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APR 2 2002

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

**SUSQUEHANNA STEAM ELECTRIC STATION
PROPOSED AMENDMENT NO. 246 TO LICENSE
NPF-14 AND PROPOSED AMENDMENT NO. 210 TO
LICENSE NPF-22: APPLICATION FOR TECHNICAL
SPECIFICATION CHANGE REGARDING MISSED
SURVEILLANCES USING THE CONSOLIDATED
LINE ITEM IMPROVEMENT PROCESS
PLA-5443**

**Docket No. 50-387
and 50-388**

In accordance with the provisions of 10 CFR 50.90, PPL Susquehanna, LLC is submitting a request for an amendment to the Technical Specifications for Susquehanna Units 1 and 2.

The proposed amendment would modify Technical Specification requirements for missed surveillances in SR 3.0.3.

Attachment 1 provides a description of the proposed change, the requested confirmation of applicability, and plant-specific verifications. Attachment 2 provides the existing Technical Specification pages marked up to show the proposed change. Attachment 3 provides revised "Camera Ready" TS pages. Attachment 4 provides a summary of the regulatory commitments made in this submittal. Attachment 5 provides the existing TS Bases pages marked up to show the proposed change (for information only).

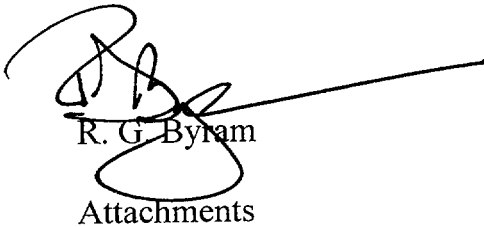
We request approval of the proposed License Amendment by June 30, 2002, with the amendment being implemented within 60 days following approval. The NRC recently approved similar submittals for Fermi 2 and Point Beach.

A001

In accordance with 10CFR 50.91, a copy of this application, with attachments, is being provided to the designated Pennsylvania Official.

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

Sincerely,



R. G. Byram
Attachments

cc: NRC Region I
Mr. S. L. Hansell, NRC Sr. Resident Inspector
Mr. T. G. Colburn, NRC Sr. Project Manager
Mr. D. J. Allard, DEP

**BEFORE THE
UNITED STATES NUCLEAR REGULATORY COMMISSION**

In the Matter of _____ :

PPL Susquehanna, LLC:

Docket No. 50-387

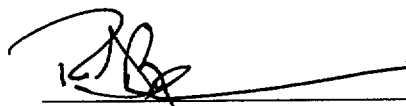
**PROPOSED AMENDMENT NO. 246
TO LICENSE NPF-14: APPLICATION FOR TECHNICAL
SPECIFICATION CHANGE REGARDING MISSED
SURVEILLANCES USING THE CONSOLIDATED LINE ITEM
IMPROVEMENT PROCESS
UNIT NO. 1**

Licensee, PPL Susquehanna, LLC, hereby files a Proposed Amendment No. 246 in support of a revision to its Facility Operating License No. NPF-14 dated July 17, 1982.

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

PPL Susquehanna, LLC

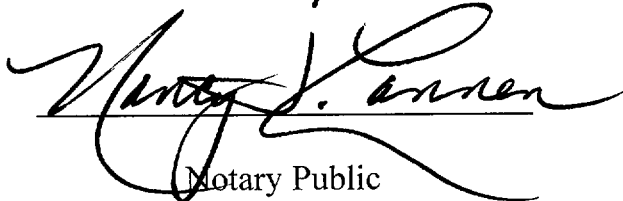
By:



R. G. Byram

Sr. Vice-President and Chief Nuclear Officer

Sworn to and subscribed before me
This *2nd* day of *April*, 2002.



