

February 25, 2003

Mr. Bryce L. Shriver
Senior Vice President
and Chief Nuclear Officer
PPL Susquehanna, LLC
769 Salem Boulevard
Berwick, PA 18603-0467

SUBJECT: SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2 - ISSUANCE
OF AMENDMENT RE: ADOPTION OF GENERIC CHANGES TO IMPROVED
TECHNICAL SPECIFICATIONS (TAC NOS. MB3269 AND MB3270)

Dear Mr. Shriver:

The Commission has issued the enclosed Amendment No. 209 to Facility Operating License No. NPF-14 and Amendment No. 183 to Facility Operating License No. NPF-22 for the Susquehanna Steam Electric Station, Units 1 and 2 (SSES-1 and 2). These amendments consist of changes to the Technical Specifications (TSs) in response to your application dated October 16, 2001, as supplemented August 23, 2002, November 8, 2002, and January 20, 2003.

These amendments revise the SSES-1 and 2 TSs to incorporate seven industry-proposed Technical Specification Task Force changes (TSTFs) made to NUREG-1433, Revision 1, "Standard Technical Specifications for General Electric Plants (BWR/4)," that have been approved by the Nuclear Regulatory Commission.

A copy of our safety evaluation is also enclosed. Notice of Issuance will be included in the Commission's Biweekly *Federal Register* Notice.

Sincerely,

/RA/

Richard V. Guzman, Project Manager, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-387 and 50-388

Enclosures: 1. Amendment No. 209 to
License No. NPF-14
2. Amendment No. 183 to
License No. NPF-22
3. Safety Evaluation

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3. Safety Evaluation

cc w/encls: See next page

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PDI-1 Reading MO'Brien OGC ACRS BPlatchek, RGN-I RDennig

* Provided SE input by memo. No substantive changes made.

** See previous concurrence.

Accession No. ML030560811

OFFICE	PDI-1/PM	PDI-2/LA	RORP*	OGC**	PDI-1 SC
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DATE	02/25/03	2/25/03	SE dtd 10/21/02	02/24/03	2/25/03

OFFICIAL RECORD COPY

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PPL SUSQUEHANNA, LLC

ALLEGHENY ELECTRIC COOPERATIVE, INC.

DOCKET NO. 50-387

SUSQUEHANNA STEAM ELECTRIC STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 209
License No. NPF-14

1. The Nuclear Regulatory Commission (the Commission or the NRC) having found that:
 - A. The application for the amendment filed by PPL Susquehanna, LLC, dated October 16, 2001, as supplemented August 23, 2002, November 8, 2002, and January 20, 2003, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the regulations of the Commission;
 - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of the Facility Operating License No. NPF-14 is hereby amended to read as follows:

- (2) Technical Specifications and Environmental Protection Plan

- The Technical Specifications contained in Appendix A, as revised through Amendment No. 209 and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. PPL Susquehanna, LLC shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Richard J. Laufer, Chief, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: February 25, 2003

ATTACHMENT TO LICENSE AMENDMENT NO. 209

FACILITY OPERATING LICENSE NO. NPF-14

DOCKET NO. 50-387

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE

5.0-8
5.0-9
5.0-11
5.0-16
5.0-17
5.0-18
5.0-20
5.0-22
5.0-23
5.0-24

INSERT

5.0-8
5.0-9
5.0-11
5.0-16
5.0-17
5.0-18
5.0-20
5.0-22
5.0-23
5.0-24

PPL SUSQUEHANNA, LLC

ALLEGHENY ELECTRIC COOPERATIVE, INC.

DOCKET NO. 50-388

SUSQUEHANNA STEAM ELECTRIC STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 183
License No. NPF-22

1. The Nuclear Regulatory Commission (the Commission or the NRC) having found that:
 - A. The application for the amendment filed by the PPL Susquehanna, LLC, dated October 16, 2001, as supplemented August 23, 2002, November 8, 2002, and January 20, 2003, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the regulations of the Commission;
 - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of the Facility Operating License No. NPF-22 is hereby amended to read as follows:

- (2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 183 and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. PPL Susquehanna, LLC shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Richard J. Laufer, Chief, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: February 25, 2003

