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 KEISER, H. W. Pennsylvania Power & Light Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
 ADENSAM, E. BWR Project Directorate 3

SUBJECT: Forwards application for Proposed Amends <sup>See Reports</sup> 85 & 40 to Licenses NPF-14 & NPF-22, respectively, revising Tech Specs for administrative purposes. Fee paid.

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10/10/50	16:00	Room 101	Meeting
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Harold W. Keiser  
Vice President-Nuclear Operations  
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AUG 05 1986

Director of Nuclear Reactor Regulation  
Attention: Ms. E. Adensam, Project Director  
BWR Project Directorate No. 3  
Division of BWR Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION  
PROPOSED AMENDMENTS 85 TO LICENSE NO. NPF-14  
AND 40 TO LICENSE NO. NPF-22  
PLA-2698

Docket Nos. 50-387  
50-388

FILE R41-2

Dear Ms. Adensam:

The purpose of this letter is to propose changes of an administrative nature to the Susquehanna SES Unit 1 and Unit 2 Technical Specifications.

The marked-up changes and No Significant Hazards Considerations are provided as attachments to this letter.

Any questions on this material should be directed to Mr. R. Sgarro at (215) 770-7855. Pursuant to 10CFR170, the appropriate fee is enclosed.

Very truly yours,

H. W. Keiser  
Vice President-Nuclear Operations

Attachments

cc: M. J. Campagnone           USNRC  
L. R. Plisco                    USNRC

T. M. Gerusky, Director  
Bureau of Radiation Protection  
PA Dept. of Environmental Resources  
P.O. Box 2063  
Harrisburg, PA 17120

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## NO SIGNIFICANT HAZARDS CONSIDERATIONS

The majority of the changes described below are obviously administrative in nature and therefore do not:

- (1) involve a significant increase in the probability or consequences of an accident previously evaluated,
- (2) create the possibility of a new or different kind of accident from any accident previously evaluated, nor
- (3) involve a significant reduction in a margin of safety.

Where further clarification is required, it has been provided.

### UNIT ONE

- o Index: Various changes based upon the changes proposed herein as well as a review of the current document in its entirety.
- o p. 1-1: Average Bundle Exposure and Average Planar Exposure have been grouped under "Average Exposure" so that both have reference numbers.
- o p. 3/4 0-1: For consistency, ACTION should be in all capital letters; it is a defined term.
- o p. 3/4 0-2: Typographical error; "Specifications" is misspelled.
- o p. 3/4 2-1: The asterisk was inadvertently omitted when a reference to Figure 3.2.1-3 was dropped in Amendment 57. The asterisk was present when the Amendment governing single loop operation (#56) was issued.
- o old p. 3/4 2-2: Delete blank page.
- o old p. 3/4 2-3: Renumber page due to deletion.
- o old p. 3/4 2-4: Renumber page due to deletion.
- o old p. 3/4 2-5: Renumber page due to deletion.
- o old p. 3/4 2-6: A 4.0.4 exemption is necessary to perform the subject surveillances. Such exemptions were provided for the affected Power Distribution Limit specifications via Amendment 29; this exemption, for MCPR, was inadvertently dropped when the MCPR specification was altered in support of the Cycle 2 reload (Amendment 45).
- o old p. 3/4 2-7: Delete blank page.
- o old p. 3/4 2-8: Renumber page due to deletions.
- o old p. 3/4 2-9: Renumber page due to deletions.
- o old p. 3/4 2-10: Renumber page due to deletions.
- o old p. 3/4 2-10a: Renumber page due to deletions.

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- o old p. 3/4 2-10b: Renumber page due to deletions.
- o p. 3/4 3-5: Note (i) has been revised to incorporate the asterisk rather than repeat the information provided in the footnote. The asterisk footnote was not deleted because it is already being used in Note (c).
- o p. 3/4 3-11: I. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated. This change corrects a typographical error; the design has always contained one channel per trip system.

Secondary containment is isolated by two common, divisionally redundant trip systems; there are two divisionally separate radiation monitors servicing the single Railroad Access Shaft Exhaust Duct. Therefore, secondary containment isolation on high radiation in this duct is a fully redundant safety function.