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

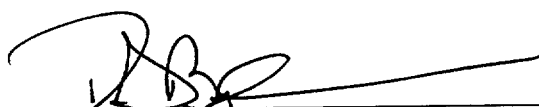
**PROPOSED AMENDMENT NO. 210
TO LICENSE NPF-22: APPLICATION FOR TECHNICAL
SPECIFICATION CHANGE REGARDING MISSED
SURVEILLANCES USING THE CONSOLIDATED LINE ITEM
IMPROVEMENT PROCESS
UNIT NO. 2**

Licensee, PPL Susquehanna, LLC, hereby files a Proposed Amendment No. 210 in support of a revision to its Facility Operating License No. NPF-22 dated March 23, 1984.

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

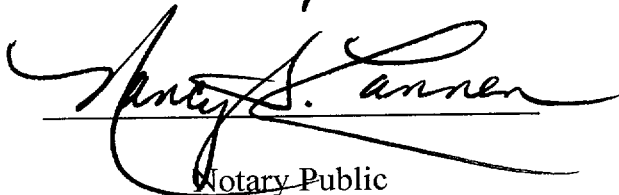
PPL Susquehanna, LLC

By:



R. G. Byram
Sr. Vice President and Chief Nuclear Officer

Sworn to and subscribed before me
this *2nd* day of *April*, 2002.



Notary Public

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

Attachment 1

Description, Applicability, and Verification of the Proposed Change

Description, Applicability, and Verification of the Proposed Change

1.0 DESCRIPTION

In accordance with 10 CFR 50.90, PPL Susquehanna, LLC (PPL) proposes to revise the Susquehanna Steam Electric Station (SSES) Units 1 and 2 Technical Specifications (TS). The proposed amendment would modify TS requirements for missed surveillances in Surveillance Requirement (SR) 3.0.3.

The proposed changes are consistent with Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification (STS) change TSTF – 358, Revision 5, as modified by *Federal Register* Notice 66FR32400, of June 14, 2001, and in response to public comments. The availability of this TS improvement was published in the *Federal Register* on September 28, 2001 (66FR49714) as part of the Consolidated Line Item Improvement Process (CLIIP).

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

PPL has reviewed the Safety Evaluation (SE) dated June 8, 2001 as part of the CLIIP. This review included a review of the NRC staff's evaluation, as well as the supporting information provided to support TSTF – 358. PPL has concluded that the justifications presented in the TSTF proposal and the SE prepared by the NRC staff are applicable to SSES Units 1 and 2 and justify this amendment for the incorporation of the changes to the SSES TS.

2.2 Optional Changes and Variations

PPL is not proposing any variations or deviations from the TS changes described in TSTF – 358 Revision 6 or the NRC staff's model SE dated June 8, 2001.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Determination

PPL has reviewed the proposed No Significant Hazards Consideration (NSHC) determination published in the *Federal Register* as part of the CLIIP. PPL has concluded that the proposed NSHC determination presented in the *Federal Register* notice is applicable to SSES and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

3.2 Verification and Commitments

As discussed in the notice of availability published in the *Federal Register* on September 28, 2001 for this TS improvement, plant-specific verifications were performed as follows:

PPL has established TS Bases for SR 3.0.3 which state that use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend surveillance intervals, but only for the performance of missed surveillances.

The modification will also include changes to the Bases for SR 3.0.3 that provide details on how to implement the new requirements. The Bases changes provide guidance for surveillance frequencies that are not based on time intervals but are based on specified unit conditions, operating situations, or requirements of regulations. In addition, the Bases changes state that PPL is expected to perform a missed surveillance test at the first reasonable opportunity, taking into account appropriate considerations, such as the impact on plant risk and accident analysis assumptions, consideration of unit conditions, planning, availability of personnel, and the time required to perform the surveillance. The Bases changes also state that the risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, "Assessing and Managing Risks Before Maintenance Activities at Nuclear Power Plants," and that the missed surveillance should be treated as an emergent condition, as discussed in Regulatory Guide 1.182. In addition, the Bases changes state that the degree of depth and rigor of the evaluation should be commensurate with the importance of the component and that missed surveillances for important components should be analyzed quantitatively. The Bases changes also state that the results of the risk evaluation determine the safest course of action. In addition, the Bases changes state that all missed surveillances will be placed in the PPL Corrective Action Program. Finally, PPL has a Bases Control Program consistent with Section 5.5 of the STS.

