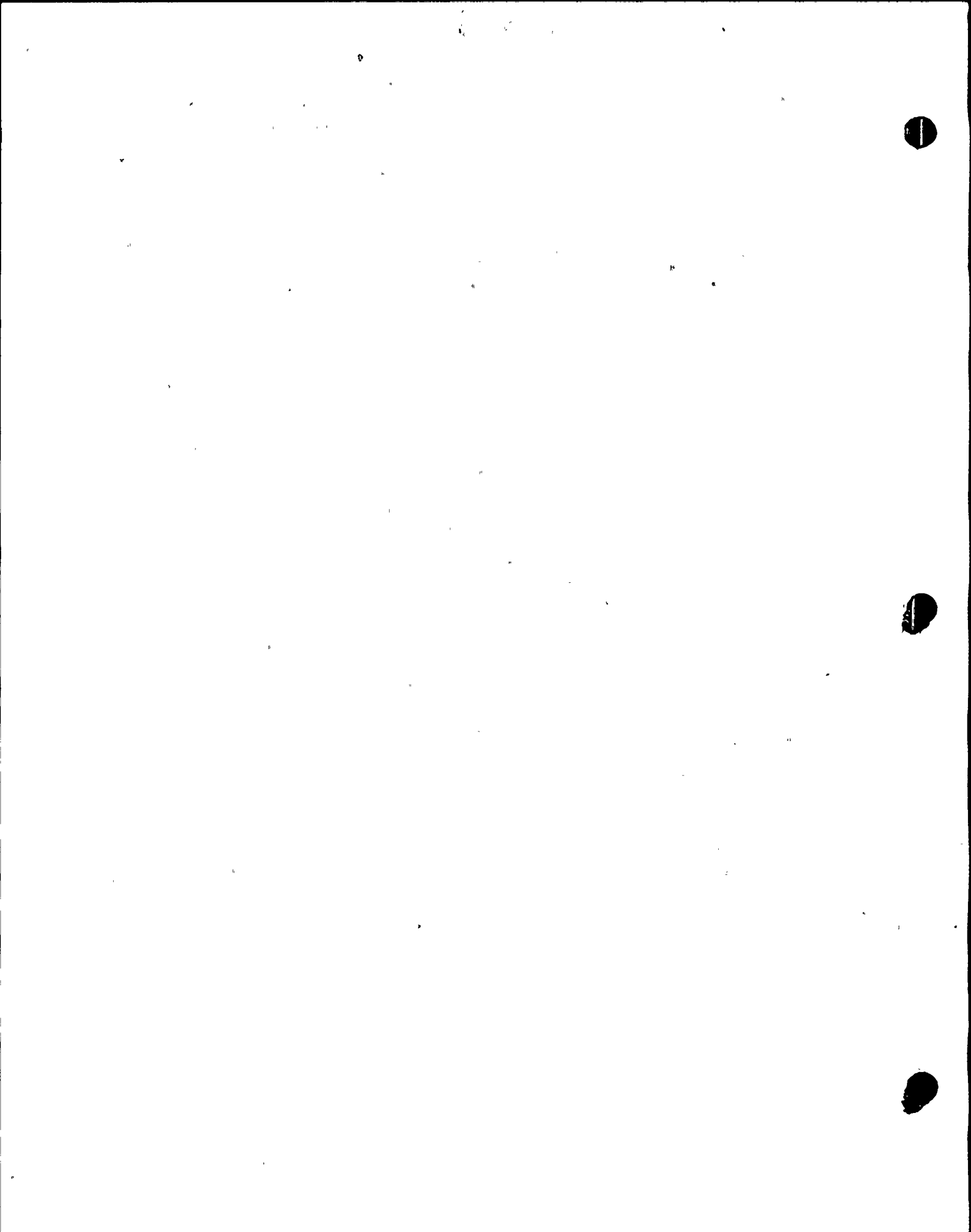
- 2. *Create the possibility of a new or different kind of accident from any previously evaluated.***

The proposed changes relocate the provisions of the Fire Protection Program that are contained in the Technical Specifications and places them in the Technical Requirements Manual. No requirements are being added or deleted by the Technical Requirements Manual. There are no new failure modes associated with the proposed changes. Therefore, since the plant will continue to operate as designed, the proposed changes will not modify the plant response to an accident.

- 3. *Involve a significant reduction in a margin of safety.***

No change is being proposed for the Fire Protection Program requirements themselves. The relevant Technical Specifications are being relocated, and the requirements contained therein are being incorporated into the Technical Requirements Manual. Plant procedures will continue to provide the specific instructions necessary for the implementation of the requirements, just as when the requirements resided in the Technical Specifications. Fire Protection Program changes will be subject to the provisions of 10CFR50.59 and the current fire protection license condition. As such, the changes do not directly affect any protective boundaries nor does it impact the safety limits for the boundary. Thus, there are no adverse impacts on the protective boundaries, safety limits, or margin of safety.

Since operability and surveillance requirements will remain in a controlled document, the changes do not reduce the effectiveness of Technical Specification requirements. Any changes to the Fire Protection Program requirements will be made in accordance with the provisions of 10CFR50.59 and the fire protection license condition.



ENVIRONMENTAL CONSIDERATIONS

We have reviewed the proposed license amendment against the criteria of 10CFR51.22 for environmental considerations. The proposed changes do not increase the type and amounts of effluents that may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, we have concluded that the proposed changes satisfy the criteria delineated in 10CFR51.22(c)(9) for a categorical exclusion from the requirements for an environmental impact statement.

