

Joe Gray

July 18, 1983

Note to: Bob Perch, Project Manager, Susquehanna
From: Mack Cutchin, ^{Mack}Attorney, Susquehanna
SUBJECT: NSHC DETERMINATION ON T.S. AMENDMENT TO MODIFY
DIESEL START TEST REQUIREMENTS

You recently sent an amendment request package containing a proposed NSHC determination and Federal Register notice for OELD concurrence on a TS change involving diesel start tests on Susquehanna.

The notice merely states that the proposed change to TS 4.8.1.2.d.12:

- (1) would require that the diesel generator starts at least 5 times from ambient conditions and accelerates to at least 600 RPM in less than or equal to 10 seconds for the initial start and less than or equal to 25 seconds for each subsequent start in accordance with the licensees's application for amendment dated September 24, 1982; and
- (2) may result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan. One of the examples of actions involving no significant hazards consideration, example vi, applies to such a change (48 FR 14871).

The notice is far too cryptic. As a minimum, the description should say not only what the new TS will require that is different, but also what the old TS required so that a comparison can readily be made. It should also provide some explanation as to why the change fits the example cited and involves no specific circumstances that would lead to a conclusion other than that it does not involve a SHC. The background papers documenting the Staff's assessment appear to indicate that at least for the limiting LOCA (not the largest) the results are not affected at all by diesel start times of up to 25 seconds because the injection valve allowing water to go into the reactor will not open until 63 seconds after accident initiation. Can a similar conclusion be supported as to the impact of the change on the results of other accidents analyzed in Chapter 15 of the FSAR?

Until the notice and NSHC determination are modified to expand the discussion as indicated, I cannot recommend OELD concurrence in the amendment package.