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CURTIS,N.W. Pennsylvania Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
SCHWENCER,A. Licensing Branch 2

SUBJECT: Forwards application to amend License NPF-14,reviing Tech Specs re removal of 50-degree blocking requirements,per NUREG-0737 Item II.E.4.2 rev of isolation times & rev of bases for consistency w/Unit 2 bases.

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[illegible] [illegible]

[illegible] Pennsylvania Power & Light Co.

[illegible] Electrical Application

[illegible] Licensing Branch 2

[illegible]: Applicants application to amend license [illegible] Pages for removal of 50-degree blocking requirements, [illegible] Item II.4.c. Pay of isolation times & row of buses for consistency within 2 buses.

[illegible]: [illegible] __ [illegible]: _____

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Norman W. Curtis
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SEP 07 1984

Director of Nuclear Reactor Regulation
Attention: Mr. A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION
PROPOSED AMENDMENT 46 TO LICENSE NO. NPF-14
ER 100450 FILE 841-8
PLA-2293 Docket No. 50-387

Dear Mr. Schwencer:

Presently, the Susquehanna SES Unit 1 and Unit 2 Technical Specifications differ with respect to containment purge valve blocking and closure times, as well as their associated Bases. PP&L plans to complete modifications during the first refueling outage for Unit 1 which will render the valves fully qualified, at which time the Technical Specifications can be made consistent.

The purpose of this letter is to propose those changes to the Unit 1 Technical Specifications; they include the items described below:

A. Removal of 50° blocking requirement. (See Attachment A page 1). This requirement was enacted per NRC direction as outlined in NUREG 0737, Item II.E.4.2. In SSER 6 (NUREG 0776), the NRC approved the operability of the subject valves from their full-open position.

B. Revision of isolation times. (See Attachment A page 2). The maximum isolation times currently specified in the Unit 1 Technical Specifications are consistent with the information originally presented in the FSAR to support the containment isolation design basis, i.e., maintaining offsite doses within 10CFR100 limits. Based on subsequent NRC concerns about the integrity of the Standby Gas Treatment System in a post-LOCA environment, the NRC's current position, as evidenced in the Susquehanna SES Unit 2 Technical Specifications, is that the subject valves will all close within 15 seconds.

C. The Unit 1 Bases have been proposed for revision consistent with the existing Unit 2 Bases in the subject area.

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NO SIGNIFICANT HAZARDS CONSIDERATIONS

The proposed changes do not:

(1) involve a significant increase in the probability or consequences of an accident previously evaluated,

(2) create the possibility of a new or different kind of accident from any accident previously evaluated, or

(3) involve a significant reduction in a margin of safety.

For items A and B above, this assessment is based on example (v) of amendments that are considered not likely to involve significant hazards considerations in 48FR14870:

> "Upon satisfactory completion of construction in connection with an operating facility, a relief granted from an operating restriction that was imposed because the construction was not yet completed satisfactorily. This is intended to involve only restrictions where it is justified that construction has been completed satisfactorily."

PP&L's justification to do the physical work on Unit 1 was approved by the NRC in SSER 6 as noted above; the identical work has already been completed on Unit 2, as evidenced by the approved Unit 2 Technical Specifications.

For item C above, the assessment is based on our belief that the issue is purely administrative and therefore falls under "...a change in nomenclature", per 48FR14870.

As these physical changes will be performed during the first refueling outage, PP&L requests that NRC approval be conditioned to become effective upon startup following the completion of that outage.

Any questions on this proposed amendment should be directed to Mr. R. Sgarro at (215) 770-7855. Pursuant to 10CFR170.22, the appropriate fees are enclosed.

Very truly yours,

N. W. Curtis
Vice President-Engineering & Construction-Nuclear

cc: R. L. Perch - USNRC

T. M. Gerusky, Director
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