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SUBJECT: Forwards Proposed Amends 177 & 131 to Licenses NPF-14 & NPF-22, respectively, incorporating administrative changes.

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U.S. Nuclear Regulatory Commission
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**SUSQUEHANNA STEAM ELECTRIC STATION
PROPOSED AMENDMENT NO. 177 TO
LICENSE NO. NPF-14 AND NO. 131 TO
LICENSE NO. NPF-22 : ADMINISTRATIVE CHANGES
PLA-4215**

FILES A17-2/R41-2

Docket Nos. 50-387
and 50-388

Dear Sir:

The purpose of this letter is to propose changes to the Susquehanna SES Units 1 & 2 Technical Specifications. The following changes, which are illustrated on the attached marked-up Technical Specification pages, are proposed for both Unit 1 and Unit 2 Technical Specifications.:

- Change of title from Superintendent of Plant to Vice President-Nuclear Operations and Vice President-Nuclear Operations to Senior Vice President-Nuclear (for certain duties).
- Removal of footnotes that reference periods of time, dates, and events that have since past and are no longer applicable.
- Add a footnote to section 6.5.1.2 indicating the Station Duty Manager shall act as Plant Operations Review Committee (PORC) chairman in the absence of the Vice President-Nuclear Operations.
- Change of Semiannual Radioactive Effluent Release Report to Annual Radioactive Effluent Release Report in Table 4.11.2.1.2-1 footnote g.

The attached analysis discusses the safety basis for the proposed Technical Specification changes and concludes that the changes involve no significant hazards. The changes have been reviewed by the Plant Operations Review Committee (PORC) and the Susquehanna Review Committee (SRC).

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PP&L plans to incorporate these changes into the Technical Specifications upon NRC approval. Any questions regarding this request should be directed to Mr. A. K. Maron at (610) 774-7852.

Very truly yours,



R. G. Byram

Attachment

cc: NRC Region I
Mr. C. Poslusny, Jr., NRC Sr. Project Manager - OWFN
Ms. M. Banerjee, NRC Sr. Resident Inspector - SSES
Mr. W. P. Dornsife, PA DER



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SAFETY ASSESSMENT***ADMINISTRATIVE CHANGES***

BACKGROUND

Susquehanna SES (SSES) has changed the title of the positions of Superintendent of Plant to Vice President-Nuclear Operations and Vice President-Nuclear Operations to Senior Vice President-Nuclear (for certain duties). The latter assumes all duties and responsibilities of the former. These changes appear in several instances.

Footnotes that reference periods of time, dates, and events that have since past will be removed from the Technical Specifications since they are no longer applicable.

Current SSES Technical Specifications limit the role of the acting chairman of the Plant Operations Review Committee (PORC) in the absence of the Vice President-Nuclear Operations.

Changes made to Section 6.9.1.8, which changed reporting of the Radioactive Effluent Release Report from semi-annual to annual, were not reflected in Table 4.11.2.1.2-1 footnote g.

PP&L recognizes these changes need to be adequately reflected in the Technical Specifications.

DESCRIPTION OF CHANGES

The following changes, which are illustrated on the attached marked-up technical specification pages are proposed for both Unit 1 and Unit 2 Technical Specifications.:

- Change of title from Superintendent of Plant to Vice President-Nuclear Operations and Vice President-Nuclear Operations to Senior Vice President-Nuclear (for certain duties).
- Removal of footnotes that reference periods of time, dates, and events that have since past and are no longer applicable.
- Add a footnote to section 6.5.1.2 indicating the Station Duty Manager shall act as PORC chairman in the absence of the Vice President-Nuclear Operations.
- Change of Semiannual Radioactive Effluent Release Report to Annual Radioactive Effluent Release Report in Table 4.11.2.1.2-1 footnote g.

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SAFETY ANALYSIS

Analysis

Change of title from Superintendent of Plant to Vice President Nuclear Operations and Vice President-Nuclear Operations to Senior Vice President-Nuclear.

The proposed changes are administrative in nature and do not compromise the minimum qualifications or training required for these positions. Also, the changes do not affect the functions or responsibilities of those positions nor do the changes diminish an individual's ability to perform those functions and responsibilities. Therefore, the proposed changes do not impact the safe operation of Susquehanna SES.

Removal of footnotes that reference time frames and events that have since past and are no longer applicable.

The proposed removal of Technical Specification footnotes that reference periods of time, dates, and events that have since past is justified based on the fact that they are no longer applicable. At present, the footnotes clutter the page and require operators to perform unnecessary applicability reviews. Removing the footnotes decreases the potential for confusion and incorrect actions, thereby enhancing the safe operation of Susquehanna SES.

