## ORIGINAL

DISCUSSION/POSSIBLE VOTE ON FULL POWER OPERATING LICENSE FOR SUSQUEHANNA-2

## UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

In the matter of:

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1	UNITED STATES OF AMERICA
2	NUCLEAR REGULATORY COMMISSION
3	DISCUSSION/POSSIBLE VOTE ON FULL POWER OPERATING
4	LICENSE FOR SUSQUEHANNA-2
5	- PUBLIC MEETING
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7	Nuclear Regulatory Commission 1717 H Street, N.W. Room 1130
8	Washington, D.C.
9	
10	Thursday, May 24, 1984
11	The Commission met, pursuant to notice, at
12	2:00 p.m.
13	COMMISSIONERS PRESENT:
14	NUNZIO PALLADINO, Chairman of the Commission THOMAS ROBERTS, Commissioner
15	JAMES ASSELSTINE, Commissioner FREDERICK BERNTHAL, Commissioner
16	STAFF AND PRESENTERS SEATED AT COMMISSION TABLE:
17	E. CHRISTENBURG
18	R. STAROSTECKY T. MURLEY
19	R. PURPLE B. KENYON
20	
21	AUDIENCE:
22	T. NOVAK H. THOMSON
23	
24	
25	

## DISCLAIMER

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## PROCEEDINGS

CHAIRMAN PALLADINO: Good afternoon, ladies and gentlemen. The Commission is meeting this afternoon regarding the full power authorization of Susquehanna Unit No. 2.

On March 23, 1984, the staff issued a license authorizing the facility to operate at power levels not exceeding 5% of fule design rating. I understand that the plant will soon be ready to exceed 5% and continue with the power ascension program.

According to the background information sent to the Commissioners, the staff is ready to recommend that Operation Full Power be authorized. Therefore, at the end of today's meeting, I will be asking the Commissioners to vote on whether or not to approve the recommendation; however, before taking — asking for that vote, I would like OGC's comments on financial qualifications insofar as this issue pertains to the Susquehanna-2 decision.

Are there any additional remarks before we begin?

COMMISSIONER ASSELSTINE: I'd just add that I'm glad you brought up the financial qualification question because I think that's one we have to address.

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C.R. NRC/9 Tape 1 CHAIRMAN PALLADINO: Okay. Any other comments? Well, then, let me turn the meeting over to Bob Purple.

MR. PURPLE: All right. Thank you very much. The outline of our presentation today is as shown on the viewgraph on the wall. As is traditional, we'll break it into two pieces, where I will give you some of the background, the status, and the schedule items as well as a couple of selected review topics. Tom Murley and Rick Starostecky from Region I will talk about operating experience of this applicant, both at Unit I and on Unit 2.

The applicant is here today and is prepared to speak to the Commission or answer any questions the Commissioners may have, and they would welcome that opportunity.

I was going to mention myself financial qualification as an issue the Commissioners need to consider. Briefly, the -- as I understand, the background to remind you of what we had presented when we were here on that financial qualification subject two weeks ago, Susquehanna is one of the plants where there had been a contention raised on financial qualifications, and the contention was litigated in the hearing process, but prior to the Board issuing

its decision, the 1982 Rule came out; therefore, the Board didn't reach an initial decision on the litigated issue.

It's my understanding that the issue that
was litigated was not the broad subject of financial
qualification but a relatively narrow subject
related to the ability to finance the decommissioning
needs, but beyond that, I don't know any details on
it.

CHAIRMAN PALLADINO: Well, I thought that one was, was resolved favorably. It was the other one where the contention was that --

MR. PURPLE: I'll, I'll pass.

CHAIRMAN PALLADINO: -- if that's -- my information is incorrect. Let's see if I can find it.

MR. CHRISTENBURG: Mr. Chairman, there was health effects aspects of the, the decommission which the Board did go ahead and, and resolved, but indicated dropped a footnote, said in light of the, the March 30th, --

CHAIRMAN PALLADING: The financial rule.

MR. CHRISTENBURG: -- March rule, financial qualification rule, they wouldn't resolve the rest of contention 9(b).

I got from my legal assistant is the contention
was to the effect that the applicant is not financially
qualified to decommission the plant, excuse me.

A related contention concern, decommissioning costs
and the need for cost benefit balance. The Board
resolved that contention in the applicant's favor.

So, I stand corrected.

MR. PURPLE: With that, we'll go to viewgraph No. 3. We'll come back to financial qualifications.

CHAIRMAN PALLADINO: Yes.

MR. PURPLE: We'll want to discuss it with

-- well, the key items here I think is more importantedly
at the bottom of the chart, showing you the Unit 2

status and schedule. As the Chairman mentioned,
the low power license was issued near the end of

March of this year. The viewgraph shows the schedule
of events since that time. You might note that the
applicant anticipated schedule for these events.

They've beaten that schedule.

For example, by having their initial criticality on May 8th, I'm advised that that's 13 days ahead of their schedules. So, they apparently have done well in their initial start-up.

The viewgraph shows ready to exceed 5% power on May 28th. Since we prepared that viewgraph, that date has slipped some. The best guess right now is that they would actually be ready to pass through 5% in their start-up program on the week of 4-6 June.

It would be our intent with the Commissioner's vote today to approve the full power authorization, that we would issue that authorization in time to not hold up the license from proceeding to that 5% but to let them get through a little bit more of the start-up test program that they haven't gotten through yet because of some difficulties with the valve. And we would watch it very closely and be sure that we issue the authorization in time not to preclude an orderly start-up in power.

Selected review items. We'll go on to viewgraph No. 5.

COMMISSIONER ASSELSTINE: But that looks like the first week in June, Bob?

MR. PURPLE: Yes, the first week in June is, is the best guess right now. Because of our current interest in shift staffing and experience and hot operating experience, we've decided to include that in the briefing for Susquehanna-2 today,

Susquehanna-2 being a second unit, of course, has a rather large advantage because they have a crew of people there that are already operating a sister unit. And as a matter of fact, all of their operators are cross trained on both units.

The first bullet here showing 5 shift operation is correct for today and through their start-up ascension program. The applicant's intent is to operate normally on a 6 shift basis and they have the people to do it. They're doing 5 shift now because they feel that makes more sense during the start-up operation when there is a lot more activity going on. They have more people on shift. And they would intend to, toward the end of this year as they end their start-up test program, power ascension program, to revert or convert to a 6 shift operation.

The staffing needs are the minimum required needs, that bullet that shows 2 SROs, 3 ROs and 1 Shift Technical Advisor. If you look at the number — the numbers down below at the bottom of the slide, you will see that, that even as of today, they have sufficient people to man a 6 shift operation if they chose to. And they will choose to once they get through the start-up test.

I believe we have a typographical error on that slide. That auxiliary unit supervisor, that word should be assistant unit supervisor in both places. The two -- the fourth and fifth entry at the bottom bullet where it says auxiliary unit supervisor, that is a mistake.

UNIDENTIFIED SPEAKER: What should it say?

MR. PURPLE: Assistant unit supervisor.

On the next viewgraph, we show the shift staffing and experience level of those people referred to on the previous chart. The key column being that on the right hand which shows the number of types of license, the personnel that have six months or more of hot operating experience. Notice that all of the shift supervisors do and most of the other control room supervisors and plant control room operators do have more than six months operating experience. I'm sure that the bulk of that is from operating Unit 1.

COMMISSIONER ASSELSTINE: Could you talk
a little bit more detail -- in detail about what the
-- what that -- the experience is for those 17
people? How many of them have had at least six months
experience in operating Unit 1? How many of them
have prior operating experience at a similar plant --

MR. PURPLE: As opposed to Unit 1?

COMMISSIONER ASSELSTINE: -- somewhere else. Yeah.

MR. PURPLE: I don't have that information myself. Let me see if someone here does. We can ask the licensee, as well, --

COMMISSIONER ASSELSTINE: Okay.

MR. PURPLE: -- if that's --

MR. THOMSON: Hugh Thomson, NRC staff.

We did not do a complete reevaluation of the Unit 1
experience level. We did when we licensed Unit 1,
required them to have operating experience on each
shift. At that time, they went from 5 shift, I
believe, to 4 shift operation in order to obtain
experience to operators on each shift from their own
staffing. They did not use advisors per se.

And, so, I could -- I would tend to say that they had four senior operators on each shift with previous operating experience outside or beyond the Unit I operation. So, they -- currently, though, all of their operators are duely -- duel licensed. Most of that -- most of their experience is on the Unit I facility.

COMMISSIONER ASSELSTINE: Maybe the licensee when it gives its presentation could highlight

the, the individual experience of those 17 people.

MR. PURPLE: Okay, sure. The bottom line of this chart was -- had shown that the staffing experience, in our view, certainly meets and exceeds the industry recommendations for such operating experience.

The second item of selected review items that I was going to talk about is the technical specifications for this station. It's viewgraph No. 7 which is on the wall. We did receive from the applicant, the licensee, their certification that the technical specifications are consistent with the FSAR and the as-built plant. Remembering that this is a second unit, the Unit 2 tech specs were based upon the Unit 1 tech specs and changed where needed and where it was felt that it made more sense to change the tech specs, that is, to improve them. And I will talk about that at some length. Let me pass by that, and I will come back.

CHAIRMAN PALLADINO: Okay. I was going to ask you a --

MR. PURPLE: Yeah.

CHAIRMAN PALLADINO: -- question about the quantity and nature of the differences.

MR. PURPLE: Yes. I'll, I'll come back

to that in just a minute. Let me go on through what's here.

The -- what differences did exist, the licensee has conducted training of the shift people so that they are trained in the differences between the tech specs that exist today between Unit 1 and Unit 2.

I might add that at this point I'll say
it, and I'll probably repeat myself in a minute, but
with respect to those differences that exist, we
have received on the 18th of May a very hefty
application for amendment to the Unit 1 tech specs
which we intend to process very quickly, which will
eliminate essentially all of the differences between
Unit 1 and Unit 2 where it makes sense to eliminate
the differences. If you have a design difference,
you can't -- you're bound to have a difference.

CHAIRMAN PALLADINO: So, are you saying the tech specs for Unit 1 wer: -- out wrong or

MR. PURPLE: No. Let me -- if I may come back to that in just a minute, but I wanted to mention that although there are differences, I simply wanted to make the point that they won't last for long. We do have an application in hand

which eliminates any of the differences between the two. I will come back in just a minute to how those differences came about and why they're there, if I might.

What I'd like to do, if I may, just go on to the bottom of this slide to talk about the general quality of the tech specs and the, the extra efforts that the staff took to insure that in light of the experience that we had at Grand Gulf as we had done on several recent licenses.

We did conduct two kinds of separate independent audits. One of them performed by EG&G of Idaho, comparing selected portions of the tech specs, between the tech specs and the FSAR and the Safety Evaluation Report. And I'll talk about the results of that.

Similarly, under the guidance and direction of Region 1, Franklin Research Center performed an audit of the tech specs concurred in the as-built plant for certain other selected systems in the plant.

The bottom line of those two audits were that there were no significant discrepancies and no indication of a wide spread problem in the accuracy or quality of the tech specs.

CHAIRMAN PALLADINO: No significant discrepancies between the tech specs as compared to the plant as-built --

MR. PURPLE: Both.

CHAIRMAN PALLADINO: -- or no significant differences between Unit 1 and Unit 2?

MR. PURPLE: No, no significant differences

-- discrepancies between the tech specs and the
as-built plant, the FSAR or the SER. It didn't -none of these audits looked into any differences
between the two units in, in particular.

CHAIRMAN PALLADINO: Oh, I see.

MR. PURPLE: This was just to look at the unit to -- and say, hey, do we have the right tech specs or don't we?

CHAIRMAN PALLADINO: And you're going to cover the nature of some of these differences?

MR. PURPLE: Of the discrepancies? Yes, and, and of the differences between Unit 1 and Unit 2. We have two topics running here.

If you would take -- if you would take the two unit tech specs -- let me talk about the difference between Unit 1 and Unit 2, and there's no viewgraph here to cover what I'm about to say.

If you lay the Unit 1 tech specs as they

exist today alongside of the Unit 2 tech specs and simply start flipping pages and everywhere you found the difference between the two tech specs, you said that's, that's a -- that's a change on a page between the two. Out of a tech spec that has something like close to 500 pages, about half of them would have a change on it. They'd be different one way or another.

We've tried to analyze those. Now, it may be that six of those pages may be the same word change. There's changes in these tech specs that are like changing the spelled out word O-N-E and putting in the Arabic Numeral I, that kind of thing. That may appear on six or eight pages, and I'd still count that as being six pages that are different.

We tried to and the applicant, the licensee, tried to characterize the changes in some kind of percentages. And if you think about it for a minute, you can see it's very difficult to do. How do you count those kind of changes like the example I just gave? So, you can count it a number of different ways.

The -- generally speaking, the differences
-- if you take them in percentages, first we put
them in the four kinds of bins. There are some
that are purely administrative, like the example I

just gave. It simply changes from a an alpha word to a numeric word or a typographical error. There was no point in repeating a typographical error in the Unit 2 tech specs. So, they corrected it, but the Unit 1 one hadn't yet been changed. So, that became a difference.

In that class, that amounts to about 40% of all the changes, are purely administrative. Between the issuance of the Unit 1 license and the Unit 2 license, the Commission issued a revision to Part 72/73 reporting requirements which had in it the requirement or the statement that you don't need to put any of these things in tech specs anymore because they're in the regulations.

Well, reporting requirements were sprinkled throughout the Unit 1 tech specs because they were required to at the time that license was issued. They weren't required to in Unit 2. So, therefore, you have a lot of pages you've generated now that are different. That amounts to 12% of the -- of the changes.

Between the two units, you do have differences in design. There are some differences in design. They are sister units, but when you get down the details as they progressed in the design of

Unit 2 and Unit -- between Unit 2 and Unit 1, certain things came out differently. For those, you obviously have changes. Your, your valve types are different. Your calibration levels may be different and so forth for equipment they selected. That amounts to about 13, 13%.

Those, of course, where there are design differences would likely never to change. In some cases, those design differences are things that were put in place for Unit 2, like PMI-1 requirements of some kind that ultimately will get caught up on Unit 1, at which point when they change the system, it may be they'll put in the same equipment. Then it won't be. They'll -- the tech specs for Unit 1 would then be changed and there wouldn't be a difference. But generally speaking, that 13% will probably always stay different because you have different equipment.

