

10/20/83

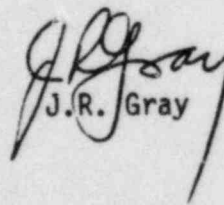
Note to: R. Perch
From: J.R. Gray
SUBJECT: AMENDMENT TO LICENSE CONDITION CHANGING DEADLINE FOR
ENVIRONMENTAL QUALIFICATION FOR SUSQUEHANNA-1

OELD has been asked to concur in a proposed license amendment which would change the deadline for the environmental qualification of certain equipment at Susquehanna-1. I have two problems with our proposal as expressed in the Notice.

First, the change would require environmental qualification of certain equipment in two years or by the end of the first refueling outage after the NRC comes up with a position on how to qualify the equipment, whichever is later. In essence, the proposed deadline is open-ended. That would not appear to be consistent with the requirements of 10 CFR § 50.49(g) which specify that equipment is to be qualified by the second refueling outage after March 31, 1982 or March 31, 1985, whichever is earlier. Under that regulation, the latest date to which the staff may extend qualification is November 30, 1985.

Second, and apart from the deadline problem noted above, the proposed Notice does not provide the NRC's proposed NSHC finding. Rather, it states what the licensee says about NSHC and indicates that the staff will review licensee's statement. Thus, in essence, the NRC has not made a proposed NSHC finding. The purpose of these notices is, among other things, to set forth the NRC's tentative determination on NSHC. You may adopt the licensee's bases for finding NSHC but it must be an NRC finding. The proposed notice is deficient in this regard.

Because of these problems, we are not prepared to concur in this proposed notice at this time.


J.R. Gray

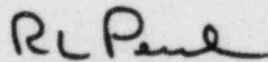
November 3, 1983

NOTE TO: J. R. Gray
FROM: R. L. Perch
VIA: M. Wagner
SUBJECT: AMENDMENT TO LICENSE CONDITION CHANGING DEADLINE FOR QUALIFICATION
OF EQUIPMENT SUBJECT TO SDV PIPE BREAK ENVIRONMENT

In response to your note dated 10/20/83, the requested change is outside the requirements of 10 CFR §50.49(g) and therefore does not require qualification prior to November 30, 1985. The subject is addressed in Section 4.6 of SSER 1, SSER 2, SSER 3 and SSER 4 throughout its development. The proposed deadline is no more open-ended than any other event or milestone oriented license condition (eg startup following first refueling).

The determination on NSHC has been modified based on discussions with M. Wagner and previous discussions with J. Scinto.

If you still have problems with the present content, please contact me to discuss viable alternatives.



R. L. Perch
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