

January 8, 2002

Mr. Robert G. Byram
Senior Vice President
and Chief Nuclear Officer
PPL Susquehanna, LLC
2 North Ninth Street
Allentown, PA 18101

SUBJECT: SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2 - REQUEST
FOR ADDITIONAL INFORMATION RE: AMENDMENT REQUEST TO REVISE
MAIN STEAM RELIEF VALVE SETPOINT TOLERANCE (TAC NOS. MB3273
AND MB3274)

Dear Mr. Byram:

By letter dated October 18, 2001, PPL Susquehanna, LLC (PPL), proposed an amendment to modify the Susquehanna Steam Electric Station, Units 1 and 2, Technical Specifications to revise the allowable tolerance for the main steam relief valve setpoints for as-found testing. The Nuclear Regulatory Commission staff has reviewed PPL's request and has determined that additional information is required in order to complete our review. The additional information required is described in the enclosure.

This information request has been discussed with members of your staff and they have indicated that you would provide your response to the enclosed request by January 31, 2002. If you have any questions regarding this request, please contact me at (301) 415-1427.

Sincerely,

/RA/

Daniel S. Collins, Project Manager, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-387 and 50-388

Enclosure: Request for Additional
Information

cc w/encl: See next page

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Units 1 & 2

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REQUEST FOR ADDITIONAL INFORMATION
RELATED TO REQUEST TO REVISE
MAIN STEAM RELIEF VALVE SETPOINT TOLERANCE
PPL SUSQUEHANNA, LLC
ALLEGHENY ELECTRIC COOPERATIVE, INC.
SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2
DOCKET NOS. 50-387 AND 50-388

1. Discuss any differences in the Susquehanna Steam Electric Station, Units 1 and 2 (SSES-1 and 2), core designs and their effects on the transient analyses of abnormal operational occurrences, and the analysis of the design-basis overpressurization event when the analyses are performed using a $\pm 3\%$ setpoint tolerance for the main steam relief valves (MSRVs).
2.
 - a. How many MSRVs are taken credit for in the analysis of the design-basis overpressurization event?
 - b. Discuss the results of the design-basis overpressurization event analysis when conducted using a $\pm 3\%$ setpoint tolerance for the MSRVs.
 - c. Discuss/compare the determination of the limiting transient for 1% and 3% setpoint tolerances.
3. Attachment 1 to the application, Section III.a notes that, "the fuel physics cycle calculation for Loss of Pressure Control for Rod Withdrawal Error performed in accordance with Nuclear Fuels Instruction ... [is] analyzed using the relief mode of the MSRVs". Discuss this analysis and its relevance to the requested amendment.
4. Attachment 1 to the application, Section III.b summarizes the General Electric, NEDC-31753P, "BWROG In Service Pressure Relief Technical Specification Revision Licensing Topical Report, Loss-of-Coolant Accident (LOCA) evaluation. However no plant-specific discussion for SSES-1 or 2 is provided. Although the Nuclear Regulatory Commission (NRC) staff has previously reviewed and approved NEDC-31753P, the NRC staff notes that the topical report is based on General Electric (GE) fuel core designs whereas PPL Susquehanna, LLC (PPL), is not currently using GE fuel. Therefore, provide plant-specific LOCA evaluations for SSES-1 and 2 using the $\pm 3\%$ MSRV setpoint tolerance and the current SSES-1 and 2 core designs, or, provide information to demonstrate that the NEDC-31753P LOCA evaluation is applicable to non-GE fuel core designs.

Enclosure

5. The application states that the requested $\pm 3\%$ MSRV setpoint tolerance will apply only to as-found testing and that as-left testing would still be subject to the current $\pm 1\%$ tolerance. The proposed technical specifications (TSs) do not make this distinction between the as-found and as-left acceptance criteria clear. Provide revised markups that clearly specify the differences between the allowable tolerances for the as-found and as-left testing.
6. As discussed in a conference call between the NRC staff and PPL staff on November 20, 2001, the American Society of Mechanical Engineers (ASME) Code Relief Request for high pressure coolant injection (HPCI) main pump discharge piping is not an appropriate mechanism for PPL to make the requested change. The requirements of Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.55a, for the design of ASME Code Class 2 components including piping were incorporated into the regulations after the date that the SSES-1 and 2 Construction Permit applications were docketed and, thus, do not apply to the design of SSES-1 and 2. The proposed change must be evaluated under 10 CFR 50.59. If the proposed change is found to meet any of the criteria in 10 CFR 50.59(c)(2), then a license amendment shall be obtained.

In light of the above discussion, the NRC staff notes that, with regard to the HPCI main pump discharge line, Attachment 1 to the application, Section III.f, merely references the relief request and provides no other evaluation or justification for the requested change. In order to complete our evaluation of the related proposed TS change, provide the results of PPL's 50.59 evaluations of the proposed change with respect the HPCI main pump discharge line, and discuss whether a license amendment is required for the HPCI main pump discharge line.

January 8, 2001

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