# UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

# BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of

PENNSYLVANIA POWER AND LIGHT CO. ALLEGHENY ELECTRIC COOPERATIVE, INC. Docket Nos. 50-387 OL 50-388 OL

(Susquehanna Steam Electric Station, Units 1 and 2)

> NRC STAFF'S RESPONSE TO APPEAL BOARD'S ORDER OF OCTOBER 26, 1982

> > James M. Cutchin, IV Counsel for NRC Staff

November 9, 1982

Certified By DS CAR Del

8211100199 821109 PDR ADOCK 05000387 G PDR

2

## UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

#### BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

PENNSYLVANIA POWER AND LIGHT CO. ALLEGHENY ELECTRIC COOPERATIVE, INC.

In the Matter of

Docket Nos. 50-387 OL 50-388 OL

(Susquehanna Steam Electric Station, Units 1 and 2)

## NRC STAFF'S RESPONSE TO APPEAL BOARD'S ORDER OF OCTOBER 26, 1982

# I. INTRODUCTION

By an Order dated October 26, 1982 the Appeal Board requests that the Applicants and the NRC Staff provide certain information concerning reactor coolant system change of leak rate detection. Pointing to testimony by Applicants concerning detection of increases in unidentified leakage and comparing the Technical Specifications for Susquehanna Unit 1 to guidance in NUREG-0313 (Rev. 1) and to the Standard Technical Specifications for Boiling Water Reactors, the Appeal Board notes the apparent omission from the Technical Specifications for Unit 1 of a limiting condition for operation (LCO) addressed to an increase in the rate of unidentified leakage. Because of this apparent omission, the Applicants are asked to tell the Appeal Board how they intend to implement the system for monitoring the change of leak rate that they testified to at the hearing, and the Staff is asked to tell the Board how and where the Technical Specifications for Unit 1 deal with the issue of the monitoring of the change of rate of unidentified leakage and the relationship of that issue to NUREG-0313 (Rev. 1) guidance and the Standard Technical Specifications. In addition, both the Staff and the Applicants are asked by the Appeal Board to evaluate the importance of the omission and the necessary action to be taken if indeed the change of rate of unidentified leakage is not now addressed in the Unit 1 Technical Specifications. The Staff's response is provided below.

# II. DISCUSSION

The Appeal Board is correct in its observation that the Technical S ifications for Susquehanna Unit 1 presently do not contain an LCO on the rate of increase in unidentified leakage.

On November 2nd Applicants filed their response to the Appeal Board's Order. In their response the Applicants explain the discrepancy between the testimony cited by the Appeal Board and other testimony in the record and indicate that to be consistent with the correct testimony and the guidance in NUREG-0313 (Rev 1) the Technical Specifications for Unit 1 should contain a provision requiring plant shutdown if unidentified leakage increases by 2 gallons per minute (gpm) or more within any four-hour period.  $\frac{1}{}$  Applicants indicate that they are now preparing papers to request that the Unit 1 Technical Specifications be amended to include the omitted LCO.

- 2 -

<sup>1/</sup> The inclusion of the omitted LCO also would be consistent with the provision of the Standard Technical Specifications for BWR's that was cited by the Appeal Board.

# III. CONCLUSION

In the view of the Staff amendment of Section 3.4.3.2 of the Technical Specifications for Susquehanna Unit 1 to include an LCO that limits increases in unidentified leakage to no more than 2 gpm in any four-hour period is the only action that is necessary.

Respectfully submitted,

James M. Cutchin, IV Counsel for NRC Staff

Dated at Bethesda, Maryland this9th day of November 1982

## UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

## BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of

PENNSYLVANIA POWER AND LIGHT CO. ALLEGHENY ELECTRIC COOPERATIVE, INC. Docket Nos. 50-387 OL 50-388 OL

(Susquehanna Steam Electric Station, Units 1 and 2)

### CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF'S RESPONSE TO APPEAL BOARD'S ORDER OF OCTOBER 26, 1982", dated November 9, 1982, in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or as indicated by an asterisk through deposit in the Nuclear Regulatory Commission's internal mail system, this 9th day of November, 1982:

- \*Mr. Thomas S. Moore, Chairman Administrative Judge Atomic Safety and Licensing Appeal Board U.S. Nuclear Regulatory Commission Washington, DC 20555
- \*Dr. John H. Buck Administrative Judge Atomic Safety and Licensing Appeal Board U.S. Nuclear Regulatory Commission Washington, DC 20555
- \*Stephen F. Eilperin Administrative Judge Atomic Safety and Licensing Appeal Board U.S. Nuclear Regulatory Commission Washington, DC 20555

James P. Gleason, Chairman Administrative Judge 513 Gilmoure Drive Silver Spring, MD 20901 \*Mr. Glenn O. Bright Administrative Judge Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Washington, DC 20555

Dr. Paul W. Purdom Administrative Judge 245 Gulph Hills Road Radnor, PA 19087

Jay Silberg, Esq. Shaw, Pittman, Potts and Trowbridge 1800 M Street, NW Washington, DC 20036

Bryan A. Snapp, Esq. Pennsylvania Power & Light Company Two North Ninth Street Allentown, PA 18101 Dr. Judith H. Johnsrud Co-Director Environmental Coalition on Nuclear Power 433 Orlando Avenue State College, PA 16801

Mr. Thomas M. Gerusky, Director Bureau of Radiation Protection Department of Environmental Resources Commonwealth of Pennsylvania P. O. Box 2063 Harrisburg, PA 17120

Ms. Colleen Marsh Box 538A, RD #4 Mountain Top, PA 18707

Mr. Thomas J. Halligan Correspondent: CAND P. O. Box 5 Scranton, PA 18501

G. Rhodes Resident Inspector P. O. Box 52 Shickshinny, PA 18655

Robert W. Adler 505 Executive House P. O. Box 2357 Harrisburg, PA 17120 Mr. DeWitt C. Smith, Director Pennsylvania Emergency Management Agency Transportation and Safety Building Harrisburg, PA 17120

Susquehanna Environmental Advocates c/o Gerald Schultz, Esq. P. O. Box 1560 Wilkes-Barre, PA 18703

- \*Atomic Safety and Licensing Board Fanel
  U.S. Nuclear Regulatory Commission Washington, DC 20555
- \*Atomic Safety and Licensing Appeal Board Panel U.S. Nuclear Regulatory Commission Washington, DC 20555

\*Document Management Branch Document Control Desk Room 016, Phillips Building

it James M. Cutchin, IV Counsel for NRC Staff