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SUBJECT: Requests waiver of compliance from TS 3.3.2 Action b for Table 3.3.2-1 trip function 4f in order to restore RWCU while RWCU isolation channel being restored to operable status.

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Mr. Thomas T. Martin, Administrator
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**SUSQUEHANNA STEAM ELECTRIC STATION
REQUEST FOR WAIVER OF COMPLIANCE:
INOPERABLE RWCU ISOLATION CHANNEL
PLA-3874 FILES A17-2/R41-2**

Docket No. 50-388

Dear Mr. Martin:

The purpose of this letter is to request a waiver of compliance from Technical Specification 3.3.2 (Isolation Actuation Instrumentation), Action b. Susquehanna SES Unit 2 entered this action at approximately 1120 hours on November 17, 1992, in order to investigate anomalous readings of the 'B' RWCU High Flow isolation channel. The channel was subsequently confirmed inoperable, and at approximately 1410 hours, the RWCU system was isolated in accordance with Table 3.3.2-1, Action 23.

REQUIREMENTS FOR WHICH WAIVER IS REQUESTED

Technical Specification 3.3.2, Action b, footnote *, requires that Action 23 of Table 3.3.2-1 be followed for the circumstances outlined above. This action required the RWCU system to be isolated. PP&L is requesting that the requirement to follow Action 23 be waived so that the RWCU system can be restored to service while the inoperable instrument channel is being repaired.

CIRCUMSTANCES REQUIRING PROMPT ACTION

Susquehanna SES Unit 2 is currently at approximately 50% rated thermal power after completing a refueling and inspection outage. Reactor Water conductivity was approximately 0.3 micromhos/cm when RWCU was isolated. PP&L is projecting that a reactor shutdown will have to commence at approximately 2200 hours on November 17, 1992, if the RWCU system is not restored to service. This projection is based on PP&L policy not to operate with high reactor conductivity. This policy is enforced by administrative controls on water

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chemistry which require power reduction to commence at 0.5 micromhos/cm.

SAFETY SIGNIFICANCE AND CONSEQUENCES OF PROPOSED REQUEST

This waiver requests that the RWCU system be restored to service for approximately 72 hours while the 'B' RWCU High Flow isolation instrument channel is being repaired. The cause of the instrument failure is unknown at this time. If approved, this action will avoid shutdown of SSES Unit 2.

PP&L believes that this request is safe due to the operability of the 'A' RWCU High Flow isolation instrument, as well as the other diverse and redundant RWCU line break detection logic required by Technical Specification 3.3.2. This includes (for two trip systems):

- . RWCU Delta Flow-High (1 channel per trip system, 1 out of 1 logic)
- . RWCU Area Temperature-High (3 channels per trip system, 1 out of 1 logic)
- . RWCU Area Ventilation Delta Temperature-High (3 channels per trip system, 1 out of 1 logic)
- . Reactor Vessel Water Level - Low Low, Level 2 (2 channels per trip system, 2 out of 2 logic)
- . Manual Isolation (1 channel per trip system, 1 out of 1 logic)

These instruments (including the other High Flow channel) cover the necessary range of potential pipe break scenarios. The temperature detection instruments are designed to detect and isolate leaks below the flow rate corresponding to critical crack size. The delta flow, flow, and Level 2 channels will detect and isolate increasingly larger breaks, up to and including a double-ended guillotine break. All of these channels except for Level 2 will detect leaks or breaks outside containment; the Level 2 channel detects breaks inside containment. Finally, the manual isolation provides a backup to allow the operator to effect the isolation in response to control room alarms if an automatic isolation does not occur.

Furthermore, extended isolation of RWCU will have detrimental effects on SSES water chemistry. For this reason, coupled with the unlikely event of a RWCU line break in the next 72 hours, it is requested that the NRC provide expedited approval of this waiver request.

COMPENSATORY ACTIONS

In support of this request, PP&L is taking the following compensatory actions:

1. Confirming OPERABILITY of all other RWCU isolation trip functions.
2. Reperforming calibration of the other RWCU High Flow isolation channel (A).
3. Expediting actions necessary to determine the cause of the inoperability and repair the inoperable channel, to minimize the time in the waiver condition.

JUSTIFICATION FOR DURATION OF REQUEST

Currently, PP&L has not determined why the inoperable RWCU high flow isolation channel failed. 72 hours is being proposed to support diagnosis and repair of the channel assuming that it can be repaired without containment entry. PP&L will keep the NRC Senior Resident Inspector informed of our progress.

NO SIGNIFICANT HAZARDS CONSIDERATIONS

1. This request does not involve a significant increase in the probability or consequences of an accident previously evaluated. In the proposed configuration, the trip function of High RWCU Flow has been rendered susceptible to a single failure of the operable channel. This configuration does not increase the probability of a RWCU line break, nor its consequences, since for the 72-hour period other diverse means of break detection are available.
2. This request does not create the possibility of a new or different kind of accident from any accident previously evaluated. The inoperability of the RWCU High Flow instrument channel can only impact the results of previously analyzed events. No design or operational changes are occurring that would create a new event requiring evaluation.
3. The proposed change does not involve a significant reduction in a margin of safety. The event of concern, a RWCU line break, is unlikely, especially over the 72-hour period requested. Furthermore, the redundant and diverse RWCU break detection logic that is operable will provide an adequate level of assurance that a break will be detected if it were to occur. Also, avoidance of a potentially unnecessary reactor

shutdown and the detrimental effects of prolonged RWCU isolation will have a positive safety impact.

ENVIRONMENTAL CONSEQUENCES

The impact of the inoperable RWCU isolation channel is mitigated by the short duration of this request and other break detection instrumentation. Therefore, no environmental consequences that have not been previously evaluated are anticipated.

CONCLUSION

Susquehanna SES Unit 2 is currently operating with the RWCU system isolated due to an inoperable isolation channel. A 72-hour waiver of compliance from Technical Specification 3.3.2, Action b. for Table 3.3.2-1 Trip Function 4f is requested in order to restore RWCU while the channel is being restored to operable status.

Any questions on this proposal should be directed to Mr. J.M. Kenny at (215) 774-7904.

Very truly yours;


H. W. Keiser

cc: ~~NRC Document Control Desk~~ (original)
Mr. C. L. Miller - NRC Project Director
Mr. R. J. Clark, NRC Sr. Project Manager
Mr. G. S. Barber, NRC Sr. Resident Inspector
Mr. W. P. Dornsife, PA DER