ATTACHMENT TO LICENSE AMENDMENT NO. 183

FACILITY OPERATING LICENSE NO. NPF-22

DOCKET NO. 50-388

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE

5.0-8
5.0-9
5.0-11
5.0-16
5.0-17
5.0-18
5.0-20
5.0-22
5.0-23
5.0-24

INSERT

5.0-8
5.0-9
5.0-11
5.0-16
5.0-17
5.0-18
5.0-20
5.0-22
5.0-23
5.0-24

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 209 TO FACILITY OPERATING LICENSE NO. NPF-14
AND AMENDMENT NO. 183 TO FACILITY OPERATING LICENSE NO. NPF-22
PPL SUSQUEHANNA, LLC
ALLEGHENY ELECTRIC COOPERATIVE, INC.
SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2
DOCKET NOS. 50-387 AND 388

1.0 INTRODUCTION

By application dated October 16, 2001, as supplemented August 23, 2002, November 8, 2002, and January 20, 2003, PPL Susquehanna, LLC (the licensee), requested changes to the Technical Specifications (TSs) for Susquehanna Steam Electric Station, Units 1 and 2 (SSES-1 and 2). The supplements dated August 23, 2002, November 8, 2002, and January 20, 2003, provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the staff's original proposed no significant hazards consideration determination as published in the *Federal Register* on December 12, 2001 (66 FR 64300).

The proposed changes would revise the SSES-1 and 2 TSs to incorporate seven industry-proposed Technical Specification Task Force changes (TSTFs) made to NUREG-1433, Revision 1, "Standard Technical Specifications [STs] for General Electric Plants (BWR/4)," that have been approved by the Nuclear Regulatory Commission (NRC).

The following table lists the changes that the seven TSTFs would incorporate into the SSES-1 and 2 TSs:

TSTF No.	Description of Changes to NUREG-1433 STs, Revision 1	Affected SSES TSs	Additional SSES-specific Changes
273, Rev 2	Clarifications to STS 5.5.12, "Safety Function Determination Program," and associated changes to Bases for Limiting Condition for Operation (LCO) 3.0.6	5.5.11, and Bases for LCO 3.0.6	None
279, Rev 0	Remove reference to "applicable supports" from STS 5.5.7, "Inservice Testing Program."	5.5.6	None

TSTF No.	Description of Changes to NUREG-1433 STSs, Revision 1	Affected SSES TSs	Additional SSES-specific Changes
299, Rev 0	Clarifies meaning of “refueling cycle” for system integrated leak test intervals in STS 5.5.2, “Primary Coolant Sources Outside Containment;” specifically STS 5.5.2.b. Also specifies that the provisions of STS SR 3.0.2 are applicable.	5.5.2, and 5.5.2.b	None
308, Rev 1	Clarifies STS 5.5.4, “Radioactive Effluent Controls Program,” to specify the intended Generic Letter 89-01 determination requirements for cumulative and projected dose contributions.	5.5.4	Change the terms “unrestricted area” and “site boundary” to lower case.
348, Rev 0	Revises STS 5.6.2, “Annual Radiological Environmental Operating Report,” to delete reference to collocated dosimeters to reflect cancellation of the NRC environmental monitoring program with States.	5.6.2	None
363, Rev 0	Reduces level of detail in citations of topical reports in ITS 5.6.5, “Core Operating Limits Report (COLR),” and adds requirement for full citations of topical reports in the COLR.	5.6.5	Adds EMF-85-74(P) to the list of approved analytical methods in TS 5.6.5. Removes topical reports that are no longer applicable to the SSES-1 and 2 cores.
364, Rev 0	Revision to TS 5.5.11, “Technical Specifications Bases Control Program,” to reflect changes to 10 CFR 50.59.	5.5.10	None

2.0 REGULATORY EVALUATION

The NRC staff approved the licensee’s application to adopt improved TSs (ITSs) in 1998. The SSES-1 and 2 ITSs were based on the model specifications in Revision 1 of the STSs, and on the previous SSES-1 and 2 TSs, plant design, and licensing bases. In this application, the licensee has proposed to adopt seven changes that were made to Revision 1 of the STSs subsequent to the licensee’s implementation of the SSES-1 and 2 ITSs.

Since Revision 1 of the STSs was published in 1995, industry and NRC staff have identified additional STS improvements (referred to by TSTF number). Following industry acceptance and NRC-staff approval, the NRC incorporated each TSTF into the STSs. In most cases, these changes are generally applicable to BWR/4 plants, and may be adopted by individual BWR/4

licensees for improving existing TSs, subject to plant-specific findings of applicability and an adequate safety basis. In 2001, the NRC published Revision 2 of the STSs, which incorporated all approved TSTF changes that had been made to Revision 1. Since then, additional TSTFs have been approved and incorporated into Revision 2.