Operation with one Railroad Access Shaft Exhaust Duct Radiation trip channel per trip system is fully consistent with the requirements for secondary containment isolation capability following a LOCA or fuel handling accident.

II. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated; see I above.

III. The proposed change does not involve a significant reduction in a margin of safety; see I above.

- o p. 3/4 3-17: For trip function 1.e, a typographical error has been corrected; this setpoint was approved by NRC in Amendment 58. For Trip Functions 2.c, d, and e, the footnote is being deleted since no changes were determined necessary as a result of the startup test program, and therefore the footnote no longer has any purpose. Also for 2.e, a typo in the setpoint units has been corrected. For 3.a, a typo that occurred in Amendment 58 has been corrected.
- o p. 3/4 3-18: See discussion above pertaining to footnote.
- o p. 3/4 3-19: See discussion above pertaining to footnote.
- o p. 3/4 3-20: See discussion above pertaining to footnote.
- o p. 3/4 3-98: The word "Continued" has been deleted since this Table consists of only one page.
- o p. 3/4 4-1c: The appropriate MAPLHGR Figure references have been provided in order to correct administrative errors in processing. The current references reflect the original (April 11, 1985) Single Loop Operation

(SLO) amendment submittal to NRC without taking into account the affects of the subsequent Cycle 3 reload submittal (January 16, 1986). Prior to the April 11th submittal, three Figures existed in the Unit 1 Tech Specs:

Figure 3.2.1-1: GE 1.83% enriched,  
Figure 3.2.1-2: GE 2.33% enriched, and  
Figure 3.2.1-3: Exxon 2.72% enriched.

When the SLO amendment was proposed, these Figures were not revised, but the GE 2.33% enriched Figure was used for the Exxon limit during SLO. Therefore, it was established that only the GE curves would be used in support of SLO.

The Cycle 3 reload proposal was submitted prior to SLO being approved. That submittal left the Tech Specs with two MAPLHGR Figures:

Figure 3.2.1-1: GE 2.33% enriched, and  
Figure 3.2.1-2: Exxon - all 8x8 fuel.

This is where the appropriate changes were missed. The Tech Specs should have continued to reference the GE curve, Figure 3.2.1-1, for SLO.

In part c. of the LCO, the Figure reference has been corrected due to a typographical error - it should be 3/4.1.1.1-1.

- o p. 3/4 5-1: This special test exception was renumbered due to the deletion of the current 3.10.5.
- o p. 3/4 6-10: This change is wholly administrative in nature; no technical changes have occurred. This footnote was originally proposed to clarify the requirements of 4.6.1.7 and ended up confusing them due to its dual meaning. It was added to ensure that where two elevations were listed (as in d; an asterisk exists on c because prior to Amendment 34, two elevations existed), both would not contribute to the minimum 3 values required. This is because those three are supposed to be representative of 3 of the 4 different areas being used for the average temperature calculation. If two had been used in the same area, it would skew the average toward the temperature in that area. Unfortunately a more conservative interpretation leads one to believe that c and d together are affected by the footnote and therefore, the measurements can only include one from a, one from b, and one from c and d together.

In order to rectify these problems, a single area has been associated with each of the elevation categories and the footnote has been dropped. Accordingly, "elevations" has been replaced with "areas" in the text of 4.6.1.7. The areas listed are consistent with those currently listed in the associated procedure.

- o p. 3/4 6-13: This requirement was inadvertently dropped by NRC when Amendment 36 was issued. It is being reinstated in its previous form.





