

**Bryce L. Shriver**  
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OCT 30 2002

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

**SUSQUEHANNA STEAM ELECTRIC STATION  
SUPPLEMENT TO PROPOSED AMENDMENT NO. 211  
TO UNIT 2 LICENSE NFP-22: MCPR SAFETY LIMITS AND  
REFERENCE CHANGES  
PLA-5520**

**Docket No. 50-388**

- Reference: 1) PLA-5467, B. L. Shriver (PPL) to USNRC, "Proposed Amendment No. 211 to Unit 2 Licensee NPF-22: MCPR Safety Limits and Reference Changes", dated July 17, 2002.*
- 2) PLA-5509, B. L. Shriver (PPL) to USNRC, "Supplement to Proposed Amendment No. 243 to License NFP-14 and Proposed Amendment No. 207 to License NFP-22: Adoption of NRC Approved Generic Changes to Improved Technical Specifications", dated August 23, 2002.*

The purpose of this letter is to submit updated Technical Specification markup pages to Section 5.6.5, submitted by Reference 1, which contained the Unit 2 Cycle 12 MCPR Safety Limit Technical Specification change. This update was made necessary by PPL's August 23, 2002 submittal of Reference 2, which provides supplemental information and a revision to the October 16, 2001 submittal of Technical Specification Section 5.6.5 references. These changes are necessary for the NRC staff to complete its review of the license amendment proposed in Reference 1. These changes do not affect the No Significant Hazards Determination submitted with Reference 1. They were identified and discussed during a telecon between PPL and NRC on July 31, 2002. The markups provided are of the Technical Specification Section 5.6.5 pages included in Reference 2.

*Foot*

Attachment 1 to this letter contains the Technical Specification page markups and includes new camera-ready pages as requested.

Also included are camera-ready pages containing Technical Specification Section 5.7. These pages have been revised only to consolidate blank space that would otherwise unnecessarily exist. The content of Section 5.7 has not changed.

Should you have any questions or require additional information, please contact Mr. Duane L. Filchner at (610) 774-7819.

Sincerely,

A handwritten signature in black ink, appearing to read "B. L. Shriver". The signature is written in a cursive style with a large initial "B" and a stylized "S".

B. L. Shriver

Attachments: Affidavit  
Attachment 1 – Markups and Camera-Ready Pages

copy: NRC Region I  
Mr. S. Hansell, NRC Sr. Resident Inspector  
Mr. T. G. Colburn, NRC Sr. Project Manager  
Mr. R. Janati, DEP/BRP  
Mr. E. M. Thomas, NRC Project Manager

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**Attachment 1 to PLA-5520**

**PLA-5509 Markups and Camera-Ready Pages**

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BEFORE THE  
UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of \_\_\_\_\_ :

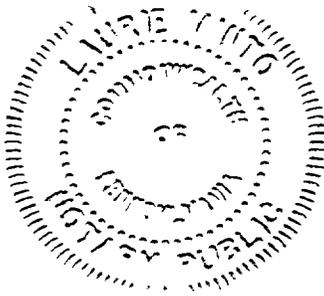
PPL Susquehanna, LLC:

Docket No. 50-388

**SUPPLEMENT TO PROPOSED AMENDMENT NO. 211  
TO UNIT 2 LICENSE NFP-22: MCPR SAFETY LIMITS AND  
REFERENCE CHANGES**

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

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



PPL Susquehanna, LLC

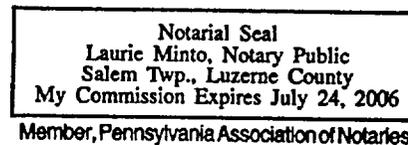
By:

B. L. Shriver

Sr. Vice President and Chief Nuclear Officer

Sworn to and subscribed before me  
this 30<sup>th</sup> day of October, 2002.

Notary Public



5.6 Reporting Requirements (continued)

core thermal power level may not exceed the originally approved RTP of 3441 Mwt, but the value of 3510 Mwt (102% of 3441 Mwt) remains the initial power level for the bounding licensing analysis.