Although each approved TSTF proposal (called a traveler) should contain an acceptable safety basis for the associated changes to the STSs, the NRC staff did not, prior to 2002, prepare a formal safety evaluation (SE) of the traveler to accompany the staff's approval letter to the Nuclear Energy Institute (NEI). This was consistent with the development of the STSs themselves. The staff also did not prepare SEs for the STSs, which were published as NUREGs, because they are considered to be guidance documents and are not of themselves legally binding on Part 50 licensees. (The generic acceptability of the model specifications in the STSs, however, is documented in the much expanded and improved Bases for the STSs.) Consequently, a licensee applying to incorporate a TSTF into its TSs must provide a plant-specific justification acceptable to the staff. If another licensee subsequently finds that this safety basis is applicable to its facility, it may choose to rely on it to justify adopting the same TSTF. In practice, the SE accompanying the license amendment for the first plant to adopt a particular TSTF establishes a baseline safety basis for the TSTF. Beginning in 2002, the staff revised its TSTF review and approval process to require preparation of a formal staff SE to support the approval of each new acceptable TSTF proposal. Providing a model SE with the NRC's approval of a TSTF streamlines the license amendment process for plants adopting the TSTF, by establishing a generally applicable and acceptable baseline safety basis that licensees can use to justify adoption of the TSTF, consistent with any pertinent plant-specific considerations.

This SE addresses the adoption of TSTF Nos. 273, 279, 299, 308, 348, 363, and 364, which were approved by the staff prior to 2002. However, other facilities have previously adopted TSTF Nos. 273, 279, 299, 363, and 364; thus previous SEs (as noted in Section 3.0) have already established the baseline safety bases for these TSTFs. The present application contains the initial licensee proposals for adopting TSTF Nos. 308, and 348; thus this SE establishes the baseline safety bases for these TSTFs.

3.0 TECHNICAL EVALUATION

3.1 Adoption of TSTF-273, Revision 2

The licensee proposed to revise TS 5.5.12, "Safety Function Determination Program (SFDP)," and the Bases for Limiting Condition for Operation (LCO) 3.0.6 to clarify the intent of LCO 3.0.6 in the event a single inoperable TS support system makes both redundant subsystems of a supported system inoperable (a loss of safety function condition). This clarification is based on changes incorporated in the STSs with the approval by the NRC of TSTF-273, Revision 2, on August 16, 1999. The staff has previously approved adoption of this TSTF at Palo Verde on October 15, 2001.

The STSs were developed such that the LCO Actions for a single support system inoperability would be addressed by that support system's Actions, without cascading to the supported system's LCO Actions. LCO 3.0.6 establishes this exception to LCO 3.0.2 for support systems that have an LCO specified in the TSs. However, LCO 3.0.6 also requires an evaluation under the SFDP to ensure that a loss of function does not exist.

STS LCO 3.0.2 states,

Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6.

STS LCO 3.0.6 states,

When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, an evaluation shall be performed in accordance with Specification 5.5.12, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

The last sentence of this specification could be interpreted to require taking the applicable Actions of the supported system's LCO in the event a loss of the supported system safety function is caused by just a single inoperable support system. This potential misinterpretation exists for both non-redundant as well as redundant support systems, whenever a complete loss of the support function exists.

Facilities, such as SSES, that have adopted an SFDP specification in the TS administrative controls section, have experienced the noted misinterpretation of SFDP requirements. In response, industry proposed to clarify the SFDP requirements with TSTF-273 as amended by a Westinghouse Owners Group (WOG) initiated change, WOG-ED-23. Specifically, TSTF-273 added the following sentence (insert 2 of TSTF-273) at the end of the last paragraph of STS 5.5.12.

When a loss of safety function is caused by the inoperability of a single Technical Specification support system, the appropriate Conditions and Required Actions to enter are those of the support system.

Also added to STS 5.5.12 by TSTF-273 was the following phrase, proposed in WOG-ED-23, that was inserted into the initial sentence of the second paragraph, which follows STS 5.5.12.d. The second paragraph defines when a loss of safety function exists.

no concurrent loss of offsite power, or no current loss of onsite diesel generator(s)

As revised, this sentence states,

A loss of safety function exists when, assuming no concurrent single failure, no concurrent loss of offsite power, or no concurrent loss of onsite diesel generator(s), a safety function assumed in the accident analysis cannot be performed.