- o p. 3/4 6-31: The wording has been changed to be consistent with the rest of the surveillance requirements in this section. No technical change to the requirement has occurred.
- o p. 3/4 6-35: The equal sign was inadvertently dropped by NRC when Amendment 35 was issued. It is being reinstated.
- o p. 3/4 6-38: This specification was misnumbered when the Unit 1 Tech Specs were originally issued. It has been appropriately corrected.
- o p. 3/4 6-39: See discussion above for renumbering. The reference to the Special Test Exception is being dropped because the exception is being deleted.
- o p. 3/4 7-2: Typographical error; "a" should be "at".
- o p. 3/4 7-4: Typographical error; footnote \*\* was deleted in Amendment 1 to the Unit 1 Tech Specs.
- o p. 3/4 7-22: Typographical error; the correct designations for the Halon systems begin with "IU" not "IO".
- o p. 3/4 8-8: Typographical error; the heading should be "UNIT 1 AND UNIT 2".
- o p. 3/4 8-9: The footnote has been changed to be consistent with similar footnotes in other specifications (e.g. 3.6.5.1). What appear to be additional restrictions merely enforce as an LCO what is currently required by the ACTION statement.
- o p. 3/4 8-15: See discussion above.
- o p. 3/4 8-19: Typographical errors; the header should be "DISTRIBUTION-SHUTDOWN" and the reference to "continued" is being deleted since this is the first page of the specification.
- o p. 3/4 8-33: The reference to "plant" has been changed to "unit" since plant can be construed as both units. Unit 2 Tech Specs appropriately control this equipment for Unit 2.
- o p. 3/4 9-1: Footnote # is being deleted since this definition is already provided in Table 1.2.
- o p. 3/4 10-4: A reference to the single loop operation specification has been added, since a footnote on the APPLICABILITY of that specification references this special test exception. The exception is provided in the event that natural circulation testing is necessary during extended single loop operation.
- o p. 3/4 10-5: This specification only applies during the Startup Test Program, and is therefore being deleted.

- o old p. 3/4 10-6: Specification and page renumbered due to deletion of Specification 3.10.5.
- o p. 3/4 11-19: Typographical error; the word "one" should be inserted as shown on the mark-up.
- o p. 3/4 11-20: Typographical error; "OPERABLE" is misspelled.
- o p. B 3/4 1-1: This change corrects the definition of R provided; it is consistent with the change made in proposed amendment 39 to License No. NPF-22 (see PLA-2661, dated June 19, 1986).
- o p. B 3/4 1-4: The additional information was simply extracted from page B 3/4 1-5, which is being deleted.
- o p. B 3/4 1-5: Delete; see discussion above.
- o p. B 3/4 10-1: Delete; the associated specification is being deleted.
- o p. 5-2: A new figure is being provided to reflect real estate transactions which have changed the PP&L property line. Other physical changes, such as the additions to the Training Center and the new Diesel Generator 'E' bldg., have been added as well.
- o p. 5-4: See discussion above.
- o p. 6-16: Typographical error; the correct word is "residual".

UNIT TWO

- o Index: Various changes based upon the changes proposed herein as well as a review of the current document in its entirety.
- o p. 3/4 0-1: For consistency, ACTION should be in all capital letters; it is a defined term.
- o p. 3/4 0-2: Typographical error; "Specifications" is misspelled.
- o p. 3/4 1-6: The deleted portion of this footnote is redundant to information already provided by Definition 1.7, CORE ALTERATION.
- o p. 3/4 3-5: Note (1) has been revised to incorporate the asterisk rather than repeat the information provided in the footnote. The asterisk footnote was not deleted because it is already being used in Note (c).
- o p. 3/4 3-11: I. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated. This change corrects a typographical error; the design has always contained one channel per trip system.

Secondary containment is isolated by two common, divisionally redundant trip systems; there are two divisionally separate radiation monitors servicing the single Railroad Access Shaft Exhaust Duct. Therefore, secondary containment isolation on high radiation in this duct is a fully redundant safety function.

Operation with one Railroad Access Shaft Exhaust Duct Radiation trip channel per trip system is fully consistent with the requirements for secondary containment isolation capability following a LOCA or fuel handling accident.

- II. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated; see I above.
- III. The proposed change does not involve a significant reduction in a margin of safety; see I above.
- o p. 3/4 3-17: The footnote is being deleted since no changes were determined necessary as a result of the startup test program, and therefore the footnote no longer has any purpose.
- o p. 3/4 3-18: See discussion above.
- o p. 3/4 3-19: See discussion above.
- o p. 3/4 3-20: See discussion above.