The last category which amounts to 35%, you would characterize as technical changes. These are changes that -- an example, first of all, they'd be changes that came about because of changes to the standard tech specs as time went by. Standard tech specs are modified as new generic requirements come out, as USIs are resolved. Many times the

resolution of a USI or a generic issue is that we've got to do something new. And one thing we have to do is change the SR -- the standard review plan as well as change the standard tech specs.

So, that as time went by, the standard tech specs were somewhat different for the two units and, of course, we used the latest standard tech spec in issuing -- in preparing the Unit 2 tech, tech specs.

Other type of technical changes besides that would be things where they found in Unit 1 that there was a tech spec that -- one example that comes to mind is a, a time requirement on doing something when you have a rather low probability event. They learned, upon studying that more carefully and we learned, I guess, in developing the STS as well, that that time requirement couldn't possibly be met. And that time was changed. So, in Unit 2, we used the longer time interval. It still exists as a shorter time interval in Unit 1, but I'm sure that's part of the application that we now have in hand to change Unit 1.

So, that's, that's the breakdown. We, we would characterize them in four groups. We would prefer to be issuing this full power authorization

for Unit 2 in a situation where both tech specs were absolutely identical.

The licensee can speak to this. I spoke to him when I was at the site before about these differences. Their -- they thought about this.

Concerned about it. That's why they had a training program for the crews. They're convinced and we were convinced that, that given that they had a program afoot to bring Unit 1 up to Unit 2 in a reasonably short period of time, and as I say, they have made application for that, that there really is no safety significance to these differences. The operators are trained. They understand the differences.

a second unit at the time you're going to issue the full power license or certainly the low power license even, even worse, to have in conformance the first unit tech specs because you're evolving these tech specs quite often right up until the last minute, literally days before you issue the license. And any change -- any last minute thing you do on that second unit may cause a difference to exist between Unit 1. And then you catch up as rapidly as you can.

CHAIRMAN PALLADINO: Well, I would gather that about 65% of these or close to them will be eventually the same?

MR. PURPLE: I think if my arithmetic -CHAIRMAN- PALLADINO: I'm sorry -MR. PURPLE: All but 13%, 87 -CHAIRMAN PALLADINO: All but 13%, yeah -I'm sorry.

MR. PURPLE: All but 13% would be very

-- within a -- within a few months will be the same
because they have made application now, as I say,
for the -- for Unit 1 to bring it into conformance.
So, --

CHAIRMAN PALLADINO: Is it -- is there a frequent change, of interchange of personnel among the two -- between the two units? What I'm getting at, if a person is assigned to a particular unit and stays there awhile, he gets familiar with his. Then if he goes over to the other plant and he's going to be there for awhile, he gets familiar with those, but if you're -- if you're jumping back and forth, week to week, or something like that, it might be pretty hard to remember what the differences are.

Is, is there a plan to interchange these

-- often?

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MR. PURPLE: I guess that I would defer that to the licensee to ask because I don't know that detail, whether they have plans for that. Do you want to ask them now or --

CHAIRMAN PALLADINO: Yeah. I just as soon get the answer to that --

MR. PURPLE: Sure.

CHAIRMAN PALLADINO: -- now, and then we can --

MR. PURPLE: Sure.

CHAIRMAN PALLADINO: Do you have a question, Bruce?

MR. KENYON: I'm Bruce Kenyon, Vice

President, Nuclear Operations for Pennsylvania Power
and Light. We have a common control room and, thus,
the shift supervisor and the control room supervisor
are managing the station's activities for both
units. We are currently operating with four
reactor operators, nominally two assigned to each
unit, but they are frequently rotated, I would say
roughly once a week. They will shift from one unit
to the other.

So, it's our intention to maintain all of our operating personnel, fully cognizant of the

requirements on both units and move them back and forth frequently.

CHAIRMAN PALLADINO: So, it does become important for them to be quite familiar with the differences in specs, at least --

MR. KENYON: That's right.

CHAIRMAN PALLADINO: -- to the extent that their --

MR. KENYON: Our, our training programs do that. They are in -- they are in a training program once every five weeks, and we use the requalification training as an opportunity to make sure that the differences are understood.

CHAIRMAN PALLADINO: Okay. Thank you.

MR. PURPLE: That was all I intended to say about the differences between Unit 1 and Unit 2 tech specs as they exist today. I'm prepared with respect to these audits we did of the Unit 2 tech specs with a little help from behind me to go into any great detail you might want on the kinds of things that were found in the way of different discrepancies or whatever word is proper during these audits.

I can -- as a bottom line, both groups -no, I'm sorry. The EG&G review -- the EG&G review,

the contractor himself did not try to draw a bottom line. He simply said, I note that the FSAR says one thing, the tech spec says another. That --

CHAIRMAN PALLADINO: May I have some examples of --.

MR. PURPLE: Yes, sir.

CHAIRMAN PALLADINO: It may help/understand the significance.

MR. PURPLE: One would be the, the water volume, the maximum water volume in the suppression pool. The FSAR number for the maximum water volume in the suppression pool was one number, and the tech spec was a different number. So, they identified that.

It turns out --

CHAIRMAN PALLADINO: Yeah, how significance a difference?

MR. PURPLE: 1900 cubic feet. It was enough that we were going to change the, the FSAR. It turns out the tech spec was correct, as we look into it -- I mean why are these numbers different when you then -- just given that finding which is all the contractor did was say I note that these numbers are different.

It turns out that the FSAR was based on

a preliminary number and had never been brought up to date, the FSAR having been written several years before the tech specs were -- the tech spec number was based on the, the actual numbers used in the calculations and was correct.

The indicated action is that the licensee will in his annual update of the FSAR correct the, correct -- change the preliminary number in the FSAR to be the actual number. So, in this case, it's an example of where the tech spec was, was perfectly correct but the contractor looking through had no way of telling that. He simply said there was a difference.

CHAIRMAN PALLADINO: I gather that didn't lead to any significant change in either the analysis

MR. PURPLE: No.

CHAIRMAN PALLADINO: that they were involved --

MR. PURPLE: No, because the analysis -no, the tech spec was based on the number used in
the analysis, and it turns out that the FSAR number
where they were looking at it was just a preliminary
number. It was not the one actually used in the
safety analysis.

It's some of those kinds of things.

Another example where they would know the difference, the diesel fuel oil tank capacity. The FSAR had one number. They look in the tech spect, they find a different number. So, the contractor would say, that's a discrepancy.

We go to look at it more carefully and find that, well, what's, what's in the FSAR is a design number for the size of the tank, and the tech spec is the number, the minimum amount that has to be in the tank in order to declare the diesel generators operable. Those two numbers should be different and were.

It's that kind of thing. Now, there were some, some changes -- some discrepancies like the first one I mentioned, where having brought to the licensee's attention, he may have found that himself, but since we found it and brought it to his attention, he would correct the FSAR.

There were some that would cause -
a chain that caused the change to the -- to the

technical specifications themselves. In some of

those cases, those changes were already in process
in the dialogue, the normal dialogue between our

tech spec review group and the applicant outside of

the context of this separate contractor review.

out of all the systems, the -- for example, EG&G's look which was comparing the tech specs to the FSAR, they looked at 24 sections of the tech specs; and I'm not sure how many pages that is, but that's a lot of items, 24 sections, including emergency cooling systems, containment systems, electric power systems. It's very healthy section of the tech specs.

By the time they narrow it down to all of their noted discrepancies, they were talking eight items, and I've given you two or three examples of the kinds of items these were. There were similar kinds of conclusions from the -- from the Franklin Research --

CHAIRMAN PALLADINO: I'm satisfied -- MR. PURPLE: Okay.

MR. BERNTHAL: I guess I -- what I'd be more interested in hearing, I don't need much in the way of example or words, I guess, but the Chairman's question in a slightly different way.

And when you look at all the tech spec discrepancies and changes, can you pick out one or two that you consider to be the most important or significant?

And are those, in fact, the ones you've just told

us about or --

MR. PURPLE: Well, I didn't think of it that way. Give me a moment here.

(PAUSE)

MR. BERNTHAL: I mean one or two on the top ten is fine. You don't need --

UNIDENTIFIED SPEAKER: The statement that no significant --

MR. PURPLE: Yeah. It's kind of hard to -- it's kind of hard to take down the next set and pick out --

MR. BERNTHA: I'm just trying to get a sense for what we're talking about here. Is a class of thing we're talking about the number of gallons in the suppression pool and the fuel tank or is there a class that has a more significant ring to 1: than that?

MR. PURPLE: Not a class because we're really -- I said there was about eight items that were found in all that the EG&G people looked at. And out of the Franklin, there was really only one with a few recommendations. That one that was uncovered in the Franklin effort, and maybe I could ask Richard to fill this one in, had to do with the lack of quantatative criteria for limits which

setting.

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There are criteria in the FSAR and not in the tech specs, and I guess there's some difficulty in applying those criteria and something needs to be changed. That, I think, has gotten itself resolved now, but we're --

MR. STAROSTECKY: If I can address that later, but from my perspective in the region, -CHAIRMAN PALLADINO: Yes.

MR. STAROSTECKY: -- the answer is the equipment and the hardware that's installed is reflected in the tech specs, and we found time to get into other areas like the limits switch settings on the vacuum breakers. And I can address that later to give you a feel for what's involved, but it's, it's a good issue that has been overlooked for mark 2 containments (Phonetic) generically, and it's going to get resolved.

It's a straightforward matter, that people have the time to find it, but there is agreement between what's in the plant and what the tech specs require.

MR. PURPLE: That concludes what I had prepared to speak. I'd like to turn the meeting over to Tom Murley.

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COMMISSIONER ASSELSTINE: Well, before you do that, --

MR. PURPLE: Yes.

COMMISSIONER ASSELSTINE: -- I had a couple of questions on the license.

MR. PURPLE: Okay.

at the draft of Supplement 7, the SER, there was a statement on Page 1-2 under license conditions.

There was one issue for which a condition was included in operating license NPF-22, which required satisfactory resolution prior to exceeding 5% rated power.

Current status and section in which the staff evaluates this issue is shown below. You list the issue and you state that the status is resolved.

MR. PURPLE: There are more than one.

COMMISSIONER ASSELSTINE: Okay. So, that was my question --

MR. PURPLE: So there are more than one but only -- there's about three license conditions plus a few of the confirmatory items in the attachments of the basic license that refer to 5% power.

All of the others except this one are simply confirmatory kinds of things. In other words, the region goes and confirms that something was done.

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It's not an evaluation that needs to be done.

I worried about this myself when I saw the wording. I said, my goodness, this says there's only one, and there's really a half a dozen. What we meant in this SER was one that requires an evaluation in an SER. The rest are confirmatory and have been closed, either closed by confirmation from the region or confirmation from the licensee in a letter to us.

COMMISSIONER ASSELSTINE: Okay. So, I can assume that for all of these other items that were included in Enclosure 3, the license package, that all of those items have been done?

MR. PURPLE: All that needed to be done before -- yeah, before going to full power.

COMMISSIONER ASSELSTINE: So, qualification and documentation, ERC, AIC back-up power supply and invertor and all those other items have been done?

MR. BDO: And that would include -there are a number of others in there. I noticed
that were, were also prior to initial criticality
and I assume all of those have been done, as well.

MR. PURPLE: Yeah.

MR. PERCH: My name is Bob Perch. I'm

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the Licensing Project Manager. All the items that are listed as initial -- prior to initial criticality, or prior to 5% have been closed out, either via confirmation from the resident inspector or by letter from the applicant confirming that those items are, in fact, complete.

COMMISSIONER ASSELSTINE: Good. Thank you.

On fire protection. I think this comes under your -- in SSEk-1 on Page 9-2, your staff indicates that the licensee had committed to do certain -- regarding your appendix (Phonetic) -- however, then the staff says in the same section, upon completion of these modifications, we conclude that the Susquehanna Units 1 and 2 fire protection programs will meet the, the intent of Appendix R.

And I guess I'm still confused as to when we pick the intent and when we pick the letter of -- the meeting or letter of Appendix R. Could you explain what's meant by the intent here and why we applied intent here and not to other reactors?

MR. PURPLE: I'll have to say, no, I can't, but let me see if there's someone in the room who could.

Engineering for Tom. 2 MR. NOVAK: Tom Novak of the staff. I'll 3 offer one, again, sir. MR. PURBLE: What's that? 5 MR. NOVAK: That is that these plants, 6 Susquehanna Units 1 and 2, are not required to meet Appendix R regulation. This is a case where as an 8 NTOL, one, we look at the Appendix R plus the other 9 requirements that we think are necessary for an NTOL 10 plant. 11 So, I think the statement here is intended 12 to say it meets the intent of Appendix R, but that 13 may not be the only criteria upon which we would 14 judge the acceptability of the fire protection plan 15 for this unit. 16 CHAIRMAN PALLADINO: Then aren't we 17 requiring the letter of the law on operating with 18 -- operating licenses? 19 MR. NOVAK: Well, this is -- I think we've 20 talked about this before. My understanding is --21 CHAIRMAN PALLADINO: Well, it's a totally 22 confusing matter to me. 23 MR. NOVAK: And I don't think I can do 24 any better than the people who have tried it before, 25

CHAIRMAN PALLADINO: -- Division of

sir. If it -- if it were the -- as we look at operating reactors that -- where their operating license clearly falls under Appendix R, then the statement would be --

CHAIRMAN PALLADINO: No, I, I understand we have on several occasions, I've heard it said here, oh, yes, we're resolving the Appendix R questions, and it was one of the reactors where according to our rule or order, it didn't have to be. And now we come along with one where we talk about meeting the intent.

Maybe I shouldn't beat that horse here today, but it's one on which I think we need to have some clear and reasonably consistent approach.

Well, thank you anyhow, Tom.

UNIDENTIFIED SPEAKER: I think we-- I think we don't have the right people to attempt to give you that clear story here today.

CHAIRMAN FALLADINO: Well, it does -UNIDENTIFIED SPEAKER: We certainly can
do that, yeah.

CHAIRMAN PALLADINO: Okay.

COMMISSIONER ASSELSTINE: We are going to have a meeting on fire protection, right, fairly soon?

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CHAIRMAN PALLADINO: We have agenda planning coming up this afternoon.

COMMISSIONER ASSELSTINE: Yeah.

CHAIRMAN PALLADINO: Okay.

MR. PURPLE: Okay, Tom.

