

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
631 PARK AVENUE
KING OF PRUSSIA, PENNSYLVANIA 19406

APR 10 1984

Docket No. 50-388

MEMORANDUM FOR: Darrell G. Eisenhut, Director, Division of Licensing, NRR

FROM: Richard W. Starostecki, Director, Division of Project and Resident Programs

SUBJECT: SUSQUEHANNA UNIT 2 TECHNICAL SPECIFICATIONS COMPARISON WITH SELECTED AS-BUILT SYSTEMS TECHNICAL EVALUATION REPORT (TER)

Enclosed is the final TER dated March 30, 1984 prepared by Franklin Research Center (FRC) with assistance from Region I Staff. An audit of selected systems for compatibility with their corresponding Technical Specifications (TS) found no substantive discrepancies. A draft TER was previously submitted to you by my March 20, 1984 memorandum; this final report is essentially identical. Our previous conclusions regarding OL recommendation remain unaltered.

Equipment selected for this comparison included:

- 27 Containment Isolation Valves (PCIV's)
- 6 Vacuum Breakers (Drywell to Wetwell)
- 2 Automatic Depressurization Valves (SRV's)
- 12 sets of Secondary Containment Ventilation System Automatic Isolation Dampers
- Suppression Pool Water Volume (maximum and minimum water levels)
- Diesel Generator Fuel Oil Day Tank Level

The only notable discrepancy involved the lack of quantitative criteria (in the associated I&C surveillance procedures) for limit switch setting and calibration for the suppression chamber drywell vacuum relief breaker valves (vacuum breakers). This is described in TER Section 2.2, and is the subject of a proposed Notice of Deviation to be issued to the licensee in Inspection Report 50-388/84-12. The licensee's response to and corrective actions for this Deviation will be evaluated by Region I within the next several months, and in any case prior to your consideration for a full power license for Unit 2 (tentatively projected for June 1984).

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The significance of improperly calibrated limit switches would be to potentially allow vacuum relief breakers, which were inoperable in the open position (and yet indicated as fully closed), to bypass the suppression pool in case of an accident and possibly over pressurize the containment. TS 4.6.4 requires verification of valve operability by cycling each vacuum breaker through one complete cycle of full travel, and observing proper position indicator response. Also, calibration of the limit switches and verification of proper opening setpoint ($0.5 \text{ psid} \pm 5\%$) are required to be performed once per 18 months per TS. However, while FSAR Section 6.2.1.1.3.2 describes adjustment of the limit switches, no numerical criteria have been translated into I&C procedures.

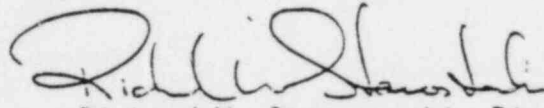
Other recommendations of the FRC report included:

- (1) addition to TS table 3.6.3-1 of those primary containment isolation valves ("first" valves, immediately outboard of primary containment) for which exemptions to local leak rate testing (Appendix J, Type C) were granted, but which are still treated in all other respects as PCIV's
- (2) when additional expected modifications to Standby Gas Treatment System (SGTS) are completed, those supply (or "cross-over") dampers to the Recirculation System plenum which in the present SGTS configuration (i.e., three-zone operation) do not provide a secondary containment isolation function, should be re-evaluated in that light when and if the system is returned to its original design (i.e. two-zone draw-down)
- (3) re-evaluation of both the high and low level alarm setpoints for suppression pool water volume following resolution of the discrepancy in the maximum value specified in the TS vs FSAR (the former being 1990 cubic feet greater than the latter)

Item (1) above represents a generic issue which has been identified at other plants, and is in that sense not restricted to Susquehanna alone. Items (2) and (3) are Susquehanna-specific and, for that reason, Region I recommends that NRR issue the enclosed TER to PP&L, requiring a response to and resolution of all recommendations and/or discrepancies described within (with the exception of the vacuum breaker limit switches, which will be resolved by Region I inspection).

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Finally, additional observations made by FRC during PCIV physical inspection raised a question concerning environmental qualification of certain NAMCO limit switches and junction boxes located inside primary containment (TER Section 2.7). We recommend this issue be followed as part of the Unit 2 license condition related to environment qualification, with resolution prior to March 31, 1985.



Richard W. Starostecki, Director
Division of Project and
Resident Programs

Enclosure:
FRC Technical Evaluation Report dated 3/30/84
"Audit of Susquehanna Unit 2 Technical Specifications"

cc: [unclear]
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