Future revisions of approved analytical methods listed in this Technical Specification that are currently referenced to 102% of rated thermal power (3510 Mwt) shall include reference that the licensed RTP is actually 3489 Mwt. The revisions shall document that the licensing analysis performed at 3510 Mwt bounds operation at the RTP of 3489 Mwt so long as the LEFM™ system is used as the feedwater flow measurement input into the core thermal power calculation.

The approved analytical methods are described in the following documents, the approved version(s) of which are specified in the COLR.

1. PL-NF-90-001-A, "Application of Reactor Analysis Methods for BWR Design and Analysis."
2. XN-NF-80-19(P)(A), "Exxon Nuclear Methodology for Boiling Water Reactors," Exxon Nuclear Company, Inc.
3. XN-NF-85-67(P)(A), "Generic Mechanical Design for Exxon Nuclear Jet Pump BWR Reload Fuel," Exxon Nuclear Company, Inc.
4. ANF-524(P)(A), "Advanced Nuclear Fuels Corporation Critical Power Methodology for Boiling Water Reactors."
- ~~5. ANF-1125(P)(A), "ANFB Critical Power Correlation."~~
- ~~6. NEDC-32071P, "SAFER/CESTR LOCA Loss of Coolant Accident Analysis," GE Nuclear Energy~~
- 5 7. NE-092-001A, "Licensing Topical Report for Power Uprate With Increased Core Flow," Pennsylvania Power & Light Company.
- ~~8. PL-NF-94-005 P-A, "Technical Basis for SPC 9x9-2 Extended Fuel Exposure at Susquehanna SES."~~

(continued)

5.6 Reporting Requirements

5.6.5 COLR (continued)

- ~~9. NEDE 24011 P A 10, "General Electric Standard Application For Reactor Fuel."~~
- 6 ~~10.~~ ANF-89-98(P)(A), "Generic Mechanical Design Criteria for BWR Fuel Designs," Advanced Nuclear Fuels Corporation.
- 7 ~~11.~~ ANF-91-048(P)(A), "Advanced Nuclear Fuels Corporation Methodology for Boiling Water Reactors EXEM BWR Evaluation Model."
- ~~12. XN-NF-80-19(P)(A), "Exxon Nuclear Methodology for Boiling Water Reactors."~~
- ~~8~~ ~~13.~~ XN-NF-79-71(P)(A), "Exxon Nuclear Plant Transient Methodology for Boiling Water Reactors."
- 9 ~~14.~~ EMF-1997 (P)(A), "ANFB-10 Critical Power Correlation."
- 10 ~~15.~~ Caldon, Inc., "TOPICAL REPORT: Improving Thermal Power Accuracy and Plant Safety While Increasing Operating Power Level Using the LEFM™ System," Engineering Report - 80P.
- 11 ~~16.~~ Caldon, Inc., "Supplement to Topical Report ER-80P: Basis for a Power Uprate with the LEFM™ or LEFM CheckPlus™ System," Engineering Report ER-160P."
- ~~12~~ ~~17.~~ EMF-85-74P, "RODEX 2A (BWR) Fuel Rod Thermal-Mechanical Evaluation Model."

- c. The core operating limits shall be determined such that all applicable limits (e.g., fuel thermal mechanical limits, core thermal hydraulic limits, Emergency Core Cooling Systems (ECCS) limits, nuclear limits such as SDM, transient analysis limits, and accident analysis limits) of the safety analysis are met.
- d. The COLR, including any midcycle revisions or supplements, shall be provided upon issuance for each reload cycle to the NRC.

13. EMF-2158 (P)(A), "Siemens Power Corporation Methodology For Boiling Water Reactors," Evaluation and Validation of CASMO4/MICROBURN-B2, Siemens Power Corporation, Richland, WA. (continued)

## 5.6 Reporting Requirements

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core thermal power level may not exceed the originally approved RTP of 3441 MWt, but the value of 3510 MWt (102% of 3441 MWt) remains the initial power level for the bounding licensing analysis.

