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AUG 3 1 2001

U. S. Nuclear Regulatory Commission
Attn.: Document Control Center
Mail Station OP1-17
Washington, D. C. 20555

**SUSQUEHANNA STEAM ELECTRIC STATION
REQUEST FOR REVISION TO AMENDMENT 184
TO LICENSE NPF14 AND AMENDMENT 158 TO
LICENSE NPF22 TO EXTEND THE IMPLEMENTATION
DATE: REVISED RESPONSE TO GL 94-02:
LONG-TERM STABILITY SOLUTION
PLA-5356**

**Docket Nos. 50-387
and 50-388**

The purpose of this letter is to request a change in implementation date for the Oscillation Power Range Monitor (OPRM) from November 1, 2001 to November 1, 2003. This revised date will provide sufficient time to correct the OPRM trip setpoint methodology described below.

At Susquehanna Steam Electric Station (SSES), the OPRM trip function is not yet operational. This change in implementation date is necessary because a recent 10CFR21 report, issued by General Electric on June 29, 2001, identified a deficiency in the OPRM trip setpoint methodology. The SSES setpoints are affected by this Part 21 report. PPL could implement the OPRM trip function on November 1, 2001 as approved by Amendments 184 and 158; however, it would have to be declared inoperable immediately after being activated and a 120 day dual unit shutdown LCO would be entered. This situation is undesirable and presents an unnecessary challenge to continued plant operation. We have discussed the need for this change with the SSES NRC Project Manager.

There are no safety consequences as a result of this change in implementation date. SSES is presently operating under Interim Corrective Actions (ICAs) defined in Technical Specification Section 3.4.1 that define restrictions to plant operation and define operator

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response to instability events. These actions are the interim actions accepted by the NRC for core protection until the Long Term Solution Option III protection system is installed at SSES.

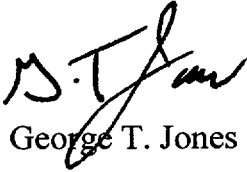
When the issues with the OPRM system have been resolved, PPL will review all the pertinent supporting documentation that formed the basis for the Safety Evaluation of Amendments 184 and 158 and confirm that these documents and the basis for amendment approval are unaffected. Note that it is also our intent to submit a future amendment to: 1) remove the OPRM setpoints from Technical Specifications and place them in the COLR; 2) request an exemption from Technical Specification 3.0.4 for the OPRM; and 3) remove the 120 day LCO associated with the OPRM from Technical Specifications. These changes, which have been approved for other BWR's, will be requested at a later date when the issues associated with trip setpoint methodology are resolved. These changes will make the SSES specifications consistent with other BWR plant Technical Specifications.

Following is a listing of references which provide additional detail about the resolution of the Long Term Stability Issue for SSES:

1. *Nerses to Byram letter, "Susquehanna Steam Electric Station Units 1 and 2 (TAC NOS. MA2271 and MA2445)" (Amendments 184 and 158), dated July 30, 1999.*
2. *PLA-5164, "Request for Amendment to Extend the Implementation Date for Amendment No. 184 to License NPF-14 and Amendment No. 158 to License NPF-22: Revised Response to GL 94-02: Long Term Stability Solution", dated March 14, 2000.*
3. *Schaaf to Byram letter, "Susquehanna Steam Electric Station, Units 1 & 2 - Issuance of Amendment RE: Change of Implementation Date for Amendment No. 184 for Unit 1 and Amendment No. 158 for Unit 2 (TAC Nos. MA8479 and MA8480)", dated June 2, 2000.*
4. *GE Letter 01-01NRC.DOC (MFN 025-01), "Stability Reload Licensing Calculations Using Generic DIVOM Curve," dated June 29, 2001.*
5. *NEDO-32465, "Reactor Stability Detect and Suppress Solutions Licensing Basis Methodology for Reload Applications," dated August 1996.*
6. *PLA-4195, "Response to Generic Letter 94-02: Long-term Solutions and Upgrade of Interim Operating Recommendations for Thermal-hydraulic Instabilities in Boiling Water Reactors", dated September 12, 1994.*

If you have any questions, please contact Mr. D. L. Filchner at (610) 774-7819.

Sincerely,



George T. Jones

Attachment: Affidavits

copy: NRC Region I
Mr. S. L. Hansell, NRC Senior Resident Inspector
Mr. R. G. Schaaf, NRC Project Manager
Mr. D. J. Allard, Pennsylvania DEP/BRP

**BEFORE THE
UNITED STATES NUCLEAR REGULATORY COMMISSION**

In the Matter of _____ :

PPL Susquehanna, LLC:

Docket No. 50-387

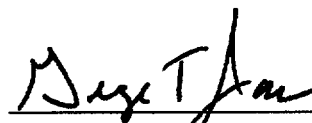
**REQUEST TO EXTEND THE IMPLEMENTATION
DATE FOR AMENDMENT NO. 184
TO FACILITY OPERATING LICENSE NO. NPF-14
SUSQUEHANNA STEAM ELECTRIC STATION
UNIT NO. 1**

Licensee, PPL Susquehanna, LLC, hereby files a revision to Amendment No. 184 to its Facility Operating License No. NPF-14 dated July 17, 1982.

This amendment contains a revision to the Susquehanna SES Unit 1 Technical Specifications.