MR. MURLEY: We're going to talk from the region's perspective of the basis why we have confidence that the plant can be operated safely.

I'd like to start out with a few words about the management. We believe that PP&L is a very well managed company, and it's not often that we sit around this table and are able to, to say those good things, but the signs of good management are just about everywhere we look.

They have had strong control of the construction. They brought in good people from outside. They have a lot of depth in the corporation, depth with experience, nuclear experience. Their top management is, is knowledgeable about the plant and is involved in the plant. They periodically go there and review themselves.

We're told that at each Board meeting monthly there is a presentation given to the Board of the status of the operations at Susquehanna-1 and 2.

The SALP, Systematic Assessment of Licensee Performance -- in fact, I just completed the most recent one. In fact, I was up there with Rick Starostecky on Monday, going over the SALP, and they had systematically improved over the years.

In fact, Unit 2, now the SALP ratings were all, all one ratings. So, they've done very good. We find that they don't cut corners in the — in the construction in the operation of the plant. And just to give some examples, they've had a simulator, a plant specific simulator since before TMI, before they became fashionable. They have a first class emergency operations facility. And they've done a probabilistic risk assessment for the plant before Unit 1 started.

The training program is one of the better ones we see in the region, maybe one of the best.

And, again, the signs are everywhere that it's well managed. And this gives us confidence that they can run the plant safely.

In addition, we believe the construction quality of the plant is high. And our inspection program has verified this. And I'd like to ask Rich Starostecky to, to go through some of the details of the inspection program and why we draw

q

that confidence.

MR. STAROSTECKY: I'd just like to maybe give you some more detailed statistics to support bullet No. 1 which indicates that the inspection program is complete and actual requirements in licensee commitments are met.

And as Tom mentioned, PP&L has been a very responsive licensee. We've had a low number of open items and, in fact, were able to close them out in an orderly fashion.

Susquehanna Units 1 and 2 together have gotten about 26,000 hours of inspection time by NRC. We assigned the construction resident inspector to that site in September of 1978, and I believe that's the first site in Region 1 that received a construction resident.

A second resident inspector to help focus on preoperational testing was assigned in October 1979. We've had -- almost a continuous basis. There were some gaps and have had two resident inspectors at that site since then.

Unit 2 itself received over 8,000 hours of inspection time. There are an awful lot of common features between the two units, and that's where the bulk of the inspection program did go.

In 1983, Unit 2 alone had over 3,500 inspection hours. The -- part of the program that I think gives me an awful lot of confidence about the inspection program and what it's telling us is we have done several team inspections. And what I'd like to do is highlight three in particular to support what I mean by bullet No. 2.

CHAIRMAN PALLADINO: The, the new inspection program --

MR. STAROSTECKY: The NRC inspection program is current.

CHAIRMAN PALLADINO: Yeah. I had a question what that meant.

MR. STAROSTECKY: The NRC inspection

program is current means that the -- there are

requirements that the Office of Inspection Enforcement

Leys down and says these are what you have to go

look at and inspect in terms of the inspection

program, 2512, 2513. They have specific mod,

inspection modules that are done for each phase

of a reactor construction pre-up and start-up.

We, in essence, are satisfying, i.e., in terms of making sure that their requested modules are being done. Now, --

CHAIRMAN PALLADINO: You're saying they're

being done on a timely basis?

MR. STAROSTECKY: They have been done and are being done on a timely basis, consistent with what the utility is doing. In addition to that, we have done some other things, and that's what I'd like to highlight now.

In 1981, March of 1981 -- this relates
to Unit 1 which is already licensed -- in response
to a very poor SALP at the time, we had a team
inspection to follow up on quality assurance, design
control, construction control, maintenance and
surveillance over installed equipment. That team
inspection, as I say, involved about 350 inspection
hours.

(MR. HERZEL PLAINE LEAVES THE ROOM).

MR. STARTOSTECKY: And it highlighted to the region that the problems were not catastrophic, that, in fact, they could be corrected and subsequently were. That was the first team inspection.

In June of 1983 on Unit 2, the non-destructive examination van (Phonetic) with a team of inspectors was -- devoted over 600 inspection hours to independently, using NRC techniques and staff, radiographed 26 wells. We radiographed --

we, NRC, radiographed 26 wells, ultrasonically tested 64 anchor bolts, liquid penetrate -- tested 15 wells and did a number of other chemical analyses and hardness test of the material itself. The

bottom line is we didn't find any discrepancies.

In October 1983, we put together a team of people, recognizing that Unit 1 prior to its licensing, we had encountered some difficulties with small bore piping hangers and supports. And we put together a team to go -- do a detailed examination of several system that Unit 2, in particular, in terms of the design drawings, the interface between the mechanical, electrical, instrumentation, and we examined the systems. We actually walked down the systems and did a detailed examination of the as-built systems and compared them with the drawings, schematics, the FSAR and looked at all the interfaces each system had with piping, mechanical, electrical, instrumentation and so forth.

The three systems we looked at were the stand-by liquid control system, the loop B of the residual heat removal system, and the control rod drive system. We found no recurrence of any of the Unit 1 problems at Unit 2 in regard to small bore piping and instrumentation.

We checked and found no problems with the electrical, instrumentation and control wiring.

We reviewed 167 wells in the course spray RHR mainsteam and reactor water cleanup system that were

being used for the preservice inspection program.

To provide some perspective in all of this, we found that all the engineering drawings and all the dimensional comparisons that were made, that all the installed components agreed to what was in writing and we found no discrepancies.

We found some weaknesses, and we had three violations. We also found some shranks (Phonetic).

CHAIRMAN PALLADINO: Let's see. If you found no deficiencies, what were the violations -- procedural?

MR. STAROSTECKY: The violations may have related to records and documentation and corrective action that may have been required or lack of timely follow-up on it. I do not have the particulars in front of me now. If you want, I can get them for you.

CHAIRMAN PALLADINO: No, I just want to know the nature --

MR. STAROSTECKY: The thrust of what I'm trying to say is that we had no hardware

problems and yet there were some documentation problems, but when you look at 631 inspection hours and to come away with three violations, and all of them what I would call minor significant, is -- that's commendable performance.

Q-A problems that are described in the third paragraph of the construction Q-A write-up that we were given. It's Enclosure 6 of the package. Are they the same things you're talking about now and weren't they all on Unit 1 as opposed to Unit 2?

MR. STAROSTECKY: Yes, and I'll go into that in a little more detail later on. And this relates to some of the earlier SALP, but these were not catrostrophic Q-A program breakdowns, I think.

What we -- what you see there in that third paragraph were indications early on in terms of control in the 1980 time frame.

(MR. HERZEL PLAINE REENTERS THE ROOM) .

COMMISSIONER ASSELSTINE: Okay. I

guess I read it as continuing later than that,

particularly the sentence that says, but we found

the associated corrective actions to be acceptable

and the licensee's performance and -- quality to

be continually improving, but I didn't realize that

that's really all back in 1980 as opposed to anything that's occurred since then.

MR. STAROSTECKY: There have been some QATC violations since then. I don't want to mislead you on that, Commissioner, but that paragraph, I think, expands a four year time period, and I'd much rather go through some of the SALPs and highlights from the statements we made in the SALP.

But, yes, we have had some violations, and there always are violations at these plants with regard to documentation, lack of timely followup, things of that nature.

In November of 1983, we also had a team of people go out to Unit 2 to look, specifically, at the procedures that were being developed for Unit 2 and reviewed administrative procedures and instructions and had 260 plus hours and found no major problems, but, again, there were some violations and some inconsistencies, and they were cited.

That's all I would like to, to state on the inspection program other than we have taken the time to go independently look at some things ourselves, and the results are very favorable. And the inspectors continue to be on-site monitoring the

start-up program now.

CHAIRMAN PALLADINO: This slide, are you going to --

MR. STAROSTECKY: I'm going to continue on this slide. What I'd like to do is address

Item 3 regarding the SALP Report. The latest SALP Report covered the period of February 1, 1983 to -- through January 31, 1984. And we issued these about a month ago and had a meeting with the utility on-site just this Monday.

For Unit 1, there were six category one areas and three category two areas. In Unit 1, we reviewed as an operating plant and addressed those items particular --

Unit 2 received a separate SALP Report.

We did a separate report for Unit 2 in the light of its different activities, and we had seven areas addressing construction and preoperational testing. They were all Category 1. And that's the only time I seen a SALP Report -- construction facility has so many Category 1's.

Four SALP reports --

COMMISSIONER ASSELSTINE: I guess they get too many operating facilities that have that many category ones, either. MR. STAROSTECKY: And if they get one, they, they usually wind up slipping down.

CHAIRMAN PALLADINO: Well, when there's -- is the only way to go.

MR. STAROSTECKY: The four SALP reports

I'd like to just briefly highlight. The first
one covered the period January 1, 1980 through
December 31, 1980. This was the first -- one of
the first SALP approaches, and they had something on
the order of 20 functional areas that they looked
at.

One area was above average. Eighteen areas were found average. Quality assurance was below average. And the SALP came down pretty heavily and addressed PP&L deficiencies and Q-A.

CHAIRMAN PALLADINO: That was on 1 or

MR. STAROSTECKY: This, at the time, was construction. So, we, in essence, looked at Units 1 and 2 as a construction site, both. And, so, we had one SALP Report, a report to cover both. This provided the emphasis for that first team inspection that I, I mentioned go out and look at the problem.

Subsequently, in March 1,'81 through

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February 28, 1982, was the period of second SALP.

There were no Category 3s. There was improvements in the Q-A area. And eight Category 2s and one Category 1.

The first time I noticed that overall responsiveness is noted as a strike in this SALP Report of the utility, that they have taken conscientious steps to respond to the deficiencies identified in the previous SALP. The third SALP Report covered the period February 1, 1982 through January 31, 1983. And this was the first time we split Unit 1 from Unit 2 and we, again, addressed two separate SALP Reports.

From the construction standpoint, Unit

2 had two Category 1s and three Category 2s. So,
that's a plant that's doing about average. And as I
indicated for Unit 2, the latest SALP Report out of
the old Category 1 is a marked improvement.

On the Unit 1 standpoint, the SALP for the February '82 through January '83 period, they had five Category 1s and three Category 2s. This latest SALP for Unit 1 has six Category 1s and three Category 2s.

So, there has been a steady improvement in SALP. The SALP themselves quantatatively -- I'd

like to maybe summarize some of the thoughts the staff has expressed in summarizing SALPS for the latest year.

The management involved in the -- in the latest SALP is viewed as a real strike, the management control, but when you go back and read the initial SALP, the initial SALP identifies a lot of areas and even more direct licensee involvement in and support of QA -- increasing the scope of Q-A activities, demonstrating fulfillment of design criteria during preoperational testing, responsiveness to NRC findings, preventive maintenance of equipment turned over to the plant staff and quality of submittals to the NRC. Those were the deficiencies that were identified four years ago.

As the SALP progressed, the deficiencies were individually corrected and other items were identified as needing some attention but they were much lower significance.

In summary, from the -- for the SALP area, one of the outstanding attributes the staff has identified is the self-identification of problems on the part of the licensee, responsiveness to the NRC and the attitude towards the quality and safety in that they will take the time to do the job right. They don't skip corners.

There is a strong emphasis on training,
and the training has been very much improved over
the last four years than it is possible. Unless
there are questions on SALP, I'd like to conclude at

5 that point.

COMMISSIONER ASSELSTINE: I guess I just have about three questions on the -- on the SALP review. To what extent -- I understand the, the usefulness of having SALPs for individual plants.

I guess I question a little bit having individual SALP ratings for individual units at plants, particularly, where there -- for example, in this case, where you cost license to operators. Is it really possible to differentiate between the units, to what extent, for example, do they share not only operators but non-licensed people, maintenance people, those kinds of things, so that you really get a clear distinction between the two units.

MR. STAROSTECKY: This is an artificial -the use of SALP for two units is an artificiality
we've introduced only during the period when they
had different stages of construction and operation.
Because we prepared separate SALPs for both units,
we were able to use those SALPS to give guidance
to our inspectors on Unit 2, look at this area more or

look at this area less. We're using SALP as a management tool in that regard.

We won't have another SALP for Susquehanna that addresses both units. It will be one SALP for both. You're correct, it doesn't make sense to write a separate one for each, but when one is in operation and one is in construction, there would be different inspectors that would look at it.

commissioner asselstine: Okay. The second question that I had, and I think you may have already addressed it, was -- I don't want to take anything away from the licensee in terms of its performance and the -- and how its operating, but the one question I had was comparing the, the quality assurance construction Q-A write-up with the Category 1 rating.

I take it your view is that whatever deficiencies or problems there have been, particularly in the past year or so, they've really been minor, minor items, and they fully wanted a, a Category 1 rating --

MR. STAROSTECKY: That is correct and, in particular, when we found that the problems on Unit 1 were corrected, not only Unit 1 but we didn't find them on Unit 2, and that is very -- I think

a very positive indicator.

COMMISSIONER ASSELSTINE: The last question

I had had to do with an item I, I think you'll get

to in a few minutes, that is the list of enforcement

actions. I noticed that there, there have been a few

of those, particularly on Unit 1, and most of those

still seem to be open items where action is still

pending.

And I wondered to what extent when you, you took those into account in the SALP ratings, particularly for Unit 1.

MR. STAROSTECKY: On Unit 1, those enforcement actions did affect the SALP ratings, and they did reflect Category 2 of the plant operations area. And I think we, you know, we'd like to address that in more detail as we go along.

COMMISSIONER ASSELSTINE: Okay.

MR. STAROSTECKY: I would just like to highlight, Unit 2 enforcement history has not been substantive. Since 1981, we have had 14 -- Level 4 violations and nine Severity (Phonetic) Level 5 violations. That's extremely small for a construction plant. And with two residents being on site and the humber of hours we spent there, I was very much impressed by that kind of enforcement for

Unit 2.

CHAIRMAN PALLADINO: What are more typical average numbers or don't you -- you said they're very small.

COMMISSIONER ASSELSTINE: I -- 3s have been fairly rare until the past couple of years, hadn't they, for construction site --

CHAIRMAN PALLADINO: For construction site -listing numbers of violations?

MR. STAROSTECKY: 4s and 5s, you know. On construction sites I would say a dozen 4s is not unheard of on a construction site per year.

CHAIRMAN PALLADINO: And whether they have

MR. STAROSTECKY: For the 4s since 1981, they had 14 Severity Level 4s and nine Severity No. 3's.