Future revisions of approved analytical methods listed in this Technical Specification that are currently referenced to 102% of rated thermal power (3510 MWt) shall include reference that the licensed RTP is actually 3489 MWt. The revisions shall document that the licensing analysis performed at 3510 MWt bounds operation at the RTP of 3489 MWt so long as the LEFM<sup>✓</sup>™ system is used as the feedwater flow measurement input into the core thermal power calculation.

The approved analytical methods are described in the following documents, the approved version(s) of which are specified in the COLR.

1. PL-NF-90-001-A, "Application of Reactor Analysis Methods for BWR Design and Analysis".
2. XN-NF-80-19(P)(A), "Exxon Nuclear Methodology for Boiling Water Reactors" Exxon Nuclear Company, Inc.
3. XN-NF-85-67(P)(A), "Generic Mechanical Design for Exxon Nuclear Jet Pump BWR Reload Fuel, "Exxon Nuclear Company, Inc.
4. ANF-524(P)(A), "Advanced Nuclear Fuels Corporation Critical Power Methodology for Boiling Water Reactors".
5. NE-092-001A, "Licensing Topical Report for Power Uprate With Increased Core Flow," Pennsylvania Power & Light Company.
6. ANF-89-98(P)(A) "Generic Mechanical Design Criteria for BWR Fuel Designs," Advanced Nuclear Fuels Corporation.
7. ANF-91-048(P)(A), "Advanced Nuclear Fuels Corporation Methodology for Boiling Water Reactors EXEM BWR Evaluation Model."
8. XN-NF-79-71(P)(A) "Exxon Nuclear Plant Transient Methodology for Boiling Water Reactors."
9. EMF-1997 (P)(A) "ANFB-10 Critical Power Correlation."
10. Caldon, Inc., "TOPICAL REPORT: Improving Thermal Power Accuracy and Plant Safety While Increasing Operating Power Level Using the LEFM<sup>✓</sup>™ System," Engineering Report - 80P.

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## 5.6 Reporting Requirements

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### 5.6.5 COLR (continued)

11. Caldon, Inc., "Supplement to Topical Report ER-80P: Basis for a Power Uprate with the LEFM<sup>✓</sup>™ or LEFM CheckPlus™ System," "Engineering Report ER-160P.
  12. EMF-85-74 (P)(A), "RODEX 2A (BWR) Fuel Rod Thermal-Mechanical Evaluation Model."
  13. EMF-2158(P)(A), "Siemens Power Corporation Methodology for Boiling Water Reactors: Evaluation and Validation of CASMO-4/Microburn-B2," Siemens Power Corporation.
- c. The core operating limits shall be determined such that all applicable limits (e.g., fuel thermal mechanical limits, core thermal hydraulic limits, Emergency Core Cooling Systems (ECCS) limits, nuclear limits such as SDM, transient analysis limits, and accident analysis limits) of the safety analysis are met.
- d. The COLR, including any midcycle revisions or supplements, shall be provided upon issuance for each reload cycle to the NRC.

### 5.6.6 EDG Failures Report

If an individual emergency diesel generator (EDG) experiences four or more valid failures in the last 25 demands, these failures and any nonvalid failures experienced by that EDG in that time period shall be reported within 30 days. Reports on EDG failures shall include the information recommended in Regulatory Guide 1.9, Revision 3, Regulatory Position C.4.

### 5.6.7 PAM Report

When a report is required by Condition B or F of LCO 3.3.3.1, "Post Accident Monitoring (PAM) Instrumentation," a report shall be submitted within the following 14 days. The report shall outline the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status.