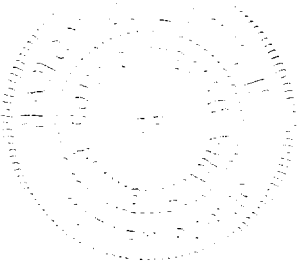
PPL Susquehanna, LLC

By:

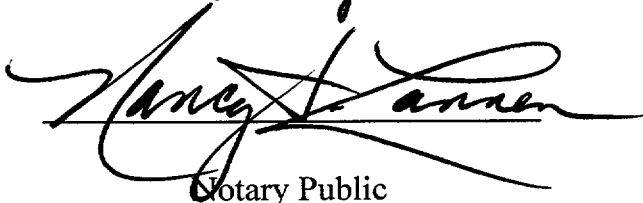


George T. Jones

Vice-President, Nuclear Engineering & Support



Sworn to and subscribed before me
this 31ST day of August, 2001.



Notary Public

Notarial Seal
Nancy J. Lannen, Notary Public
Allentown, Lehigh County
My Commission Expires June 14, 2004

**BEFORE THE
UNITED STATES NUCLEAR REGULATORY COMMISSION**

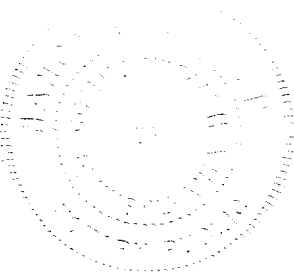
In the Matter of :
PPL Susquehanna, LLC : Docket No. 50-388

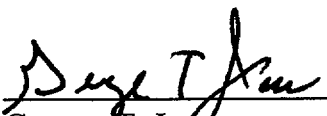
**REQUEST TO EXTEND THE IMPLEMENTATION
DATE FOR AMENDMENT NO. 158
TO FACILITY OPERATING LICENSE NO. NPF-22
SUSQUEHANNA STEAM ELECTRIC STATION
UNIT NO. 2**

Licensee, PPL Susquehanna, LLC, hereby files a revision to Amendment No. 158 to its Facility Operating License No. NPF-22 dated March 23, 1984.

This amendment contains a revision to the Susquehanna SES Unit 2 Technical Specifications.

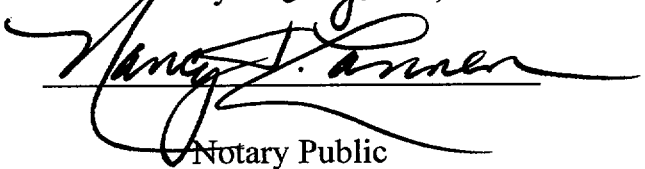
PPL Susquehanna, LLC
By:





George T. Jones
Vice-President, Nuclear Engineering & Support

Sworn to and subscribed before me
this *31st* day of *August*, 2001.



Notary Public

Notarial Seal
Nancy J. Lannen, Notary Public
Allentown, Lehigh County
My Commission Expires June 14, 2004

Attachment 1 to PLA-5356

**No Significant Hazards Considerations
and Environmental Assessment**

NO SIGNIFICANT HAZARDS CONSIDERATIONS AND ENVIRONMENTAL ASSESSMENT

PPL has evaluated the proposed amendment implementation extension in accordance with the criteria specified by 10 CFR 50.92 and has determined that the proposed change does not involve a significant hazards consideration. The criteria and conclusions of our evaluation are presented below.

Presently, SSES is operating under Interim Corrective Actions (ICAs) defined in Technical Specification Section 3.4.1 that define restrictions to plant operation and define operator response to instability events. These actions are the interim actions accepted by the NRC for core protection until the Long Term Solution Option III protection system is installed at SSES. It should also be noted that PPL complies with the revised ICA's as discussed in Reference 6.

Therefore, compliance with the Technical Specifications and the NRC's Safety Evaluation Report (Reference 3) provide the basis for acceptability of this implementation date extension. The existing operating restrictions reduce the probability of thermal-hydraulic oscillations by prohibiting operation in defined areas of the Power/Flow Map prone to unstable behavior, and by terminating plant operation when unstable operation is observed.

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed amendment implementation date extension is administrative in nature and does not require any physical plant modifications, physically affect any plant systems or components, or entail changes in plant operation. The resulting consequences of transients and accidents will remain within the NRC approved criteria. Therefore, the proposed action does not involve an increase in the probability or consequences of an accident previously evaluated.

2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed amendment implementation date extension is administrative in nature and does not require any physical plant modifications, physically affect any plant systems or components, or entail changes in plant operation. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed change does not involve a significant reduction in a margin of safety.

The proposed amendment implementation date extension is administrative in nature and does not require any physical plant modifications, physically affect any plant systems or components, nor entail changes in plant operation. Since the proposed changes do not affect the physical plant or have any impact on plant operation, the proposed changes will not jeopardize or degrade the function or operation of any plant system or component. Therefore, the proposed change does not involve a significant reduction in the margin of safety.

ENVIRONMENTAL CONSEQUENCES

An environmental assessment is not required for the proposed change because the requested change conforms to the criteria for actions eligible for categorical exclusion as specified in 10 CFR 51.22(c)(9). The requested change will have no impact on the environment. The proposed change does not involve a significant hazards consideration as discussed above. The proposed change does not involve a significant change in the types or significant increase in the amounts of any effluents that may be released offsite. In addition, the proposed change does not involve a significant increase in the individual or cumulative occupational radiation exposure.