CHAIRMAN PALLADINO: Okay. Thank you.

MR. STAROSTECKY: The emergency preparedness situation at Susquehanna -- as Tom mentioned, the facilities are in place. They have got good first class facilities and we have observed the exercise at Susquehanna and, in fact, Region 1 does participate in exercise with the State of Pennsylvania. We have not yet participated with Pennsylvania at Susquehanna

and that would remain at some point in the future.

CHAIRMAN PALLADINO: Do you see my observations parallel to yours or would they be different?

MR. MURLEY: I don't think we've got

-- report yet, but my understanding is that there
were no significant findings. If there are, of
course, we'll let you know. Our findings of the -of their performance on-site were good.

MR. STAROSTECKY: All right. Going on to Viewgraph 10, the Unit 2 operating history. What I'd like to do is expand on this viewgraph a little bit and go beyond these points and address construction QAQC to some extent.

I would simply point out, as Unit 2

-- initial criticality, the plant had been in a

stable condition. There have been no -- the

construction QAC program, as Unit 2 has been the

same, is that for Unit 1.

One indication of the licensee approved, licensee involvement in construction at Unit 2 has, has been the number of not only managers on-site but also -- we also tend to look at stop work orders as a case in point.

There have been on the order of 38 stop

work orders issued at Susquehanna, 16 by the -engineer, Bechtel, 22 by the licensee. And of the
licensee, not only do we just have 22 stop work
orders, but they were issued by a variety or organizational entities, the three of them being the, the
construction organization, the corporate engineering
organization and the operations department is even

In terms of audit, PP&L has had a total of 384 audits of the Susquehanna site. 340 of those 384 affected both units. Unit 1 had eight audits.

Unit 2 had 36. That was just PP&L -- quality department. Bechtel also did audits.

In terms of third party reviews, the licensee has had several third party reviews done. I would just like to highlight two. One of them was a Teledine (Phon.) effort that was done in support of Unit 1 licensees regarding the independent design review of the main feedwater system. And that indicated no problem.

EG&G also did a review of the advance control and design and examined the engineering documentation and project controls, QAQC aspects.

As you may know, Susquehanna has a rather interesting control room, a design --

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One of the items that was interest -- of interest to us was that in 1982, there was a problem identified at another site relating to the enhancement or ratographs (Phon.) by ITT Grennell (Phon.)

PP&L·inspected or reinspected 17,500.

radiographs for Unit 2 in July/August 1982 time

frame before IA issued its bullet in 8201. The

results there were that they found evidence of

falsification on ten records, and they found 62

cracks (Phon.) inclusions and other indicators that

required some corrective action. They did, in fact,

correct these deficiencies and were able to

address the problems in a very expedity (Phon.)

schedule.

I simply mention that because the -- at the time we had our resident inspectors mention it to the construction sites and to have a utility respond in this matter --

CHAIRMAN PALLADINO: Rich, you raised the question. Is there any question here on typical pipe cracks -- or do they -- do they have desensitized steel in this plant or --

MR. STAROSTECKY: They've, they've got two things. They've got the different materials and they have done the induction --

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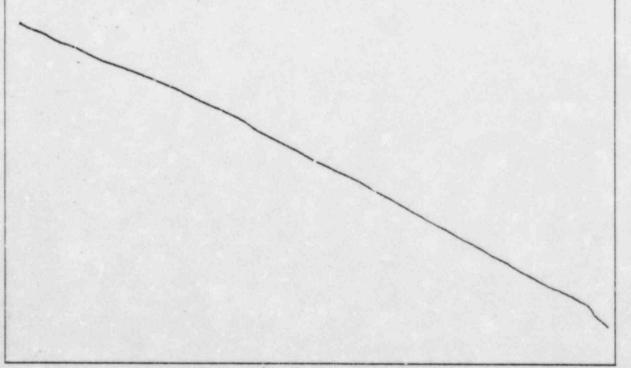
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MR. PURPLE: They have, although they haven't completed all of it. We have a schedule to complete all of that during the shut-down just prior to commercial operation later on this fall. I think there's something like 25 more wells yet to be inspected.

CHAIRMAN PALLADINO: They do have the desensitized stainless?

MR. STAROSTECKY: Either the desensitized stainless or the -- induction heating that have replaced the safe ends which were -- which were bad. The licensee could simply fill us in in a lot more detail if -- more on that. We are satisfied with -- that we feel should be done in that area prior to issuing even a lower power license.

(END OF TAPE)



## PROCEEDINGS

MR. STAROSTECKY: My recollection is that they have the both, the desensitized material, and they were in the right, starting of the program on the induction.

CHAIRMAN PALLADINO: Well why would they induct, the -- the induction heating of desensitized material. May-be a representative from PP & L elp us.

MR. CRIMMENS: My name is Thomas Crimmens I'm manager of -- Engineering for PP & L. From early, early on in the investigation of Intergranular Stress Corrosion Cracking, PP & O has been involed in taking mitigative action on Susquehanna. In addition to the replacement of the safe end switch, as was already mentioned, there have been other pipe replacements with the superior materials, that have been developed over the years. More, less sensitive materials due to granular stress corrosion cracking.

In addition, where applicable, we used the improved welding techniques, and also induction at each stress improvement IHSI, on sensitized materials.

On Unit One, we have yet to conduct the IHSI but it will be conducted during the first refueling on it which is scheduled early 1985.

On Unit Two, we managed to treat a hundred and four wells prior to fuel load, and have twenty about twenty-five or so remaining which we are going to catch in the

outcoming outages, late this year or early next year.

CHAIRMAN PALLADINO: Okay, Thank you.

MR. STAROSTECKY: If I could move on to slide 11.

(SLIDE 11)

ME. STAROSTECKY: The first allegation relates to penetration. It's an allegation we received anonymously In March of 1983, and it's an allegation that was I think, principally effected Shorem at the time, and we also addressed it at Susquehanna.

COMMISSIONER BERNTHAL: What's Biscoe?

MR. STAROSTECKY: Biscoe's the name of a manufacturer, and they manufacture and install felxible boots around pipe penetrations, that go through floors and walls, and the allegation anonymously stated that there was improper installation of these devices, it's a flexible material, a rubbery like type of material, and that is clamped to the pipe and then to that penetration itself, and they were improperly installed, insufficent measurements were done, and the material that is supposed to be put inside the seal, for fueling purposes, was settling out, and did not perform it's function.

This allegation effected an area that was specifically looked at in an inspection report at Susquehanna in 1982. In August inspectors has specifically reviewed this area, and had found every was acceptable, with the as Built

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inspection and the QC inspection. The item for all intents and purposes was closed in 1983. Inspectors in the regional office re-opened this matter, when finding the issue earlier this year, we in fact, did, refact, re-inspect the seals themselves and have found no problem and we're pursuing documentation of the shielding effectiveness of the aggragate material. We have not yet prepared an documentation, to close out completely the issue, but for all intents and purposes it is my judgement the issue is settled and resolved and we do not have a problem.

CHAIRMAN PALLADINO: Is the allegation from a past worker or?

MR. STAROSTECKY: The allegation was from a Biscoe worker apparently at the Shorem site. We are also pursuing this ame allegation at Shorem.

COMMISSIONER BERNTHAL: The allegation was from a worker at the Shorem site?

MR. STAROSTECKY: Biscoe had a contract for both Shorem and Susquehanna to install these boots, the -- seals

COMMISSIONER BERTHAL: But the worker had not worked at the Susquehanna site?

MR. STAROSTECKY: He had not worked at the Susquehanna site. That, I should not say that, I do not know whether he had worked at Susquehanna or not, the allegation was received by an inspector but the documentation I've seen

I don't recall it was that specific but he says it applies to both, and he would not give us his name and address, and we have not been able to do follow up. We've looked at the program, it statisfies us, we're looking at the details, it statisfies us, and asked the licensee to do another inspection on their own and to examine the settling record themselves, there is no problem here because to my mind functionally the seals are performing their job, now, we can maintain a differential pressure. The shielding is there only for a post accident environment, if you have a large release of radioactivity, and you would do a survey to look for streaming effects, even before you let people go. So it's not any immediate safety problem.

The second allegation, NR has documented and it relates to the effectiveness of the wet well design, Brad did you want to address that?

MR. PURPLE: Well this had to do with a, the input sources that are used to do an analysis of chugging loads in the supression pool. A former employee of the VECTO Corportion expressed concern that a different series of computer algorithm were used or a type of computer algorithm was used that went beyond, used beyond it's capabilities, and therefore you couldn't trust the results.

The staff did look at the allegation, went back and determined what had been used took a look at the difference

between the two models that were used, determined that the model that was used, although different then the other one, bounds, in a safety sense all possible load combinations and concluded in the bottom line that the methodology that was used was alright.

Related to this, is an inquiry regarding possible discrimination against this employee, for having brought this issues up. OI is looking into this as an inquiry at the moment. But we believe since we're talking about a VECTO Corportion thing, and not the operating licensee it's not particularly pertinent to the decision here today.

CHAIRMAN PALLADION: I was going to ask you, are there any other items referred to OI?

MR. PURPLE: That's the only one I'm aware of.

UNKNOWN: That's correct Sir, that's the only one
we have.

COMMISSIONER BERNTHAL: Is there anybody here besides me, who doesn't know what a chugging load is?

MR. MURLEY: Yeah, you, basically it has to do with the condensations of steam condensers in the pool. You get loads that oscillatelike that. They turn into chugging load.

COMMISSIONER BERNTHAL: I see.

MR. MURLEY: Your technical assistant is an expert on that so he.

MR. STAROSTECKY: By the way I would just like to mention that the BISCOE seals are not used on any primary containment reservations, just refers to the reactor building and -- So there's no impact on the dry well or the suppression chamber. If I could, go to Slide twelve.

(SLIDE 12)

MR. MURLEY: This is the enforcement history that Commissioner Asselstine referred to. There have been, six enforcement activities on Unit One and Two over the last 15 months. This is an item that troubled me a bit, in fact, trouble me a lot, and I tried to find out what's the reason for this high enforcement activity, on the one hand we're saying that we think the PP & L is a well managed utility, on the other hand we see all this enforcement activity.

I don't have any conclusive answers to this. But what I'm tending to conclude I don't like the answer. The reason we, we don't find a common thread through these enforcement activities, that is, it's not poor training, it's not, it's not a singled out in a single group or a single individual or anything like that.

We don't find a common thread, except the following and that is these recent plants that we've licensed just
in the last few years, have become very complex, and the
technical specifications for Susquehanna are much, much more
complex, then the older beat up --. And this has come

about since Three Mile Island, it's the natural result of, I think, of it, adding this complexity.

Just to give you an idea we have over three thousand procedures, roughly three thousand seperate procedures that have they to follow on Susquehanna One and Two.

This is a large factor higher then the earlier BWR's that we have in the region. I think, and we're finding the same thing at La Salle as amatter of fact in Region Three, it's not unique to Susquehanna.

La Salle is I think, propably the first BWR licensed since Three Mile Island, and Susquehanna's the second, so we have this history and one finds that for La Salle there's been seven enforcement activities in Two years there.

That's higher then we're used to also. I guess the bottom line that I come to on this is.

COMMISSIONER REOBERTS: Well you've given us a number, three thousand procedures, what, give me some numbers for much earlier licensed BWR.

MR. MERLEY: Well it might be only a few hundred. So it may be a factor of five to ten greater.

COMMISSIONER REOBERTS: Would you make me observation of which plant might safer?

MR. MURLEY: Well I don't know, because these procedures reflect improved hardware, so I have no qualms in saying that the hardware of Susquehanna, I think, makes it a

safer plant then, then a plant that was licensed ten years ago. But the fact it's gotten so complex in terms of having to operate it, I'm not sure that that's safer. And I don't think we've really done enough study or got enought experience on these plants to be able to say. But it certainly causes us concern yes.

So whereas I don't think we would regard any of these specific enforcement activities as particularly major safety voilations, I think it's something that we can propably come to expect, with these complex tech spec and procedures, with their current enforcement policy.

CHAIRMAN PALLADINO: Do you have enough experience to know whether the situation improves as time goes on, or is it more complex then that?

MR. RURLEY: Not really but you can see, Unit One, it, it hasn't stopped we're still seeing them.

MR. STAROSTECKY: If I could provide some perspective on Unit One, when you look at some of these events there's a mixture. The February '84 event regarding exceeding the 150 pound pressures, that's a technical specification interpretation problem. You have to go to two or three places in the technical specifications, you eventually figure out you can't really exceed the 150 pounds, in certain conditions because you wind up changing conditions when you go over that limit, and that's an interpretation

problem. The individuals at the time knew that high pressure cooler injection system would not operate but they exceeded the 150 pound pressure. So it's an interpretation question that results in an LCL Voilation.

The second item is a personel error because drain valves were left open, so we're not talking about major system misalignments, we're talking about completeness of procedures and making sure the drain valves are included.

I can go through the rest of these and I can say a specific examples you have to get to that level or detail. We, in Region One, I think have lowered our threshold in Susquehanna in looking at these kinds of problems and have tried to understand is there a trend here. I think that's what Doctor.

CHAIRMAN PALLADINO: What is lowered your threshold I didn't follow that.

MR. STAROSTECKY: We could have in October 1983 for the violation that we had, issued a severity, level 5, violation and forgotten about it, and just looked for the corrective action.

CHAIRMAN PALLADINO: So what did you .o?

MR. STAROSTECKY: Instead we looked at that and we found that in the very next report we had another violation, and we had an enforcement conference scheduled, to discuss why we had two or three series of events occuring in

such rapid succession. The alternative option to us was to issue a severity level four or five violation, and get corrective action.

COMMISSIONER BERNTHAL: Tom I want to go back just half a minute to comment three thousand procedures versus whatever it was, three or five hundred. If, if it's true what I think you're implying here, then you ought to seek some sort of simple linear correlation between the number of enforcement actions, the number of violations that we see, now compared to the numbers that you saw earlier, is there any evidence that that's the case, that it's just a direct proportionality?

MR. STAROSTECKY: I don't think that it will be a direct linear relation because one has to take into account the quality of operation, and with, if you're comparing let's say the Peach Bottom Plant with the Susquehanna Plant you have to consider that they're different utilities and different operators running the plant, so I think if it were just simply the number of procedures it propably would be linear.

COMMISSIONER BERNTHAL: That's what I'm asking you.

