Note to: R. Perch

From: J.R. Gray

Re: Proposed Notice and Preliminary No Significant Hazards Consideration Determination for Susquehanna License Amendment on Condition for Fire Protection

OELD has been asked to concur in a proposed notice and proposed NSHC determination for an amendment to the Susquehanna OL involving a licensing condition on fire protection. I am not prepared to concur in the proposed notice in its present form because I do not believe it adequately informs the public as to what the amendment involves and as to the basis for our proposed NSHC determination.

I believe that the description of the amendment is confusing. It states that the amendment would provide "changes to License Condition 2.C.(6) ... and would incorporate Revision 2 to the Susquehanna Steam Electric Station Fire Protection Review Report into the approved report ...." I don't know what this means. It seems to say that license condition 2.C.(6) will be changed and that some other license requirement will be changed to incorporate Revision 2 to the fire protection report "into the approved report," whatever that means (is there an "approved report" and a revision 2?). In actuality, it appears that there will be a single change to the license -- a modification to condition 2.C.(6) which, in effect, approves Revision 2 to the Fire Protection Review Report and requires licensee to maintain and implement the provisions of that approved revision. If that is the case, then the change to the license condition should be described and changes to the fire protection report which are being approved should be generally described.

In addition, the proposed basis for the NSHC determination is unclear. The notice properly focuses on changes in Revision 2 to the Fire Protection Review Report relative to the currently approved report. The notice indicates that the "bulk" of the changes are administrative in nature and that none of the changes involves a significant relaxation of the criteria used to establish safety limits or the bases for limiting safety system settings or LCOs. The problem here is that without a description of the proposed changes, it is not possible for the public to meaningfully comment on the adequacy of the bases for our proposed NSHC determination. Those changes that are administrative in nature and correct editorial and nomenclature errors are the subject of an example, given in the Commission's Statement of Consideration published with the "interim final" Sholly regulations, of a type of action which will involve NSHC. For such administrative changes, citation to the example in the Statement of Consideration provides a basis for the proposed NSHC finding. For any other changes, not administrative in nature, a different basis for the proposed NSHC finding (like the one provided in the presently proposed notice, if applicable) must be provided. (This is not a comment on the substantive adequacy of your proposed bases for

the NSHC finding but only a comment on the adequacy of notice of the bases given to the public.)

To better describe the proposed amendment and the bases for our proposed NSHC finding, I suggest the following changes to the notice:

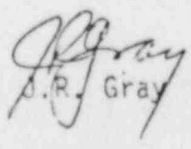
(1) Modify the second paragraph on p.1 of the notice to something like the following:

> The amendment would approve Revision 2 to the Susquehanna Steam Electric Station Fire Protection Review Report and change License Condition 2.C.(6) of Facility Operating Licensee No. NPF-14 to require the licensee to maintain and implement the provisions of such approved Fire Protection Review Report in accordance with the licensee's application for amendment dated January 31, 1983. The bulk of the proposed changes in Revision 2 to the Fire Protection Review Report are administrative in nature and were proposed to achieve consistency with the Technical Specifications and with the as-built condition of the plant and to correct editorial and nomenclature errors. The other changes in Revision 2 to the Fire Protection Review Report would [generally describe those changes which are not administrative in nature].

(2) Modify the first paragraph on p.2 of the notice to something like the following:

> The Commission has provided guidance concerning application of these standards by providing examples. (48 FR 14870). One of the examples of actions involving no significant hazards considerations relates to license amendments which are administrative in nature in order to achieve consistency throughout the technical specifications, to correct errors or to change nomenclature. On this basis, the Staff proposes to determine that those changes in Revision 2 to the Fire Protection Review Report which are administrative in nature (to correct editorial and nomenclature errors and achieve consistency with the Technical Specifications and as-built plant conditions) involve no significant hazards considerations. The Staff proposes to determine that the other changes involved in this license amendment involve no significant hazards considerations on the basis that such other changes [give basis for NSHC].

With changes to the proposed notice similar to the above, I would be prepared to concur in the adequacy of the notice (notice is not reviewed at this time for substantive adequacy of the basis given for the NSHC determination).



D.R. Gray