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 RECIPIENT AFFILIATION: Licensing Branch 1

SUBJECT: Responds to SER Outstanding Item 79. Test simulating loss of ac power condition for reactor & containment sys will be performed. Test may cause certain conditions inconsistent w/NRC requirements. Commitment closes open item.

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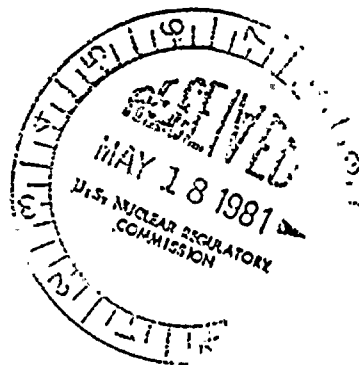
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NORMAN W. CURTIS
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821-5381

May 15, 1981



Mr. B. J. Youngblood, Chief
Licensing Branch No. 1
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION
OUTSTANDING ITEM NO. 79
ER 100450 FILE 841-2,-12 PLA-780

Docket Nos. 50-387
50-388

Dear Mr. Youngblood:

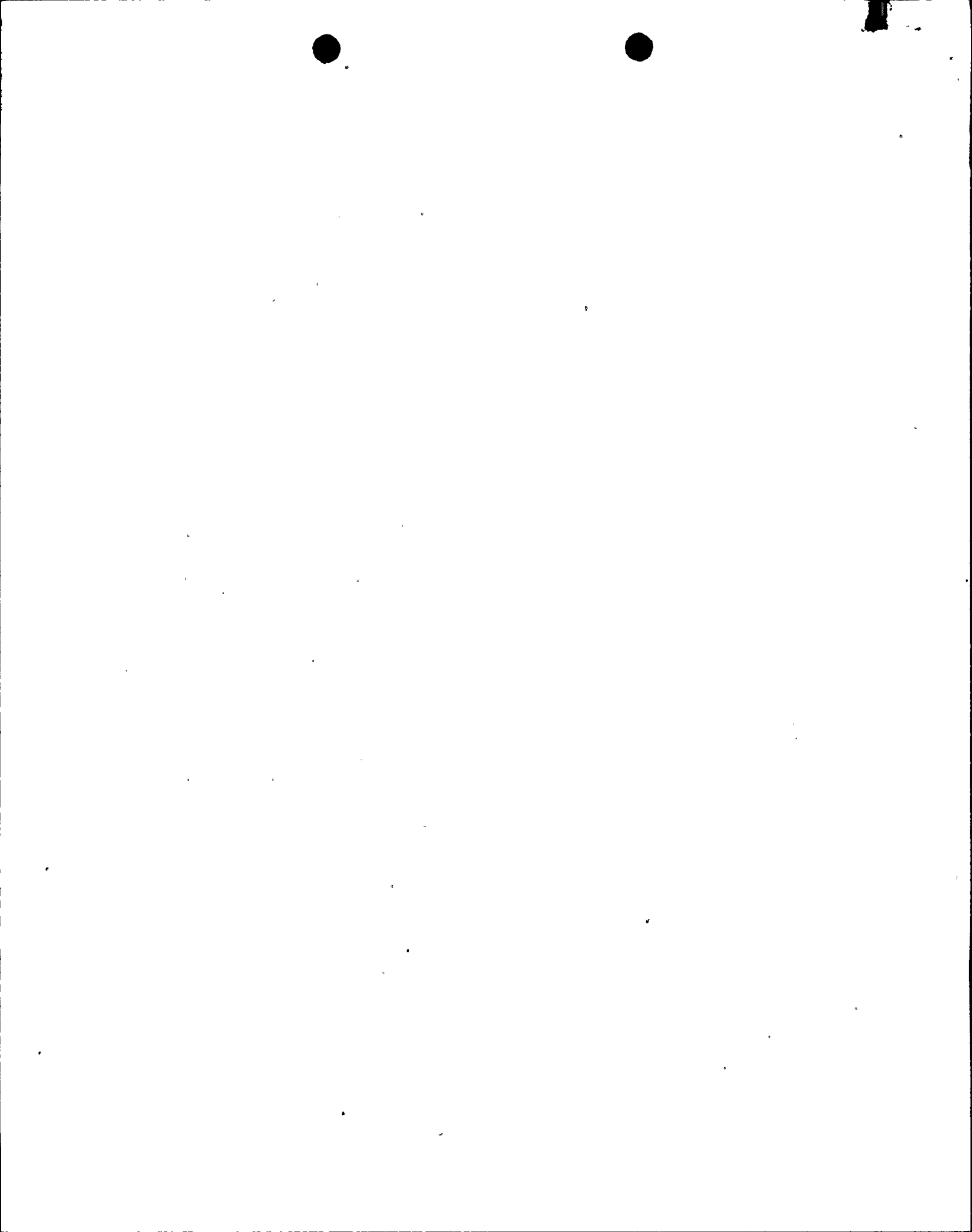
This letter is submitted in response to SER outstanding item no. 79. This commitment completes our action and will allow this open item to be closed.

SSES will conduct a test which simulates a loss of AC power condition for the reactor and containment systems. The purpose of this test will be to obtain data relative to the performance of these systems under the imposed condition of no AC power available for mitigation of transient effects. Several key factors associated with performance of this test include:

- (a) No blocking of low pressure ECCS functions will be provided. Transient conditions imposed by the test are not expected to initiate these systems on low water level. Adequate data will be obtained prior to injection of low pressure ECCS flow on a high drywell pressure signal in conjunction with a confirmatory low reactor pressure signal. If initiation points are reached earlier in the test, this would represent a criteria for test termination and the ECCS would be allowed to function as designed.
- (b) In most if not all cases, Limiting Conditions for Operation will not be violated. It is possible that as test plans are developed, certain LCO's will be identified as inhibiting test performance. However, for LCO's that are being approached as a result of transient effects during the test, this will represent criteria for test termination to insure plant safety.

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- (c) Loss of power to plant instrumentation will not be simulated. To accomplish the major goal of this test, instrumentation will be maintained functional for proper data collection. This constraint is also considered necessary to insure plant safety. Training of licensed operators in response to the loss of all station AC condition will be provided at PP&L's plant specific simulator. This will provide the opportunity to experience the instrumentation blackout condition without placing the plant in jeopardy.
- (d) Plant AC busses will remain energized, the emergency diesel generators will be available or operating, and breakers to safeguards equipment will not be racked out. These precautions are considered necessary for plant safety.
- (e) Test termination criteria will be established for parameters such as reactor vessel temperature limits, containment pressure and temperature, reactor vessel level, suppression pool temperature, HPCI and RCIC room temperatures, and CRD temperatures.

The test will be conducted at a convenient point during the first fuel cycle, with the constraint that adequate decay heat exists to provide a valid test. Several options are being explored for test initiation (e.g. turbine trip from 5% power following load reduction, turbine trip from 85% power, etc.) It is our position that the method finally selected will have little bearing on the test, since plant performance during the initial state of such transients is adequately tested in startup tests.

The commitments previously made in response to Item I.G.1 for additional testing and training will be fulfilled, as it is felt that valuable input will be obtained for the loss of AC power test.

The test may cause certain conditions which are inconsistent with NRC requirements. We therefore will provide NRC with the test plan and pertinent documents for review and approval. Performance of this test is contingent upon a favorable safety evaluation and obtaining appropriate commission approvals.

Since the NRC has indicated that they may not require a test at SSES if results from a test at another plant resolve their concerns, PP&L's commitment is contingent on a continuing NRC requirement for this test.

Very truly yours,



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

DPM/mks

cc: R. M. Stark