MR. STAROSTECKY: Yes, I think for a given type of operation, given utility, given set of operators, the human error rate would be more or less constant. If you've got

three thousand operations to do instead of three hundred you're going to see that many more. They give us an example.

COMMISSIONER BERNTHAL: Somehow, well somehow that's disturbing. They're missing something in the development of these additional systems and in automation or something, it seems to me.

MR. MURLEY: I think it's something that bears looking into yes, because I don't see signs that they're getting less complex, if anything the tech specs are getting daily almost more complex.

COMMISSIONER ASSELSTINE: Tom, I notice on four of these items, for Unit Two, the enforcement action is, is still pending, a couple of those, the October and November one, are getting farther back in time now, when do you expect to, I take it that means you haven't made a decision yet on what enforcement action to take.

MR. MURLEY: Partly the problem, as Rich alluded to as we were rapping up what we decided to do on one, another would come along and as we'd get there yet another one so.

COMMISSIONER ASSELSTINE: So you ten to look at them as a package?

MR. MURLEY: Yeah we were looking at them really now, all of these as one package, and I think we're, we've sent some work into headquarters, and IME staff is looking

at it now.

COMMISSIONER ASSELSTINE: Is it fair to characterize these as basically greater attention to detail being
needed, focusing in on, on the details of their requirements
Ex-spec, LCO's, and just insuring that those are adhered to?
Or is it?

MR. MURLEY: Again, I don't see a common thread, if it's anything, individual errors, not the same individual obviously and when we look into detail on this latest one on Unit Two for example, the Resourse Range Monitor Channel function was by-passed, the person, or persons involved, are generally good operators, and they scored high or tests and they don't make mistakes frequently. Here they made a mistake, and I, we simply can't rule out human error it's going to happen, and again I get back to the complexity issue, I just wonder.

MR. STAROSTECKY: I don't believe that attention to detail characterizes it properly, it goes beyond that. There are anomalous situations and interpretations of the footnotes, and what I would call attention to detail in another plant I would not characterize it the same here.

COMMISSIONER ASSELSTINE: Do you think that these kinds of problems are inconsistent with what one would otherwise conclude say by looking at your last South evaluations. I read the South evaluations basically as this

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is a truely outstanding performer across the, across the board, and this would seem to indicate that while that may be true there may be some problems there that still need to be fixed.

COMMISSIONER PALLADINO: I think in addition to the complexity of the plant I think there's also complexity in our rules and regulations, you described on where you have to read three different places to identify that you weren't supposed to go above a certain pressure, and maybe that's something we need to give attention to ourselves.

MR. STAROSTECKY: I, I would just add one more item and that is there were a series of problems on surveil-lances and we had a management conference with this utility to talk about missed surveillances. And I was very disturbed at the time why are these thing occuring, first, what I thought was personnel error, and so you sit down and look at what controls the surveillances and it's the tech specs again, and the large number of surveillances that have to be done. That you have to sometimes put into perspective what is that's missed versus, what is that has been done properly, and what does it mean when you miss one or two or these. So yes we have had a series of meetings and some people would say yes, that this is a learning period, but I don't think we're dismissing itand I think as Tom indicated

5072 reports, how many reactos trips. In general concluded that Susquehanna units are right in the average of everyone else in the same period of time. For example if youlook at six selected plants during their low power license period, between low power and getting full power authorization, you find numbers for LER's that would run like 12, 14, 18, 19, Susquehanna one of two that have 12 and 6, respectively. They're all in the same ball park.

Reactor trips, Susquehanna one, if you looked at Calender year '83 they had 14, if you look at the period between May of '83 and May of '84 bringing us rightup to day they had 10.

The average for plants in their first three years or less then three years of operations, and there's 12 of those that we looked at, during 1983 the average trip rate was 13. This unit was somewherebetween 10 and 14 wherever you see it, so that their experience here has been nominal.

You were through Tom?

MR. MURLEY: I just want to, you wanted to touch n that.

MR. PURPLE: What! that?

MR. MURLEY: Vacuum breaker loader switches.

(SLIDE 14)

MR. STAROSTECKY: Well slide 14 is our conclusion slide, but, well when the staff concludes that the licensee

has satisfied all the requirements for issuance of a full power license, of course that does somewhat hinge on the Commissioners consideration of the financial qualification issue.

CHAIRMAN PALLADINO: I gather we have the license clear, maybe we ought to hear what they's like to say at this time.

MR. KENYON: My name is Bruce Kenyon, I'm VicePresident of Nuclear Operations for the Pennsylvania Power
and Light Company. I'm please to have the opportunity to
address the commission on the occasion of your review of
PP & L 's readiness for Susquehanna Unit Two full power
license.

In attendance at this meeting are also John Caufman, our Executive Vice-President of Operations, Jack Calhoon
our Senior Vice President, Nuclear, Norm Curtis Vice-President of Engineering and Construction, Charlie Roslie our
Senior Vice-President, Finance as well as many of our Senior
Nuclear Managers.

We believe PP & L is excellently prepared to safely and competently complete the start of testing of Susquehanna Unit Two, and manage the Unit into commercial operation.

This conclusion is based on two fundamentals.

First our success in operating Susquehanna Unit One, and secondly our Unit Two state of readiness, particularly in

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comparison to Unit One, at an equivelent point in time.

I'll briefly elaborate on each of these points.

With respect to our success in operating Unit One, briefing
One Personnel have already provided a fairly extensive review, I will just highlight the following.

Our Unit One start of test program, now I'm referring to the receipt of an operating license, to the end of testing was completed in 8.4 months. This is 22 percent less time then the 10.8 month average of the nine previous BWR start-ups all of which were pre TMI.

Also using the same comparision basis these nine previous BWR's the start up was completed with 39 percent less unplanned reactor shutdowns.

With respect to the one other post TMI, BWR to reach commercial operation, this was LaSalle unit One, our start up time was roughly one half of theirs.

Unit One was declared commercial on June 8, 1983, from that time to the end of 1983 a capacity factor of 67.5 percent was achieved, as such it ranked sixth out of twenty-four domestic BWR's and this is in spite of a shut down in December 3rd, to commence an extensive outage to intertie the two units in preparation for Unit Two start up.

The tie-in outage was was a very challenging outage for us, we had over two thousand work activities to accomplish and over one hundred design changes, almost im-

mediately follwing that outage it was necessary to conduct another outage to make a repair to the discharge valve in the reactor recirculation system, this was a difficult repair in the sense that the valve had to be maintained closed while we accomplised a stem ring replacement.

That went very well, particularly because we benefited from LaSalles experience where they had had to do a similar repair, somewhat ahead of us.

Since that time, this the start up on that outage which was on March 23rd, Unit One has been at essentially a hundred percent power.

So over this period of time we've seen good operations, we've also tested our outage management and work process skills and these have done well.

So we're very please with this start-up and initial operating record of Unit One, I believe this is supported by the very favorable comments received in the South report.

With respect to Unit Two, in preparing operating in preparing to operate Unit Two, we believe there's been considerable benefits derived from our Unit One experience. The time difference between the wo units has been approximately 18 months, and in our opinion this interval worked very well. We were able to accomplish a smooth transition of engineering and construction personnel from Unit ONe to Unit Two, and were thus able to keep the same people involved.

in the project, it was a good continuity.

This also gave us sufficent time to incorporate many Unit One design and construction lessons into Unit Two and this had just been referred to previously.

Similarly our testing personnel have had time to incorporate improvements in the Unit Two testing program, and with respect to this interval I think frankly it would of been very difficult to accomplish it on a much shorter interval and still do justice to the Unit Two pre-operational testing program as well as the power and assention and commercial operation of Unit One.

As a result of these efforts Unit Two is in a much higher state of material readiness then was Unit One at an equivelent point in time. There's a substantially lower remaining number of construction open items.

The preoperation testing program was accomplished in less then half the time it took on Unit One, partially because we propably started the program too early on Unit One, partilly because they were common systems that had already been tested.

But as a result the number of test exceptions is also substantially less. Since receiving our low power license, we've moved very well to the, to the start up program, we have a milestone schedule that takes us through commercial operation at the end of this year.

At the beginning of fuel load, we are a couple days behind schedule at the end of loading fuel we're about eight days ahead of schedule, with initial criticality, we're thirteen days ahead of schedule, and we hope to synchronize the generator roughly a week ahead of schedule, so we're moving well with repsect to our program.

CHAIRMAN PALLADINO: When would that be?

MR. KENYON: Generator synchronization has been scheduled for June 22nd, we hope to beat that by about a week.

CHAIRMAN PALLADINO: When you say synchronization what -- have to do?

MR. KENYON: What we have to do before that is to complete the testing necessary to go above five percent power. The major events after that are rolling the turbine up to rated speed. Doing some turbine testing, doing some generator testing and then, which is done up to about 20% power and then shortly thereafter we synchronize.

CHAIRMAN PALLADINE: What's your best guess as to when you'll be ready to go above five percent?

MR. KENYON: As was mentioned earlier, our moninal schedule is to be ready to go above five percent in the vicinity of June 4th or June 6th. The major testing that is left to do is a testing and grooming of the Hipsee Control system we've allowed some time in that schedule for problems

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in doing that, it's conceivable that that could go very well and we would be ready sooner then that. Also as was mentioned earlier we have one valve in the RHR system which appears to be leaking excessively, we're still lookingat that if it turns out that we have to repair that valve that will extend the schedule from five to seven days roughly.

CHAIRMAN PALLADINO: Five to seven days?

MR. KENYON: Yes. So there is really very little in the way of testing and perhaps this one valve repair to do before we're ready to go above five per cent power.

CHAIRMAN PALLADINO: Thank you. You don't have to do TDID tests?

MR. KENYON: No we do not.

COMMISSIONER BERNTHAL: Think he's just saying there must be something wrong here.

MR. KENYON: I've talked about our material readiness, briefly address our organization personnel, reference has already been made to the strength of our management organization. We're very proud of that, we went to considerable effort to acquire very experienced Nuclear managers, ones that also had very sound management skills, there is not a seperate organization for Unit Two, there's the same management organization, the same workers, the technicians the operators, will operate and manage both units. So we have the same team, it's now even more seasoned, I think

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this might be the appropriate time Commissioner Asselstine, to address your question on operator experience.

We have a combined control room, and thus the shift supervisor and the control rool supervisor are individuals that manage the activities on both units.

A reference was also made to an assistant unit supervisor, that is a position that is not required by the plant technical specifications. As far as I know we're the only licensee that has a supervisory individual outside of the control room.

With respect to the indviduals required by tech specs and specifically the shift supervisor and the SRO, in the control room, both of these individuals for all shifts are orginial licensed unit one personnel.

A couple of, in looking at that table that was shown the couple of individuals who have less experience are former SDA's who are recently licensed, and are functioning in this auxiliary assistant unit supervisor position, outside the control room.

So our control room experience is very good, in those top three positions we have at least five and a quarter years, this is combined now, of hot operating license experience at Susquehanna.

We have the technical specifications require three reactor operators, we are currently operating with four per

shift, nominally two assigned to each unit, two of the reactor operators are original licensed on Unit One, one was
licensed roughly a year ago, and the other was licensed
roughly recently. So in terms of the three reactor operator
required by tech spec they all have at least one year experience.

Again looking at the combined number we have almost five years of hot licensed experience at the RO level, on each shift in the control room, so we think our, as you would expect for a second unit that we think our experience our situation is very good.

COMMISSIONER ASSELSTINE: Thank you.

MR. KENYON: The various managements programs and procedures to contol activities on Unit two, are clearly the same for both units. They were developed on Unit One, they've been refined, and incorporated numerous improvements.

I beleive that the quality of our preparations, again talking construction completion, and our procedures our organization and personnel, the quality is reflected in Unit Two South report which has been mentioned previously where we got all catagories ones.

A question was, or discussion took place earlier with regard to our technical specifications. Our Unit one technical specifications were developed based on BECTAL GE and particulary PP & L, extensive review. They have been

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in use since we, since we received our license, back in July of '82, and we feel our experience with those Tech specs, is very good. We've had a relatively few number of changes to deal with plant modifications, the need to tie in common systems, NRC requirements and so forth. So we feel good about the Unit One tech specs.

With respect to Unit Two, we did an extensive review of the differences etween the unit one tech specs and the unit two tech specs, the differences have already been characterized, we feel, as a licensee, that the differences are, are relatively minor, our personnel have been trained on these differences and we are not really concerned about having to operate for some small period of time with these differences in the tech spec. They are mostly administrative in nature, or well understood design differences.

In, in summary we feel that we have proven organization and programs to start up and operate unit two. We have substantially fewer construction open items and test exceptions, and this unit's in a high state of materials readiness and we're very much ready to complete what we have to do to go above five per cent power and go through an orderly program to a hundred percent power and commercial operation.

CHAIRMAN PALLADINO: Okay Thank you Mr. Kenyon, any questions?

with particular attention to understanding and control of evolutions and the progress in abnormal conditions.

We have an independent safety assessment group.

We asked that group to do a round the clock assessment of what's going on in the control room, over a period of five days, with particular attention to watch relief, log keeping responsiveness to alarms, we brought in some consultants who are assessing the control room environment.

What we're looking for here is whether or not there are any factors in the control room, in terms of how we do work or the general environment, which, unduly detracts the operator from his fundamental responsibility. We are intending to make visits to other plants to identified by IMPO as having exemplary control room watch standing practices, to see if we can spot any, any differences there.

IMPO which has previously looked at operator watch standing as a portion of it's plant assessment has agreed and is now, doing a special assistance visit for us to see if they spot anything.

And in the possibility that we are missing something in identifying root causes of, with respect to human error we have volunteered to be one of six or seven plants piloting an IMPO human performance evaluation program, a portion of which is a very meticulous approach to the investigation of incidents involving human error.

COMMISSIONER ASSELSTINE: I guess not, only I, you will obviously have to respond at some point to the enforcement items that Region One people mentioned, I don't know if you want to make any comments at this point or not, I'd just leave it up to you, whether, whether you see a common thread in those items?

MR. KENYON: In looking at the past enforcement conferences with respect to the last four, and particularly the first three of the last four, in reviewing those incidents and not, right now trying to go through the details but just looking at those instances we felt that in each case we wereable to clearly identify causes, contributing factors and corrective actions. And thus with respect to those three we felt that the actions we've taken were very responsive to what happened and we were not concerned.

