

**PP&L**

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July 30, 1980

NORMAN W. CURTIS  
Vice President - Engineering & Construction - Nuclear  
821-5381

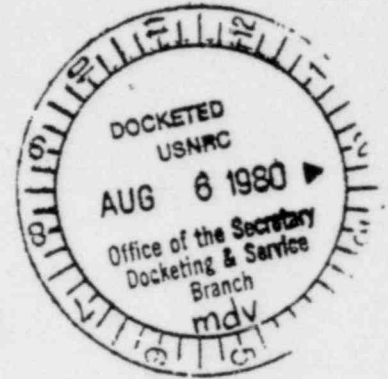
DOCKET NUMBER

PROPOSED RULE

PR-Misc Notice (11)  
Standard Review Plan  
(45 FR 36236)

Secretary of the Commission  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Docketing and Service Branch



SUSQUEHANNA STEAM ELECTRIC STATION  
COMMENTS ON SRP-3.9.6 REV. 2  
ER 100450 FILE 841-9  
PLE 214

Dear Sir:

Pennsylvania Power and Light Company has the following comments on Standard Review Plan 3.9.6 Revision 2:

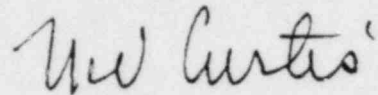
- o The use of the term "procedures" in Paragraph I, Paragraph II.2.b, and Paragraph III.1.d, implies that a review of detailed testing procedures for each pump and valve is required. These paragraphs should utilize the term "Commitments" versus "Procedures".
- o It should be stated that the proposed Appendix A to S.R.P. 3.9.6, Leak Testing of Pressure Isolation Valves does not apply to "Containment Isolation Valves" that are leak tested in accordance with Appendix J to 10CFR50.
- o Appendix A to SRP 3.9.6, step a) should read ----the testing frequency will be each time the "check" valves are disturbed because of flow in the line. This addition is for agreement with the Valve-Impact Statement Paragraph I, last sentence.
- o Appendix A to SRP 3.9.6, Paragraph 7 should read "In cases where pressure isolation is provided by two valves, both valves will be leak tested and a leak rate calculated for each independent valve.

*IDAR-5  
JAC. Pic.*

Acknowledged by card. 8-6-80. mdt

- o Appendix A to SRP 3.9.6, Paragraph 8, how was the 1.0 gpm leak rate acceptance criteria established for each valve?

Very truly yours,

A handwritten signature in cursive script that reads "N. W. Curtis".

N. W. Curtis  
Vice President, Engineering  
and Construction - Nuclear