Adding footnote to section 6.5.1.2 indicating the Station Duty Manager shall act as PORC chairman in the absence of the Vice President-Nuclear Operations.

The proposed change will ensure that leadership of the PORC will continue in the absence of the Vice President-Nuclear Operations. This change will not impact the plant operation, but will enhance continued performance by ensuring a responsible individual is identified and available during all shifts.

Changing Table 4.11.2.1.2-1 footnote g which changes the Semiannual Radioactive Effluent Release Report to the Annual Radioactive Effluent Release Report.

The change from a Semiannual Radioactive Effluent Release Report to an Annual Radioactive Effluent Release Report was previously approved in Amendment 128 to Unit 1 and Amendment 97 to Unit 2. Incorporating this approved change into this footnote will maintain accuracy and consistency.

CONCLUSION

The change of titles from Superintendent of Plant to Vice President-Nuclear Operations and Vice President-Nuclear Operations to Sr. Vice President - Nuclear are administrative in nature and do not change the qualifications, functions or responsibilities of these positions.

Removal of Technical Specification footnotes that reference periods of time, dates, and events that have since past will reduce page clutter and eliminate unnecessary applicability reviews of those footnotes. Removal of the footnotes will also decrease the potential for confusion and incorrect actions thereby enhancing the safe operation of Susquehanna SES.

The change from a Semiannual to an Annual Radioactive Effluent Release Report was previously accepted in Amendment 128 to Unit 1 and Amendment 97 to Unit 2.

The addition indicating the Station Duty Manager as the acting PORC chairman in the Vice President-Nuclear Operations' absence accurately defines a responsible alternative to support continued performance of necessary duties.

NO SIGNIFICANT HAZARDS CONSIDERATIONS

- I. This proposal does not involve a significant increase in the probability or consequences of an accident previously evaluated.*

The proposal to change the title of Superintendent of Plant to Vice President-Nuclear Operations and Vice President-Nuclear Operations to Senior Vice President-Nuclear (for certain duties) is administrative in nature and does not compromise the minimum qualifications or training required for these positions. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change for the removal of footnotes that reference periods of time, dates, and events that have since past is justified based on the fact that they are no longer applicable. Because operators must perform unnecessary applicability reviews on these no longer applicable footnotes, removing the footnotes decreases the potential for confusion and incorrect actions. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change to add a footnote indicating the Station Duty Manager shall act as PORC chairman in the absence of the Vice President-Nuclear Operations will ensure continuous leadership of PORC and will enhance performance by ensuring a responsible individual is available during all shifts. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

Changing the Semiannual Radioactive Effluent Release Report to Annual Radioactive Effluent Release Report was previously approved in Amendment 128 to Unit 1 and Amendment 97 to Unit 2. Incorporating this change into footnote g of Table 4.11.2.1.2-1 will maintain accuracy and consistency. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

- II. This proposal does not create the possibility of a new or different kind of accident from any accident previously evaluated.*

The proposal to change the title of Superintendent of Plant to Vice President-Nuclear Operations and Vice President-Nuclear Operations to Senior Vice President-Nuclear (for certain duties) is administrative in nature and does not compromise the minimum qualifications or training required for these positions. Also, the change does not diminish the responsibilities or functions of these positions. Therefore, the proposed change does

not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change for the removal of footnotes that reference periods of time, dates, and events that have since past is justified based on the fact that they are no longer applicable. Because operators must perform unnecessary applicability reviews on them, removing the no longer applicable footnotes decreases the potential for confusion and incorrect actions, thereby enhancing the safe operation of Susquehanna SES. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change to add a footnote indicating the Station Duty Manager shall act as PORC chairman in the absence of the Vice President-Nuclear Operations will ensure continuous leadership of PORC and will enhance performance by ensuring a responsible individual is available during all shifts. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Changing Semiannual Radioactive Effluent Release Report to Annual Radioactive Effluent Release Report was previously approved in Amendment 128 to Unit 1 and Amendment 97 to Unit 2. Incorporating this change into footnote g of Table 4.11.2.1.2-1 will maintain accuracy and consistency. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

III. This change does not involve a significant reduction in a margin of safety.

For the reasons discussed in items I and II above, as well as the enclosed Safety Assessment, the proposed change does not involve a significant reduction in a margin of safety.

ENVIRONMENTAL CONSEQUENCES

The proposed Technical Specification changes are all administrative in nature, and will therefore have no impact on the environment.

IMPLEMENTATION

PP&L plans to incorporate these changes into the Technical Specifications upon NRC approval.