

**Pennsylvania Power & Light Company**

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DEC 14 1993

Director of Nuclear Reactor Regulation
Attention: Mr. C. L. Miller, Project Director
Project Directorate 1-2
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

**SUSQUEHANNA STEAM ELECTRIC STATION
REQUEST FOR TECH SPEC INTERPRETATION
PLA-4062** **FILES A17-2/R41-2**

Docket Nos. 50-387
and 50-388

Dear Mr. Miller:

Based on discussions with Mr. R.J. Clark of your staff, PP&L is documenting the following interpretation of the Susquehanna SES Unit 2 Technical Specifications, and requests your confirmation of its acceptability.

Currently, both SSES units are shutdown. Fuel reload of Unit 1 will be underway shortly, and we are preparing to install the committed water level modifications in Unit 2 due to a forced shutdown that occurred on December 11.

In order to install the Unit 2 modifications, the associated Unit 2 water level instrumentation (Level 2, ref. Technical Specification Table 3.3.2-1, Trip Function 2.a.) must be taken out of service. The Unit 2 Technical Specifications require this instrumentation to be OPERABLE under certain conditions, including while moving irradiated fuel in Secondary Containment.

The Technical Specifications do not clearly address the common SSES refueling floor. Unit 1 irradiated fuel will be moved in Secondary Containment in support of refueling that unit. Therefore, PP&L requests that NRR confirm an interpretation that recognizes that the Unit 2 Level instrumentation was not intended to be required OPERABLE on Unit 2 when Unit 1 irradiated fuel is being moved in Secondary Containment as long as the Unit 1 Water Level instrumentation is fully OPERABLE in accordance with the Technical Specifications.

For your information, no CORE ALTERATIONS or operations with the potential for draining the reactor vessel will be performed on Unit 2 while the water level instrumentation is out of service. Also, one trip system of Level 2 instrumentation will be maintained OPERABLE on Unit 2 while the modifications are being performed.

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Mr. C. L. Miller

PP&L has reviewed these requirements against the new Standard Technical Specifications (NUREG-1433), and have confirmed that the new Technical Specifications have appropriately deleted the requirement for the Level 2 water level instrumentation to be required OPERABLE when irradiated fuel is being moved in Secondary Containment. This confirms our belief that there is no safety basis for the existing requirement in our Technical Specifications. We plan to pursue a permanent change to both the Unit 1 and Unit 2 Technical Specifications in the future that will provide consistency with the new STS.

Documented NRR concurrence with this interpretation is requested by Wednesday, December 15, 1993. We currently anticipate that the water level modifications will take no longer than 4 days; this includes post modification testing.

Any questions should be directed to Mr. R. Sgarro at (215) 774-7914.

Very truly yours,



R. G. Byram

cc: NRC Document Control Desk (original)
NRC Region I
Mr. G. S. Barber, NRC Sr. Resident Inspector - SSES
Mr. R. J. Clark, NRC Sr. Project Manager - Rockville