- o p. 3/4 3-53: Typographical error; footnote \*\*\* should read "... eight or fewer ...".
- o p. 3/4 3-71: Typographical error; this footnote was erroneously attributed to a monitor which does not monitor secondary containment. This footnote does not exist for this monitor in the Unit 1 Tech Specs.
- o p. 3/4 3-72: Typographical error; the redundant wording in ACTION 81 is being deleted.
- o p. 3/4 3-78: Corrects to be consistent with Unit 1 Tech Specs for this common zone. This resolves an NRC inspector open item.
- o p. 3/4 3-79: For Zone 0-27B, the minimum value is revised to be consistent with our philosophy that at least half of the detectors in a given Zone must be OPERABLE. This is consistent with Unit 1. For Zone 0-27C, the numbers are corrected for consistency with Unit 1 based on the associated design drawing. These changes resolve an NRC inspector open item.
- o p. 3/4 4-1c: In part c. of the LCO, the Figure reference has been corrected due to a typographical error - it should be 3/4.1.1.1-1.
- o p. 3/4 4-3: Typographical error - the correct Specification is 3.4.1.1.1.
- o p. 3/4 5-1: This special test exception was renumbered due to the deletion of the current 3.10.5.
- o p. 3/4 6-10: This change is wholly administrative in nature; no technical changes have occurred. This footnote was originally proposed to clarify the requirements of 4.6.1.7 and ended up confusing them due to its dual meaning. It was added to ensure that where two elevations were listed (as in c and d) that they both would not contribute to the minimum 3 values required. This is because those three are supposed to be representative of 3 of the 4 different areas being used for the average temperature calculation. If two had been used in the same area, it would skew the average toward the temperature in that area. Unfortunately a more conservative interpretation leads one to believe that c and d together are affected by the footnote and therefore, the measurements can only include one from a, one from b, and one from c and d together.

In order to rectify these problems, a single area has been associated with each of the elevation categories and the footnote has been dropped. Accordingly, "elevations" has been replaced with "areas" in the text of 4.6.1.7. The areas listed are consistent with those currently listed in the associated procedure.

- o p. 3/4 6-31: Typographical error; footnote \*\* should read, "... or Zone II and Zone III when ...".
- o p. 3/4 6-41: The reference to the Special Test Exception is being dropped because the exception is being deleted.
- o p. 3/4 7-2: Typographical error; "a" should be "at".



- o p. 3/4 8-10: The footnote has been changed to be consistent with similar footnotes in other specifications (e.g. 3.6.5.1). What appear to be additional restrictions thereby enforce as an LCO what is currently required by the ACTION statement.
- o p. 3/4 8-16: See discussion above.
- o p. 3/4 8-35: The reference to "plant" has been changed to "unit" since plant can be construed as both units. Unit 1 Tech Specs appropriately control this equipment for Unit 1.
- o p. 3/4 9-1: Footnote # is being deleted since this definition is already provided in Table 1.2.
- o p. 3/4 10-4: A reference to the single loop operation specification has been added, since a footnote on the APPLICABILITY of that specification references this special test exception. The exception is provided in the event that natural circulation testing is necessary during extended single loop operation.
- o p. 3/4 10-5: This specification only applies during the Startup Test Program, and is therefore being deleted.
- o old p. 3/4 10-6: Specification and page renumbered due to deletion of Specification 3.10.5.
- o p. 3/4 11-20: Typographical error; "OPERABLE" is misspelled.
- o p. B 3/4 10-1: Delete; the associated specification is being deleted.
- o p. 5-2: A new figure is being provided to reflect real estate transactions which have changed the PP&L property line. Other physical changes, such as the addition to the Training Center and the new Diesel Generator "E" bldg., have been added as well.
- o p. 5-4: See discussion above.
- o p. 6-4: Typographical error; the noted reference to Unit 1 should be Unit 2.

#### CONCLUSIONS

Based on the above descriptions the proposed changes are editorial in nature and therefore have no adverse impact on the safe operation of Susquehanna Units 1 and 2.