With respect to the most recent incident on Unit Two, we were troubled by the fact that we really could not identify a fundamental cause. It would appear to us that the, it was, simply a case of an operator inattention, and frankly we don't like to accept that as an answer.

Consequently we went in to considerable other actions to try and find out if there are any other factors at work. I'll mentions just a few of these, the once a shift we brought on a member of management other then supervision normally present to asses control room activities,

Well, in looking at these past events, we feel very good about the action we've taken, we are troubled a little bit by this last one, it's it's, operator's clearly an important line of defense but the only line of defense, and to just say that the operator missed it is a conclusion we don't like to make, even though that's also the conclusion that the Regions Inspection Report made.

So we are doing all of these other things, to satisfy ourselves that we haven't missed anything, and that the operators are doing well. I would also point out that these vew instances are in sharp contrast to the many occasions where the operators have reacted very well. Anticipated events, prevented challanges to safety systems based on something going on, and thus I feel quite good in terms of their overall performance but, certainly we want to look at this area closely.

COMMISSIONER ASSELSTINE: Thank you very much.

COMMISSIONER BERNTHAL: Thank you that was an excellent presentation. I'd just like to comment I think in many ways the most impressive part of your presentation was your answer to Commissioner Asselstines questions, and I'd like to complement you on that.

COMMISSIONER ASSELSTINE: It certainly bears out some of the comments that the Region made earlier in terms of your responsiveness and attention to dealing with any

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problems that you find.

CHAIRMAN PALLADING: Now we don't have financial qualification yet. Hersel is this something that we talk publically or?

MR. PLAINE: I regret to say that this is a matter that should be discussed in a close session because, it does have a direct bearing on what one would call, litigation status. There fore we need the benefits of using excemption ten, of the Sunshine Act. On short notice.

CHAIRMAN PALLADINO: Well I think that the

Commission is willing to close the meeting for a while. I

think though any decision we make, has to be made at an open
meeting. Is the Commission willing to close the meeting?

MR. PLAINE: It shouldn't take us too long I

hope.

CHAIRMAN PALLADINO: Open the meeting for the.

MR. PLAINE: That may be the better way to do it,

18 I guess.

CHAIRMAN PALLADINO : It also gives me an excuse for a break.

MR. PLAINE: Which you need anyway.

CHAIRMAN PALLADINO: And if it turns out that what we discuss in the closed meeting isn't appropriate then.

MR. PLAINE: Of course.

CHAIRMAN PALLADINO: What would be the excemption?

MR. PLAINE: Exception 10 the sunshine act.

COMMISSIONER BERNTHAL: That's I defer to General Counsel on these matters. as I always do.

CHAIRMAN PALLADINO: So why don't we close the meeting and while we're clearing the room, you can have a short break.

MR. KENYON: Excuse me could the applicant interest
I don't know if this is appropriate, but just say one or
two words before you go into closed session?

CHAIRMAN PALLADINO: On what?

MR. KENYON: On the financial qualification. We just have a vital interest and we'd just like to share just two thought with you.

CHAIRMAN PALLADINO: We're going to open the meeting again. Maybe that might be a better time. I think any decision we make will be made in open, and you can speak at that time.

MR. KENYON Thank you.

(Whereupon, the foregoing meeting was adjourned to reconvene after a short closed meeting.)

TROCKLINE HAS

COMMISSIONER PALLADING: And now we're going to have a public meeting in which we take up the question of voting on the Susquehanna 2 power ascension. So we shall convene that meeting. I'll need a vote to hold it on short notice.

COMMISSIONERS: Aye.

COMMISSIONER PALLADINO. Alright, now are there further questions or comments that individual Commissioners have with regard to the question of approving power sanction for Susquehanna 2?

brief comment and it relates to the financial qualification issue just to explain my vote. I'm going to abstain on the vote on the license. I regret that, I think it's unfortunate. I think with the exception of the financial qualifications issue everything I've heard today indicates that this plant is ready to go above 5% power and I have no reservations about it on any other respect other than financial qualifications. If the Commission had acted on the financial qualifications issue early on, when the issue was first presented to us about a month or so ago, I think we could have had a Licensing Board decision on the outstanding financial qualifications issue at this point and that would have enabled me to vote for the license, but because

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that issue has not been resolved I'm going to abstain from the vote. I feel quite confident that when this gets to the courts ultimately that issue is going to have to be reopened and addressed.

that, aside from the financial qualifications issue, which is a considerably larger issue I should say than has anything to do with this particular utility, an issue which they happened to get caught up in, I've been very impressed with the presentation that we've heard here today both from our staff and the utility. In fact, I'm moved to wonder in view of my reading of the newspapers at least some utilities have begun to diversify whether they maybe shouldn't go into management consulting. I think we've some very good things about the management, in particular, and so I'm prepared to vote in favor of the full power operating license.

COMMISSIONER PALLADINO: Well then let me call for a vote. All those in favor of authorizing to permit the Susquehanna unit #2 to proceed above 5% power when the staff feels it is ready, say aye.

COMMISSIONERS: Aye, Aye.

COMMISSIONER PALLADINO: Opposed?

COMMISSIONER ASSELSTINE: I abstain.

COMMISSIONER FALLADINO: And I gather Commissioner Gilinsky is not participating in anything further to come

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before us. Thank you for participating. Adjourned.

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#### CERTIFICATE OF PROCEEDINGS

This is to certify that the attached proceedings before the NRC COMMISSION

Commission Meeting
Briefing - Discussi

Briefing - Discussion/Possible Vote on Full Power Operating License for Susquehanna-2

Date of Proceeding: Thursday, May 24, 1984

Place of Proceeding: Washington, D.C.

In the matter of:

were held at herein appears, and that this is the

original transcript for the file of the Commission.

KIM SCHROEDER
Official Reporter

Official Reporter

# COMMISSION BRIEFING

# SUSQUEHANNA STEAM ELECTRIC STATION, UNIT 2

FULL POWER AMENDMENT

MAY 24, 1984

# BRIEFING OUTLINE

- LICENSEE/PLANT BACKGROUND AND UNIT 2 STATUS AND SCHEDULE
- SELECTED REVIEW TOPICS
  - SHIFT STAFFING/EXPERIENCE LEVELS
  - TECHNICAL SPECIFICATIONS
- OPERATING EXPERIENCE
  - READINESS FOR FULL POWER OPERATION
  - UNIT 2 OPERATING HISTORY
  - ALLEGATIONS
  - ESCALATED ENFORCEMENT HISTORY
- CONCLUSIONS

# LICENSEE/PLANT BACKGROUND

- PENNSYLVANIA POWER & LIGHT COMPANY
- · BECHTEL A/E
- SUSQUEHANNA UNIT 2 (BWR 4; MARK II CONTAINMENT)
- SATISFACTORY STATION EMERGENCY PREPAREDNESS DRILL
   CONDUCTED APRIL 4, 1984
- SUSQUEHANNA UNIT 1 OL ISSUED JULY 1982

# UNIT 2 STATUS AND SCHEDULE

LOW POWER LICENSE ISSUED
 MARCH 23, 1984

INITIATED FUEL LOADING
 MARCH 28, 1984

• FUEL LOADING COMPLETE APRIL 13, 1984

• INITIAL CRITICALITY MAY 8, 1984

• READY TO EXCEED 5% POWER MAY 28, 1984 (E)

SELECTED REVIEW ITEMS

# SHIFT STAFFING/EXPERIENCE LEVELS

- 5 SHIFT OPERATION
- STAFFING NEEDS UNITS 1/2 TOTALS ON SHIFT
  - 2 SROs
  - 3 ROS
  - 1 STA
- ALL SROS AND ROS LICENSED TO OPERATE EITHER UNIT
- PP&L HAS 47 LICENSED PERSONNEL ON SHIFT FOR DUAL OPERATION:
  - SHIFT SUPERVISORS (SRO) 8

    CONTROL ROOM SUPERVISORS (SRO) 5

    AUXILIARY UNIT SUPERVISORS (SRO) 7

    AUXILIARY UNIT SUPERVISORS (RO) 2

    PLANT CONTROL OPERATORS (RO) 25

# SHIFT STAFFING/EXPERIENCE LEVEL

	NO.	AVERAGE (MONTHS)	NUCLEAR EXPER RANGE (MONTHS)	IENCE NO. WITH 6 MONTHS HOT				
SHIFT SUPERVISORS	8	129.8	101.4-173.5	8				
CONTROL ROOM SUPV.  AUXILIARY UNIT SUPV.	14	102.3	42.5-147.5	9				
PLANT CONTROL OPERATORS	25	70.8	23.5-107.5	18				

• STAFFING EXPERIENCE EXCEEDS INDUSTRY RECOMMENDATIONS

# TECHNICAL SPECIFICATIONS

- PP&L PROVIDED CERTIFICATION THAT TECHNICAL SPECIFICATIONS
   ARE CONSISTENT WITH FSAR AND AS-BUILT PLANT
- SIMILAR TECHNICAL SPECIFICATIONS AS UNIT 1. UNIT 2
   TECHNICAL SPECIFICATIONS WERE PREPARED BASED ON UNIT 1
   TECHNICAL SPECIFICATIONS (WITH CHANGES)
- TRAINING WAS CONDUCTED ON SPECIFIC DIFFERENCES BETWEEN UNIT 1 AND UNIT 2
- AUDIT PERFORMED BY EG&G IDAHO REGARDING UNIT 2 TECHNICAL SPECIFICATIONS AS COMPARED TO FSAR AND SER
- AUDIT PERFORMED BY FRC REGARDING UNIT 2 TECHNICAL
   SPECIFICATIONS AS COMPARED TO AS-BUILT PLANT
- NO SIGNIFICANT DISCREPANCIES

# OPERATING EXPERIENCE (REGION I SLIDES)

# READINESS FOR FULL POWER OPERATION UNIT TWO

- CONSTRUCTION AND PREOPERATIONAL TESTING INSPECTION IS COMPLETE AND CONFIRMS THAT NRC REQUIREMENTS AND LICENSEE COMMITMENTS ARE MET.
- 2. THE NRC INSPECTION PROGRAM IS CURRENT.
- 3. THE SALP REPORT ISSUED MAY 4, 1984 RATED ALL UNIT TWO AREAS AS CATEGORY 1.
- 4. EMERGENCY PREPAREDNESS USES THE SAME EMERGENCY PLAN FOR BOTH UNITS. NRC OBSERVATION OF THE APRIL 4, 1984 EMERGENCY PRE-PAREDNESS EXERCISE FOUND NO SIGNIFICANT DISCREPANCIES.
- 5. NO OPEN INSPECTION ITEMS PRECLUDE LICENSE ISSUANCE.

# UNIT 2 OPERATING HISTORY

5/8/84 INITIAL CRITICALITY ACHIEVED.

5/16/84 HEAT UP IN PROGRESS - HOLDING AT LESS

THAN 150 PSIG

# ALLEGATIONS

- -- BISCO PENETRATION SEAL ADEQUACY. INSPECTION HAS FOUND NO INADEQUACIES.
- -- CHUGGING METHODOLOGY ANALYSIS CODE ADEQUACY. EVALUATION BY NRR FINDS CHUGGING METHODOLOGY ADEQUATE. CONFIRMATION OF DATA IN PROGRESS.

# SUSQUEHANNA ESCALATED ENFORCEMENT HISTORY

# UNIT 2

APRIL 1984 -- LOADING FUEL WITH SOURCE RANGE MONITOR CHANNEL
"A" SCRAM FUNCTION BYPASSED. (ENFORCEMENT ACTION
PENDING)

# UNIT 1

- FEBRUARY 1984 -- DURING STARTUP, 150 PSIG PLANT PRESSURE WAS

  EXCEEDED FOR TWO HOURS WITH HIGH PRESSURE COOLANT

  INJECTION SYSTEM INOPERABLE. (ENFORCEMENT ACTION
  PENDING)
- FEBRUARY 1984 -- PLANT STARTUP BEGAN WITHOUT COMPLETION OF LINEUP

  OF HIGH PRESSURE COOLANT INJECTION SYSTEM AND OF

  REACTOR CORE ISOLATION COOLING SYSTEM (ENFORCEMENT

  ACTION PENDING)
- NOVEMBER 1983 -- MAIN CONDENSER OFFGAS TREATMENT SYSTEM EXPLOSIVE

  GAS MONITORING SYSTEM INOPERABLE FOR ABOUT THREE

  DAYS WITHOUT REQUIRED GRAB SAMPLES BEING TAKEN.

  (ENFORCEMENT ACTION PENDING)
- OCTOBER 1983 -- A SEVEN-HOUR LOSS OF INDEPENDENCE OF ONE OF THE
  TWO OFFSITE POWER SUPPLIES FOR ONE OF THE FOUR
  DIESEL BUSSES. (EMFORCEMENT ACTION PENDING)
- FEBRUARY 1983 -- STANDBY HAS TREATMENT SYSTEM INOPERABLE FOR ABOUT 24 HOURS (\$60,000.00 CIVIL PENALTY)

# UNIT 1 OPERATING HISTORY

09/10/82 - INITIAL CRITICALITY

11/12/82 - FULL POWER AUTHORIZED

02/04/83 - ACHIEVED 100% POWER

04/04/83 - COMPLETED STARTUP PROGRAM

1983 AVAILABILITY 75.8%

# CONCLUSIONS

THE STAFF CONCLUDES THAT THE LICENSEE HAS SATISFIED ALL REQUIREMENTS FOR ISSUANCE OF A FULL POWER LICENSE.

DRAFT

NUREG-0776 Supplement No. 7

# Safety Evaluation Report related to the operation of Susquehanna Steam Electric Station, Units 1 and 2

Docket Nos. 50-387 and 50-388

Pennsylvania Power & Light Company Allegheny Electric Cooperative, Inc.

# U.S. Nuclear Regulatory Commission

Office of Nuclear Reactor Regulation

May 1984



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A CONTINUATION OF CHRONOLOGY OF NRC STAFF RADIOLOGICAL REVIEW OF SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2

#### ABSTRACT

In April 1981, the staff of the Nuclear Regulatory Commission issued its Safety Evaluation Report (NUREG-0776) regarding the application of the Pennsylvania Power & Light Company (the applicant and/or licensee) and the Allegheny Electric Cooperative, Inc. (co-applicant) for licenses to operate the Susquehanna Steam Electric Station, Units 1 and 2, located on a site in Luzerne County, Pennsylvania.