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5.0 ADMINISTRATIVE CONTROLS

5.7 High Radiation Area

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5.7 High Radiation Areas

As provided in paragraph 20.1601(c) of 10 CFR Part 20, the following controls shall be applied to high radiation areas in place of the controls required by paragraph 20.1601(a) and (b) of 10 CFR Part 20:

5.7.1 High Radiation Areas with Dose Rates Less than or equal to 1.0 rem/hour at 30 Centimeters from the Radiation Source or from Any Surface Penetrated by the Radiation:

- a. Each entryway to such an area shall be barricaded and conspicuously posted as a high radiation area. Such barricades may be opened as necessary to permit entry or exit of personnel or equipment.
- b. Access to, and activities in, each such area shall be controlled by means of a Radiation Work Permit (RWP) or equivalent that includes specification of radiation protection equipment and measures.
- c. Individuals qualified in radiation protection procedures (e.g., radiation protection technicians) and personnel continuously escorted by such individuals may be exempted from the requirement for an RWP or equivalent while performing their assigned duties provided that they are following plant radiation protection procedures for entry to, exit from, and work in such areas.
- d. Each individual or group entering such an area shall possess:
  - (i) A radiation monitoring device that continuously displays radiation dose rates in the area; or
  - (ii) A radiation monitoring device, with an appropriate alarm setpoint, that continuously integrates the radiation dose rates in the area and alarms when the device's dose alarm setpoint is reached or
  - (iii) A radiation monitoring device that continuously transmits dose rate and cumulative dose to a remote receiver monitored by radiation protection

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(continued)

5.7 High Radiation Area

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5.7.1 (continued)

personnel responsible for controlling personnel radiation exposure within the area,  
or

- (iv) A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and be under the surveillance, as specified in the RWP or equivalent, while in the area, by means of closed circuit television, of personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area.
- e. Except for individuals qualified in radiation protection procedures, or individuals escorted by personnel qualified in radiation protection procedures, entry into such areas shall be made only after dose rates in the area have been evaluated and entry personnel are knowledgeable of them.

5.7.2 High Radiation Areas with Dose Rates Greater than 1.0 rem/hour at 30 Centimeters from the Source or from Any Surface Penetrated by the Radiation, but Less Than 500 rads/hour at 1 Meter from the Radiation Source or from Any Surface Penetrated by the Radiation:

- a. Each entryway to such an area shall be conspicuously posted as a high radiation area and shall be provided with a locked door or gate that prevents unauthorized entry, and, in addition:
  - (i) All such door and gate keys shall be maintained under administrative control of the shift supervisor, radiation protection manager, or his designee.
  - (ii) Doors and gates shall remain locked except during periods of personnel or equipment entry or exit.
- b. Access to, and activities in, each such area shall be controlled by means of an RWP or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures.

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(continued)

5.7 High Radiation Area

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5.7.2 (continued)

- c. Individuals qualified in radiation protection procedures may be exempted from the requirement for an RWP or equivalent while performing radiation surveys in such areas provided that they are following plant radiation protection procedures for entry to, exit from, and work in such areas.
- d. Each individual (whether alone or in a group) entering such an area shall possess:
  - (i) A radiation monitoring device that continuously integrates the radiation dose rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate alarm setpoint, or
  - (ii) A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area with the means to communicate with and control every individual in the area, or
  - (iii) A self reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and,
    - (a) Be under the surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area; who is responsible for controlling personnel exposure within the area, or
    - (b) Be under the surveillance, as specified in the RWP or equivalent, while in the area, by means of closed circuit television, of personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with and control every individual in the area, or,

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(continued)

5.7 High Radiation Area

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5.7.2 (continued)

- (iv) In those cases where options (ii) and (iii), above, are impractical or determined to be inconsistent with the "As Low As is Reasonably Achievable" principle, a radiation monitoring device that continuously displays radiation dose rates in the area may be used.
  - e. Except for individuals qualified in radiation protection procedures, or individuals escorted by personnel qualified in radiation protection procedures entry into such areas shall be made only after dose rates in the area have been evaluated and entry personnel are knowledgeable of them.
  - f. Such individual areas that are within a larger area that is controlled as a high radiation area, where no enclosure exists for the purpose of locking and where no enclosure can reasonably be constructed around the individual area need not be controlled by a locked door or gate, but shall be barricaded and conspicuously posted as a high radiation area, and a conspicuous, and clearly visible flashing light shall be activated at the area as a warning device.
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