

Robert G. Byram
Senior Vice President and
Chief Nuclear Officer

PPL Susquehanna, LLC
Two North Ninth Street
Allentown, PA 18101-1179
Tel. 610.774.7502 Fax 610.774.5019
rgbyram@pplweb.com



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

**SUSQUEHANNA STEAM ELECTRIC STATION
FOLLOW UP RESPONSE TO NRC NOTICE OF
VIOLATION 50-387/98-09A AND 50-388/98-09A
ON THE USE OF ADS AND CORE SPRAY FOR
POST-FIRE SAFE SHUTDOWN
PLA-5355**

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

References:

1. *Letter, J. T. Wiggins to R. G. Byram, "Notice of Violation and NRC Special Inspection Reports Nos. 50-387/98-09 and 50-388/98-09", dated October 19, 1998.*
2. *PLA-5016, R. G. Byram to USNRC, "Response to NRC Fire Protection Functional Inspection (NRC Inspection Report Nos. 50-387/98-09 & 50-388/98-09)", dated December 30, 1998.*
3. *PLA-5074, R. G. Byram to USNRC, "Follow Up Response to NRC Fire Protection Functional Inspection (NRC Inspection Report Nos. 50-387/98-09 & 50-388/98-09)", dated June 23, 1999.*
4. *Letter, S. A. Richards to J. M. Kenny, Chairman BWROG, "BWR Owners Group Appendix R Fire Protection Committee Position on SRVs + Low Pressure Systems used as 'Redundant' Shutdown Systems Under Appendix R (Topical Report GE-NE-T43-0002-00-03-R01)", dated December 12, 2000.*
5. *PLA-5278, R. G. Byram to USNRC, "Fire Protection Corrective Actions", dated January 31, 2001.*

This letter provides PPL's final response to NRC Notice of Violation (NOV) 50-387/98-09A and 50-388/98-09A on the use of the Automatic Depressurization System (ADS) and Core Spray System as stated in Reference 5. This NOV was initially identified as Unresolved Items (URI) 97-201-03 during the Susquehanna Steam Electric Station (SSES) Fire Protection Functional Inspection (FPFI).

In Reference 2, PPL's initial response the NRC NOV, the following information was provided:

"PPL will perform a study to determine the efficacy of revising the minimum water level for operator initiation of ADS such that downcomer water level remains above TAF. Upon confirmation that the revised minimum water level

IE01
A006

meets all pertinent requirements, PPL will initiate appropriate revisions to plant procedures, engineering documentation, and licensing documentation, and will implement the requisite operator training.”

“PPL will complete the study described above and inform the NRC Sr. Resident Inspector of the results by July 1, 1999. At that time, based on the study results, PPL will provide the Inspector with our schedule for either completion of the follow-up actions described above, or with an alternate course of action to achieve full compliance.”

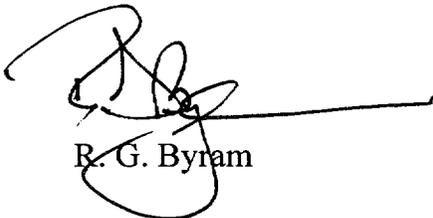
In Reference 3, PPL provided a follow-up response to the NOV. This follow-up response stated that PPL had completed its commitment to perform a study to determine the efficacy of revising the minimum water level for operator initiation of ADS (a subset of SRVs) such that downcomer water level remains above top of active fuel (TAF). PPL also stated that the BWROG had submitted a position paper on the use of safety relief valves (SRV) and low-pressure systems as redundant safe shutdown paths for NRC review. Finally, PPL stated that it would not implement any procedure changes until NRC review of the generic BWROG position paper was completed.

In Reference 4, NRC provided the results of their review of the BWROG’s position paper on the use of safety relief valves and low-pressure systems as redundant safe shutdown paths. The NRC concluded that the September 1, 1999, BWROG SRV/LPS position, as revised, establishes that SRV/LPS meets the requirements of a redundant means of post-fire safe shutdown under Section III.G.2 of 10 CFR Part 50, Appendix R.

PPL currently uses the Automatic Depressurization System and the Core Spray System for post-fire safe shutdown pathways under our commitment to Appendix R Section III.G.2 in a manner that is consistent with the BWROG position paper. PPL, therefore, concludes that PPL is in compliance with Appendix R, Section III.G.2.

If you have any questions, please contact Mr. Terry L. Harpster, Manager – Nuclear Licensing, at 610-774-7504.

Sincerely,



R. G. Byram

Copy: Regional Administrator - Region I
Mr. S. L. Hansell, NRC Sr. Resident Inspector
Mr. R. G. Schaaf, NRC Project Manager