Supplement 1 to NUREG-0776 was issued in June 1981 and addressed several outstanding issues. Supplement 2 was issued in September 1981 and addressed additional outstanding issues. Supplement 2 also contains NRC staff responses to the comments made by the Advisory Committee on Reactor Safeguards in its report dated August 11, 1981. Supplement 3 was issued in July 1982 and addressed five items that remained open and closed them out. On July 17, 1982, Operating License NPF-14 was issued to allow Unit 1 operation at power levels not to exceed 5% of rated power. Supplement 4 was issued in November 1982 and discusses the resolution of several license conditions. On November 12, 1982, Operating License NPF-14 was amended to remove the 5% power restriction, thereby permitting full-power operation of Unit 1. Supplement 5 was issued in March 1983 and addressed several issues that required resolution before licensing operating of Unit 2. Supplement 6 was issued in March 1984 and addressed the remaining issues that required resolution before licensing operation of Unit 2 and closed them out. On March 23, 1984, Operating License NPF-22 was issued to allow Unit 2 operation at power levels not to exceed 5% of rated power.

This supplement to NUREG-0776 addresses those issues which required resolution prior to allowing Unit 2 operation at power levels exceeding 5% rated power.

#### 1 INTRODUCTION (1) GENERAL DISCUSSION

#### 1.1 Introduction

In April 1981, the staff of the Nuclear Regulatory Commission (NRC) (the staff) issued its Safety Evaluation Report (SER) (NUREG-0776) regarding the application of the Pennsylvania Power & Light Company (PP&L) (the applicant and/or licensee) and the Allegheny Electric Cooperative, Inc. (the co-applicant) for licenses to operate Susquehanna Steam Electric Station, Units 1 and 2. In June 1981, the staff issued Supplement 1 to NUREG-0776, which documented the resolution of several outstanding issues in further support of the licensing activities. In September 1981, the staff issued Supplement 2 to NUREG-0776, which addressed the open items identified in the SER and Supplement 1. In July 1982, the staff issued Supplement 3 to NUREG-0776, which addressed all remaining open issues from previous supplements and closed them out. On July 17, 1982, Operating License NPF-14 was issued for Unit 1. Operation was restricted to fuel loading and low-power testing at levels not to exceed 5% rated power. In November 1982, the staff issued Supplement 4 to NUREG-0776, which addressed the resolution of several Unit 1 license conditions that had been met. On November 12, 1982. Amendment 5 to Operating License NPF-14 was issued removing the 5% power restriction, thus allowing Unit 1 operation at power levels not to exceed 100% rated power. In March 1983, the staff issued Supplement 5 to NUREG-0776, which addressed several issues that required resolution before Unit 2 could be licensed for operation. In March 1984, the staff issued Supplement 6 to NUREG-0776, which addressed the remaining issues the required resolution before licensing operation of Unit 2. On March 23, 1984. Operating License NPF-22 was issued for Unit 2. Operation was restricted to fuel loading and low-power testing at levels not to exceed 5% rated power.

Each section containing issues addressed in this report, Supplement 7 to NUREG-0776, is numbered and titled to correspond to the sections of NUREG-0776 and its earlier supplements where they are previously discussed. This report addresses the remaining issues that require resolution before Unit 2 can be licensed for full power operation and closes them out.

Copies of this report are available for public inspection at the Commission's Public Document Room, 1717 H Street, N.W., Washington, D.C., and at the Osterhout Free Library, 71 South Franklin Street, Wilkes Barre, PA 18701. Copies of this report also are available for purchase from the sources indicated on the inside front cover.

The NRC project manager for Susquehanna is Mr. Robert L. Perch. Mr. Perch may be contacted by writing to the Division of Licensing, U. S. Nuclear Regulatory Commission, Washington, D. C. 20555.

The following additional NRC staff member contributed to this report, which is a product of the staff.

Name Jerry Mauck Position Reactor Engineer Branch
Instrumentation and Control Systems

#### 1.10 License Conditions

There was one issue for which a condition was included in Operating License NPF-22 which required satisfactory resolution prior to exceeding 5% rated power. The current status and section in which the staff evaluates this issue is shown below:

Issue Additional instrumentation and control concerns

Status Resolved Section 7.7.2

#### 7 INSTRUMENTATION AND CONTROL

### 7.7 Control Systems Not Required for Safety

### 7.7.1 General Discussion

# Common Electrical Power Sources or Sensor Malfunctions Causing Multiple Control System Failures

During the Instrumentation and Control Systems Branch (ICSB) review of the Susquehanna Steam Electric Station (SSES) Final Safety Analysis Report (FSAR), the staff noted that the analysis reported in Chapter 15 is intended to demonstrate the adequacy of the safety systems in mitigating anticipated operational occurrences and accidents, including those related to control systems. Based on the conservative assumptions made in defining these design basis events and the review performed, it was likely that the Chapter 15 analyses adequately bounded events initiated by a single control system failure. However, to assure that the Chapter 15 analyses adequately bound events caused by multiple control system malfunctions due to failures of shared power supplies, sensors or sensor lines, the staff requested that the licensee perform a review to determine what, if any, design changes or operator actions would be necessary to assure that these malfunctions would not complicate the event beyond the FSAR analysis.

# High Energy Line Breaks and Consequential Control System Failures

If control system are exposed to the environment resulting from the rupture of reactor coolant lines, steam lines or feedwater lines, the control systems may malfunction in a manner which could cause consequences to be more severe than assumed in the FSAR safety analyses.

The staff requested Pennsylvania Power & Light Company (PP&L) to perform a review to determine what, if any, design changes or operator actions would be necessary to assure that these multiple control system malfunctions would not complicate the event beyond the FSAR analysis. In response to this concern, PP&L initiated a review to determine whether High Energy Line Breaks (HELBs) could have an effect on multiple controls systems and to investigate the impact of failure of the applicable systems on the FSAR Chapter 15 analysis.

# 7.7.2 Specific Findings

# Common Electrical Power Sources or Sensor Malfunctions Causing Multiple Control System Failures

By letters dated October 14, 1983 and February 27, 1984 from N. W. Curtis (PP&L) to A. Schwencer (NRC), the licensee provided reports that presented the results of a design review, evaluation and plant walkdown addressing this concern for Unit 1 and Unit 2 respectively.

The methodology that the licensee utilized for this design review was divided into a two phase approach as discussed below. Phase 1, the "identification phase", consisted of identifying the following key items:

(1) Plant safety functions

(2) Control systems

(3) Power supplies and sensors to the control systems

(4) Power supplies and sensors common to control systems.

For these key items, Control System Identification Diagrams (CSID) were generated to document the information and to assist in further analysis. Power supply and sensor commonality was determined using the CSIDs. A second diagram, the Commonality Diagram (CD), was generated to show the control systems that were affected by each common power supply or sensor failure.

Phase 2, the "analysis phase", consisted of the analyses of the failure of these common power supplies and sensors with respect to their associated control systems. The control system failures were analyzed with respect to the following criteria:

(1) Plant response as per Chapter 15

(2) Plant conditions within operator and safety system capabilities

(3) Reanalysis or modifications required to correct any problems not covered by the first two criteria.

The methodology employed in the analysis phase was based upon Failure Modes and Effects Analysis (FMEA). This technique was performed on each common power supply and sensor to determine the effect of the failure on the control system and on plant performance.

A total of ten power supply and sensor commonalities for Unit 1 and eleven for Unit 2 were identified and analyzed. Of these commonalities, all were of the power supply type, except one which was of the sensor type. The review identified one commonality which required a detailed analysis concerning the loss of a 125V DC bus (10635 for Unit 1 and 20635 for Unit 2).

The control systems affected by this power supply failure in Unit 1 are the Reactor Feedwater, and the Pressure Regulator and Turbine/Generator (T/G) Control Systems. In addition to these, the recirculation runback circuitry is affected in Unit 2. The conditions that required a detailed analysis however, were specifically limited to the Feedwater Flow Control and Reactor Feedwater Pump Turbine (RFPT) control subsystems worst case failures. The loss of these power supplies did not generate conditions outside the boundary of the Chapter 15 safety analyses for the Pressure Regulator and T/G Control Systems or the Recirculation Runback Control System (Unit 2 only). The sequence of events for Unit 1 (Unit 2 is similar) that result from the loss of power supply 1D635 for the Feedwater System is as follows:

- a. While operating at 100% reactor power, the plant experiences a loss of 1D635. The feedwater flow signal from the B train instrumentation powered by 1D635 (Flow Transmitter FT1N002B and SRU 6) changes to zero due to the loss of 1D635. Since the feedwater flow signals from trains A, B and C are summed, the total feed flow signal changes from 100% feed flow to 67% feed flow subsequent to receiving the erroneous zero signal from the B train. This introduces a mismatch between steam flow, which is still at 100%, and feed flow which is at 67%.
- b. In response to this steam flow, feed flow mismatch, the Feedwater Flow Control System sends a signal to the three RFPT's to increase feed flow to make up for the erroneous 33% decrease in flow. Actual feed flow at this point would be approximately 135%.
- c. Since actual feed flow is significantly greater than that required, the increase in reactor vessel level may reach the Level 8 (high level) trip set point.
- d. If the Level 8 trip set point is reached, a trip signal will be sent to RFPTs A, B, and C and the T/G. RFPTs A and B and the T/G trip. RFPT C fails to trip because its trip circuit was disabled upon loss of 1D635.

Based on the assumption that the Level 8 setpoint is reached due to excessive feedwater demand, it was found that the resulting conditions were not explicitly addressed by the Chapter 15 safety analyses. Chapter 15 status that the plant response to a Level 8 condition, initiated by excess feedwater flow, should include the trip of all RFPTs and the T/G. Since the conditions generated subsequent to the failure of RFPT C to trip are not known, it could not be determined if the plant system capabilities were within the bounds governed by the existing safety analyses.

However, it was evident that the operator retained the ability to take manual control of RFPT C to mitigate the effects of its continued operation. The operator would have been alerted to the using reactor vessel level by the Level 7 alarm. This condition, therefore, appeared to be within the capabilities of the operator. To provide a further analysis of this event, the licensee utilized a RETRAN computer code to simulate the event.

It should be noted that the NRC staff and their technical assistance consultants at Argonne National Laboratory have concluded that the use of the RETRAN computer code to perform licensing basis calculations is acceptable (with the understanding that the generic review of RETRAN is not complete, and the acceptability of all reviews is predicated on the anticipated successful completion of this generic review), that the selection of options and input to RETRAN provide a reasonable and adequate representation of the thermohydraulics, and that the results of these calculations can determine an acceptable set of input and initial conditions for the critical power ratio calculations.

The first RETRAN run was performed simulating the loss of one feedwater flow element. This run indicated that the reactor water level would rise to 53.3 inches in 50 seconds and then become stable. While this level is below the 54 inch Level 8 setpoint, it is close enough that normal instrument drift could cause trips. Therefore, a second RETRAN run was performed so that the effects of the Level 8 trip could be examined. The computer code was modified to force a trip at 53.3 inches and to force a minimum feedwater injection rate of 25%.

The licensee stated that this simulation was over conservative in that the transient run had a steadily increasing water level due to the 25% assumed feedwater injection rate, when in actuality, upon a RFPT B trip, the false feedwater flow vs. steam flow mismatch is corrected and the feedwater controller will attempt to control reactor water level to the controller setpoint. Even with a feedwater pump running, the controller has the ability to terminate feedwater injection. Actual feedwater injection will terminate at approximately 70 to 90 seconds after the turbine trip due to a feedwater controller setback which was not modelled by the RETRAN code.

The results of the RETRAN simulated transient run indicate that the event is, in fact, bounded by the Chapter 15 safety analysis for thermal limit considerations. Therefore, the staff has concluded that the safety limits of Chapter 15 are not violated, and in addition, the resulting conditions are within the capabilities of the plant operators and safety systems. All of the remaining control system commonalities were determined to be either bounded by the results of the Chapter 15 safety analyses or did not impact plant safety.

The staff requested the licensee to identify all significant non-safety related multiple control system events caused by failures of shared sensor impulse lines. The licensee stated in a letter dated April 12, 1984 from N. W. Curtis to A. Schwencer, that based on the analysis performed, no significant non-safety related multiple control system events were caused by failures of shared sensor impulse lines. The staff then requested the licensee to verify that for each failed shared power supply, sensor and sensor impulse line, or the subsequent multiple control system failures, redundant safety-related systems are available (i.e., unaffected by the event) to mitigate the effects of the event. The intent was to assure that the consequences of the event can be mitigated given a single failure within the system used to mitigate the event. The licensee stated in the April 12 letter that for each multiple control systems failure event analyzed. redundant safety systems are available to mitigate the event and are unaffected by the multiple control system failure event. Furthermore, the licensee stated in the April 12 letter that with the exception of the feedwater level 8 trip. no credit was taken in the analysis for non-safety related equipment to mitigate the effects of these failures. Since the level 8 trip is used to terminate the feedwater controller failure in FSAR Chapter 15, the licensee stated that the level 8 trip can be used to mitigate the effects of various multiple control system failure events when they are analyzed against the feedwater controller failure event in Chapter 15. The level 8 trip has been incorporated into the Susquehanna Technical Specifications and its use to mitigate the effects of the feedwater controller failure event was found to be acceptable by the staff during the Operaing License (OL) review (FSAR Ouestion 211.139).

In conclusion, the licensee stated the plant conditions that result from these multiple control system failures do not exacerbate the conditions that result from the events analyzed in Chapter 15 from a 10CFR100 guidelines perspective. In each case, the worst case event combinations are bounded by the radiological consequences currently provided for each Chapter 15 event.

#### High Energy Line Breaks and Consequential Control System Failures

By letters dated October 14, 1983 and April 2, 1984 from N. W. Curtis (PP&L) to A. Schwencer (NRC), PP&L provided reports that presented the results of a design review, evaluation and plant walkdown addressing this concern for Unit 1 and Unit 2 respectively.

The methodology that was utilized by the licensee for this review was designed to meet the following objectives:

- (1) to identify potential HELB which could impact two or more control systems either by pipewhip, jet impingement, or the resultant harsh environment.
- (2) to analyze the effects of the HELBs on the components/cables which comprise the control systems and to determine the impact of the specific component failures on the control systems.
- (3) For simultaneous malfunctions of control systems due to a single HELB, determine if the combined failures are bounded by the Chapter 15 analyses and are within the capabilities of operators and safety systems.

