





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 Specifications 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.<sup>1/</sup> Applicants indicate that they are now preparing papers to request that the Unit 1 Technical Specifications be amended to include the omitted LCO.

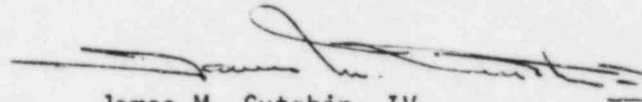
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<sup>1/</sup> The inclusion of the omitted LCO also would be consistent with the provision of the Standard Technical Specifications for BWR's that was cited by the Appeal Board.

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,



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this 9th day of November 1982



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