

CONFORMANCE TO GENERIC LETTER 83-28
ITEMS 3.1.3 AND 3.2.3
SUSQUEHANNA
STEAM ELECTRIC STATION UNIT NO. 2

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ABSTRACT

This EG&G Idaho, Inc. report reviews the Susquehanna Steam Electric Station Unit No. 2 submittal for conformance to Generic Letter 83-28, items 3.1.3 and 3.2.3.

FOREWORD

This report is supplied as part of the program for evaluating licensee/applicant conformance to Generic Letter 83-28 "Required Actions based on Generic Implications of Salem ATWS Events." This work is conducted for the U.S. Nuclear Regulatory Commission, Office of Nuclear Reactor Regulation, Division of System Integration by EG&G Idaho, Inc., NRR and I & E Support Branch.

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CONFORMANCE TO GENERIC LETTER 83-28
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SUSQUEHANNA
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1. INTRODUCTION

On July 8, 1983, Generic Letter No. 83-28¹ was issued by D. G. Eisenhut, Director of the Division of Licensing, Nuclear Reactor Regulation, to all licensees of operating reactors, applicants for operating licenses, and holders of construction permits. This letter included required actions based on generic implications of Salem ATWS events. These requirements have been published in Volume 2 of NUREG-1000, "Generic Implications of ATWS Events at the Salem Nuclear Power Plant".²

This report documents the EG&G Idaho, Inc. review of the submittal from Susquehanna Steam Electric Station Unit No. 1 for conformance to items 3.1.3 and 3.2.3 of Generic Letter 83-28. The submittal and other documents utilized in this evaluation are referenced in Section 4 of this report.

2. REVIEW REQUIREMENTS

Item 3.1.3 (Post-maintenance Testing of Reactor Trip System Components) requires licensees and applicants to identify, if applicable, any post-maintenance test requirements for the reactor trip system (RTS) in existing technical specifications which can be demonstrated to degrade rather than enhance safety. Item 3.2.3 extends this same requirement to include all other safety-related components. Any proposed technical specification changes resulting from this action shall receive a pre-implementation review by NRC.

The relevant submittal for Susquehanna Steam Electric Station Unit No. 1 was reviewed to determine compliance with items 3.1.3 and 3.2.3 of the Generic Letter. First, the submittal for this plant was reviewed to determine that these two items were specifically addressed. Second, the submittal was checked to determine if there were any post-maintenance test items specified by the technical specifications that were suspected to degrade rather than enhance safety. Last, the submittal was reviewed for evidence of special conditions or other significant information relating to the two items of concern.

The BWR Owners Group is presently addressing Generic Letter 83-28 item 4.5.3³ which may result in proposed changes to the technical specification requirements for surveillance testing frequency and out-of-service intervals for surveillance testing. The primary concern of item 4.5.3 is the surveillance testing intervals. Items 3.1.3 and 3.2.3 are specifically directed at post-maintenance test requirements. These concerns are essentially independent. However, the evaluations of these concerns are coordinated so that any correlation between these concerns will be adequately considered. Since no specific proposal to change the technical specifications has been proposed, there is no identifiable need at this time for correlating the reviews of item 4.5.3 with this review.

4. REFERENCES

1. NRC Letter, D. G. Eisenhower to all Licensees of Operating Reactors, Applicants for Operating License, and Holders of Construction Permits, "Required Actions Based on Generic Implications of Salem ATWS Events (Generic Letter 83-28)", July 8, 1983.
2. Generic Implications of ATWS Events at the Salem Nuclear Power Plant, NUREG-1000, Volume 1, April 1983; Volume 2, July 1983.
3. BWR Owners' Group Responses to NRC Generic Letter 83-28, Item 4.5.3, General Electric Company Proprietary Information, NEDC-30844, January 1985.
4. Pennsylvania Power & Light Company letter to NRC, N. W. Curtis to D. G. Eisenhower, Director, Division of Licensing, NRC, "Susquehanna Steam Electric Station, Response to Generic Letter 83-28, ER 100450/100508 File 841-2, PLA-1827," November 4, 1983.

3. REVIEW RESULTS FOR SUSQUEHANNA STEAM ELECTRIC STATION UNIT NO. 2

3.1 Evaluation

Pennsylvania Power & Light Company, the licensee for Susquehanna Steam Electric Station Unit No. 1 provided responses to items 3.1.3 and 3.2.3 of Generic Letter 83-28 on November 4, 1983.⁴ Within the responses, the licensee's evaluation for items 3.1.3 and 3.2.3 is that, following a review of the technical specifications, there were no post-maintenance test requirements identified for the reactor trip system or other safety-related components which tended to degrade rather than enhance plant safety.

3.2 Conclusion

Based on the licensee's statement that they have reviewed their technical specification requirements to identify any post maintenance testing which could be demonstrated to degrade rather than enhance safety and found none that degraded safety, we find the licensee's responses acceptable.

The licensee's commitment to pursue this concern through his participation in the BWROG Technical Specification Review Committee provides additional assurance that the technical specifications will continue to provide a basis for safe plant operation and is acceptable.