A two phase approach was used as part of this methodology. Phase 1, the "identification phase", consisted of identifying the following terms:

(1) Plant safety function

(2) Control system components and cables

(3) Control system components and cable locations(4) HELBs common to control system components/cables

Phase 2, the "analysis phase", consisted of the analysis of the multiple control system failures as a result of a single HELB. The control system failures were analyzed with respect to the following criteria:

(1) Plant response as per Chapter 15

(2) Plant conditions within operator and safety system capabilities

(3) Reanalysis or modifications required to correct any problems not covered by the first two criteria.

The methodology employed in the analysis phase was based upon Failure Modes and Effects Analysis (FMEA). The FMEA technique was used to generate failure effects information on each control system as it pertains to the specific HELB.

The licensee performed the HELB study using the guidelines noted above. The results of the study indicated that all postulated events satisfy the criteria for infrequent events, i.e., that the dose consequences do not exceed 10% of the 10 CFR 100 criteria.

A total ( 4 HELB/multiple control system commonalities were identified. Of these, one . located inside primary containment, one in the reactor building outside primary containment, and 22 in the turbine building.

Because high energy lines (main steam, feedwater, and condensate) are located in almost every area of the turbine building, over 20 multiple control system/ HELB interactions were identified. The most severe interaction was in a plant area adjacent to the control structure. This area contains a majority of the cable, routed from the sensors in the turbine to the control structure for the turbine/generator control, feedwater control, recirculation flow control, and reactor manual control systems. All of this cable would be affected by a jet from a 20 inch feedwater line longitudinal break. This pipe is the inlet to the feedwater heater. The initial pressure is assumed to be 400 psia based on the feedwater pump suction pressure requirements and the condensate pump discharge pressure. The turbine building is a large structure which is relatively open. This provides free communication of air and, following a major steam or feedwater line break, would result in a harsh environment (100°F) for a majority of the turbine building areas. Because of this, the licensee used the "sacrificial" approach, where all components and cables are assumed to fail in their worst mode due to harsh environment following a main steam or feedwater line break.

A postulated break of a main steam or feedwater line represents the largest steam or liquid lines outside of containment and provides the envelope evaluation relative to this type of occurrence in the turbine building. The break spectrum analysis for the complete range of reactor conditions indicates that the limiting fault event for breaks outside the containment is a complete severance of one of the four main steam lines. The feedwater system break is less severe than the main steam line break in terms of reactor response. The consequences of the main steam line break which envelops all of the HELB/multiple control system interactions listed by the licensee are as follows:

- (1) Largest steam line circumferentially breaks at a location downstream of the outermost isolation valve in the turbine building.
- (2) Flow from the upstream portion is limited by the flow restrictor upstream of the inboard isolation valve.
- (3) Flow from the downstream side is limited by the total area of the three unbroken lines.
- (4) MSIVs start to close at 0.5 seconds on a high steam flow signal and are fully closed at 5.5 seconds.

- (5) Reactor vessel level rises due to rapid depressurization and increased void formation.
- (6) Recirc pumps trip on high reactor vessel pressure signal.
- (7) Reactor scrams on high reactor vessel level or MSIV closure.
- (8) Reactor feed pumps trip due to termination of steam flow to pump turbines following MSIV closure.
- (9) Safety relief valves cycle to maintain vessel pressure at approximately 1100 psi.
- (10) Turbine trips on MSIV closure or high reactor vessel level.
- (11) Reactor water level above core begins to drop slowly due to loss of steam through the safety valves. Reactor pressure still at approximately 1100 psi.
- (12) RCIC and HPCI would initiate on low water level (RCIC considered unavailable, HPCI assumed single failure and therefore not available).
- (13) Operator initiates ADS. Vessel depressurizes rapidly.
- (14) Low pressure ECCS systems initiated. Reactor ruel uncovered partially.
- (15) Core effectively reflooded and clad temperature heatup terminated. No fuel failure.

Following this event, none of the components located in the turbine building for the T/G control system, recirc control system, and feedwater flow control system are required to operate and there is no adverse affect on plant safety.

The staff requested the licensee to verify that for each HELB event and its consequential control system failures, redundant safety related systems are available (i.e., unaffected by the event) to mitigate the effects of the event. The intent was to assure that the consequences of the event can be mitigated given a single failure within the system used to mitigate the event. The licensee stated in a letter dated April 12, 1984 from N. W. Curtis to A. Schwencer that the conditions that resulted from the failure of multiple control systems due to HELBs were analyzed against each event in Chapter 15 to determine if these resultant conditions in combination with the conditions described in each specific Chapter 15 event were within the response capabilities of the plant sifety systems.

In each case, the redundant safety systems that were available to mitigate the Chapter 15 event were unaffected by the additional failures of the control systems due to HELBs. Furthermore, the licensee stated in the April 12, 1984 letter that with the exception of the feedwater level 8 trip, no credit was taken in the analysis for non-safety related equipment to mitigate the effects

of these failures. Since the level 8 trip is used to terminate the feedwater controller failure in FSAR Chapter 15, the level 8 trip can be used to mitigate the effects of various HELBs when they are analyzed against the feedwater controller failure event in Chapter 15. The level 8 trip has been incorporated in the Susquehanna technical specifications and its use to mitigate the effects of the feedwater controller failure event was found to be acceptable by the staff during the operating license review (FSAR Question 211.139).

In conclusion the licensee stated that the plant conditions that result from the HELBs do not exacerbate the conditions that result from the events analyzed in Chapter 15 from a 10 CFR 100 guidelines perspective. In each case, the worst case event combinations are bounded by the radiological consequences currently provided for each Chapter 15 event.

#### 7.7.3 Summary

## Common Electrical Power Sources or Sensor Malfunctions Causing Multiple Control System Failures

Based on our review which indicates that the radiological consequences of the worst case multiple control system failure event is bounded by the radiological consequences currently provided for each Chapter 15 event, the staff finds that the conclusions of the analyses of the anticipated operational occurence and accidents as presented in Chapter 15 have been used to confirm that plant safety is not dependent on the response of the control systems. The staff concludes that multiple failures of control systems as a consequence of a failure of shared power supplies, sensors or sensor impulse lines will not result in plant conditions more severe than those bounded by the Chapter 15 safety analysis.

Therefore, License Conditions 2.C.(25)(a) for Unit 1 and 2.C.(10)(a) for Unit 2 of the Susquehanna facility (operating License NPF-14 for Unit 1 and NPF-22 for Unit 2) have been acceptably resolved.

However, it should be noted that the final resolution of this concern is predicated on the anticipated successful completion of the generic review of the RETRAN computer code utilized in the licensee's study. This generic review is being conducted by the staff and their technical consultants at Argonne National Laboratory. Although this review is not complete, enough progress has been made to date so that along with the information submitted by the licensee, adequate basis has been established to perform the review for this analysis.

### High Energy Line Breaks and Consequential Control System Failures

Based on our review of the licensee's study which indicates that the radiological consequences of the worst case event combinations are bounded by the radiological consequences currently provided for each Chapter 15 event, the staff finds that the HELB concern is resolved. Therefore, License Conditions 2.C.(25)(b) for Unit 1 and 2.C.(10)(b) for Unit 2 of the Susquehanna facility (Operating License NPF-14 for Unit 1 and NPF-22 for Unit 2) have been acceptably resolved.

#### APPENDIX A

CONTINUATION OF CHRONOLOGY OF NRC STAFF RADIOLOGICAL REVIEW OF SUSQUEHANNA STEAM ELECTRIC STATION, UNIT 1 AND 2

Appendix A in the Safety Evaluation Report and Supplements 1, 2, 3, 4, 5, and 6 provided a chronology of the NRC staff's radiological safety review of the application for the period April 10, 1978 to March 15, 1984; the purpose of this appendix is to update that chronology.

February 29, 1984	Letter from applicant concerning schedule for completion of Regulatory Guide 1.97 requirements.
March 1, 1984	Letter from applicant concerning revised response to Generic Letter 83-28.
March 1, 1984	Letter from applicant transmitting proposed Amendment 37 to License NPF-14.
March 2, 1984	Letter to applicant approving Change P to the Physical Security Plan.
March 5, 1984	Letter to applicant concerning Susquehanna Unit 2 Technical Specifications.
March 7, 1984	Letter from applicant concerning Preoperational Primary Reactor Containment Integrated Leak Rate Test.
March 8, 1984	Representatives from NRC and Pennsylvania Power & Light Company meet at the Susquehanna Steam Electric Station Site in Luzerne County, Pennsylvania for an NRC Management Site Visit and Readiness of Susquehanna Unit 2 for Licensing. (Summary issued March 30, 1984)
March 8, 1984	Letter from applicant transmitting a supplemental report on the detailed control room design review.
March 9, 1984	Letter from applicant concerning operating experience.
March 9, 1984	Letter from applicant transmitting Amendment 56 to the operating license application containing Revision 34 to the Final Safety Analysis Report.
March 12, 1984	Representatives from NRC and Pennsylvania Power & Light Company meet in Bethesda, Maryland, to discuss staff evaluation of Susquehanna Detailed Control Room Design Review Report. (Summary issued March 30, 1984)

March 12, 1984	Letter from applicant transmitting a special report on fire protection.
March 13, 1984	Letter from applicant concerning clarification of Emergency Operations Facility Operation.
March 13, 1984	Letter from applicant transmitting the Monthly Operation Report for February 1984.
March 13, 1984	Letter from applicant concerning conformance to Regulatory Guide 1.97.
March 14, 1984	Letter from applicant concerning Generic Letter No. 82-33.
March 15, 1984	Letter from applicant concerning Human Engineering Discrepancies - Unit 2 Control Room.
March 15, 1984	Letter from applicant responding to request for additional information - Unit 2 SQRT Program.
March 15, 1984	Letter from applicant concerning feedwater check valve analysis.
March 16, 1984	Letter from applicant concerning notification of Unit 2 construction completion.
March 16, 1984	Letter from applicant concerning Final Safety Analysis Report Revision to Chapters 6, 7 and 18.
March 20, 1984	Letter from applicant concerning certification of Unit 2 Technical Specifications.
March 22, 1984	Letter from applicant transmitting the annual financial report.
March 23, 1984	Letter to applicant transmitting 2 copies of Supplement No. 6 to the Safety Evaluation Report Related to Operation of Susquehanna Steam Electric Station, Units 1 and 2 (NUREG-0776).
March 23, 1984	Letter to applicant transmitting Facility Operating License NPF-22 for Susquehanna Steam Electric Station, Unit 2. The license is restricted to 5% of full power pending Commission approval for 100% power.
March 28, 1984	Letter from applicant transmitting the Annual Personnel Monitoring Report.
March 29, 1981	Letter from applicant transmitting an amended response to Final Safety Analysis Report Question 110.57.

April 2, 1984	Letter from applicant concerning evaluation of high energy line breaks on control systems study for Unit 2.
April 5, 1984	Letter to applicant transmitting 20 copies of Supplement No. 6 to the Susquehanna Steam Electric Station Safety Evaluation Report - NUREG-0776.
April 6, 1984	Letter from applicant concerning major modification to initial test program for Unit 2.
April 10, 1984	Letter from applicant transmitting the Monthly Operating Report for March 1984.
April 10, 1984	Letter from applicant concerning milestone dates for Unit 2.
April 10, 1984	Letter from applicant transmitting proposed Amendment 38 to License No. NPF-14 and Proposed Amendment 1 to License No. NPF-22.
April 10, 1984	Letter from applicant transmitting proposed Amendment No. 2 to License no. NPF-22.
April 12, 1984	Letter from applicant transmitting a response to NRC letter, dated November 8, 1983.
April 18, 1.84	Representatives from NRC and Pennsylvania Power & Light Company met in Bethesda, Maryland to discuss Main Steam Line - High Radiation Setpoint Technical Specification Change request. (Summary issued April 30, 1984)
April 24, 1984	Letter to applicant concerning feedwater check valve analysis.
April 24, 1984	Letter to applicant concerning Susquehanna Units 1 and 2 Annual Emergency Preparedness Exercise.
April 27, 1984	Letter to applicant concerning proposed Transco Gas Pipeline near the Susquehanna Site.
April 27, 1984	Letter from applicant transmitting one signed copy of Amendment 3 to Indemnity Agreement B-90.
May 1, 1984	Letter to applicant concerning Staff Review of Susquehanna DCRDR Summary Recommendations for the Resolution of Human Engineering Discrepancies.
May 1, 1984	Letter from applicant concerning Final Safety Analysis Report changes for radiation source terms and shielding.

May 1, 1984	Letter to applicant concerning Revision of Startup Test ST-2.
May 1, 1984	Letter from applicant concerning Final Safety Analysis Report changes for Radiation Source Terms and Shielding.
May 3, 1984	Letter from applicant transmitting proposed Amendment 3 to NPF-22 and Revision 1 to proposed Amendment 37 to License NPF-14.
May 4, 1984	Letter from applicant transmitting proposed Amendment 39 to License NPF-14 and proposed Amendment 4 to License NPF-22.
May 11, 1984	Letter to applicant requesting additional information regarding proposed Main Steam Line - High Radiation Setpoint Technical Specification Change.



# UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

PENNSYLVANIA POWER & LIGHT COMPANY

ALLEGHENY ELECTRIC COOPERATIVE, INC.

DOCKET NO. 50-388

SUSQUEHANNA STEAM ELECTRIC STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

License No. NPF-22 Amendment No.

- 1. The U. S. Nuclear Regulatory Commission (the Commission or the NRC) having found that:
  - A. The application for license by the Pennsylvania Power & Light Company and the Alleghany Electric Cooperative, Inc., (licensees), complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the regulations of the Commission;
  - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commissin's regulations and all applicable requirements have been satisfied.

- 2. Accordingly, for the Facility Operating License No. NPF-22, paragraph 2.C.(1) is hereby amended to read as follows:
  - (1) Maximum Power Level

Pennsylvania Power & Light Company (PP&) is authorized to operate the facility at reactor core power levels not in excess of 3293 megawatts thermal (100% power) in accordance with the conditions specified herein and in Attachment 1 to this license. The preoperational tests, startup tests and other items identified in Attachment 1 to this license shall be completed as specified. Attachment 1 is hereby incorporated into this license.

3. This license amendment is effective as of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Darrell G. Eisenhut, Director Division of Licensing Office of Nuclear Reactor Regulation

Date of Issuance:

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