4.0 ENVIRONMENTAL EVALUATION

PPL has reviewed the environmental evaluation included in the model SE dated June 8, 2001 as part of the CLIIP. PPL has concluded that the staff's findings presented in that evaluation are applicable to SSES and the evaluation is hereby incorporated by reference for this application.

Attachment 2
Technical Specification Markups
(Units 1 & 2)

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

SR 3.0.1 SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

SR 3.0.2 The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.

For Frequencies specified as "once," the above interval extension does not apply.

If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is ~~less~~. This delay period is permitted to allow performance of the Surveillance.

TSTF-358
INSERT 3

greater

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be

(continued)

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

SR 3.0.1 SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

SR 3.0.2 The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.

For Frequencies specified as "once," the above interval extension does not apply.

If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is ~~less~~. This delay period is permitted to allow performance of the greater Surveillance.

TSTF-358
INSERT 3

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be

(continued)

TSTF – 358
INSERT 3

A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

Attachment 3

“Camera Ready” Technical Specifications

(Units 1&2)

SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

SR 3.0.1 SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

SR 3.0.2 The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.

For Frequencies specified as "once," the above interval extension does not apply.

If a Completion Time requires periodic performance on a "once per..." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be

(continued)

3.0 SURVEILLANCE REQUIREMENTS (SR) APPLICABILITY

SR 3.0.1 SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

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Exceptions to this Specification are stated in the individual Specifications.

SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be

(continued)

Attachment 4

List of Regulatory Commitments

LIST OF REGULATORY COMMITMENTS

The following Table identifies those actions committed to by PPL Susquehanna, LLC in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding these commitments to Mr. D. L. Filchner at (610) 774-7819.

REGULATORY COMMITMENTS	DUE DATE/EVENT
PPL will establish the Technical Specification Bases for SR 3.0.3 as adopted with the applicable license amendment.	To be implemented with amendment.

Attachment 5
TS Bases Markups

BASES

greater

SR 3.0.3
(continued)

period of up to 24 hours or up to the limit of the specified Frequency, whichever is ~~less~~, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

This delay period provides adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with Required Actions or other remedial measures that might preclude completion of the Surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements.

~~When a Surveillance with a Frequency based not on time intervals but upon specified unit conditions or operational situations is discovered not to have been performed when specified, SR 3.0.3 allows the full delay period of 24 hours to perform the Surveillance.~~

TSTF-358
INSERT 1

SR 3.0.3 also provides a time limit for completion of Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.

Failure to comply with specified Frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals.

TSTF-358
INSERT 2

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the

(continued)

BASES

greater

SR 3.0.3
(continued)

period of up to 24 hours or up to the limit of the specified Frequency, whichever is ~~less~~, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

This delay period provides adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with Required Actions or other remedial measures that might preclude completion of the Surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements.

TSTF-358
INSERT 1

~~When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions or operational situations, is discovered not to have been performed when specified, SR 3.0.3 allows the full delay period of 24 hours to perform the Surveillance.~~

~~SR 3.0.3 also provides a time limit for completion of Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.~~

TSTF-358
INSERT 2

Failure to comply with specified Frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals.

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the

(continued)

TSTF – 358
INSERT 1

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, SR 3.0.3 allows for the full delay period of up to the specified Frequency to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.

SR 3.0.3 provides a time limit for, and allowances for the performance of, Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.

TSTF – 358
INSERT 2

While up to 24 hours or the limit of the specified Frequency is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required or shutting the plant down to perform the Surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance. The risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown. The missed Surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillances will be placed in the Corrective Action Program.