SSES proposed to revise TS 5.5.12 by incorporating the above changes without any deviation. These changes do not affect the design, operation, or maintenance of SSES, but only add clarification for determining when a loss of safety function condition exists and what LCO Actions are required to be taken when a safety function is lost. By clarifying the intent of the existing requirements of the SFDP and LCO 3.0.6, these changes remove an ambiguity that could lead to a misinterpretation of those requirements. Therefore, the changes to SSES TS 5.5.12 associated with adopting TSTF-273, Revision 2, are administrative and acceptable.

In addition, TSTF-273 further clarified the requirements of STS LCO 3.0.6 by adding two paragraphs to the end of the associated Bases.

The NRC staff reviewed the proposed administrative changes described above and finds that they appropriately incorporate TSTF-273, Revision 2, into SSES-1 and 2 TS 3.0.6 Bases and into TS 5.5.12. Therefore, SSES-1 and 2 implementation of this TSTF is acceptable.

3.2 Adoption of TSTF-279, Revision 0

The NRC staff approved TSTF-279, Revision 0, on July 16, 1998. This TSTF revised STS 5.5.7, "Inservice Testing Program [IST]," by removing reference to "applicable supports," which are already adequately governed by the inservice inspection program requirements of Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50.55a. The staff previously approved adoption of this TSTF at Grand Gulf on June 30, 2000. The licensee proposed to adopt this TSTF without deviation in corresponding SSES-1 and 2 TS 5.5.6.

The justification for this NRC-approved TSTF is that the IST program provides controls for testing American Society of Mechanical Engineers (ASME), Boiler and Pressure Vessel Code, Class 1, 2, and 3 components. Discussing applicable supports in Section 5.5.6 of the TSs is not necessary because supports and snubbers are addressed under the inservice inspection (ISI) program rather than under the IST program. Therefore, the reference to the applicable supports in the IST program description in the SSES-1 and 2 TSs can be deleted. Additionally, ASME has developed the *Code for Operation and Maintenance of Nuclear Power Plants* and other guidance to provide appropriate testing requirements for supports and snubbers.

In its amendment application, the licensee proposed to delete the reference to "applicable supports" from TS 5.5.6 because they are already addressed in the ISI program. The change proposed by the licensee is identical to the change referenced by the TSTF, and the change is applicable to the licensee's TSs. Therefore, the staff concludes that the proposed change to TS 5.5.6 to incorporate TSTF-279 into the administrative controls section of their TSs is acceptable.

3.3 Adoption of TSTF-299, Revision 0

The NRC staff approved TSTF-299, Revision 0, on October 10, 2000. This TSTF clarified the meaning of "refueling cycle" for system integrated leak test intervals in STS 5.5.2, "Primary Coolant Sources Outside Containment;" specifically STS 5.5.2.b. It also specified that the provisions of STS Surveillance Requirement (SR) 3.0.2 are applicable to these test intervals. The staff has previously approved adoption of this TSTF at Vogtle Units 1 and 2 on May 11, 2001. The licensee proposed to adopt this TSTF without deviation in corresponding SSES-1 and 2 TS 5.5.2.

SSES-1 and 2 TS Section 5.5.2 contains program requirements to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practical. This is achieved through a program that includes preventive maintenance, periodic visual inspection, and periodic leak tests on each affected system.

The proposed change affects the interval at which leak rate tests are performed. Under the proposed change, leak rate testing will be performed at least once every 24 months regardless of actual refueling cycle lengths, and if an extension of that interval becomes necessary due to scheduling consideration, the provisions of SR 3.0.2 will provide the necessary flexibility. SR 3.0.2 allows the licensee to extend the periodicity of a surveillance by 25 percent in the case that plant conditions are not suitable at the required surveillance periodicity. Additionally, by explicitly stating the interval for leak rate tests, the licensee cannot delay the tests to account for shutdowns or power reductions that occur during the cycle and may lead to longer intervals between refueling outages in order to achieve required fuel burnup.

The proposed changes allow the licensee some flexibility in determining when to perform required leak rate tests. In addition, the changes explicitly document the time periodicity requirement for the leak rate tests, ensuring greater consistency. Therefore, the staff concludes that the proposed change to TS 5.5.2 to incorporate TSTF-299 into the administrative controls section of the TSs is acceptable.

3.4 Adoption of TSTF-308, Revision 1

The NRC staff approved TSTF-308, Revision 1, on June 27, 2000. This TSTF clarified STS 5.5.4, "Radioactive Effluent Controls Program," to specify the intended Generic Letter (GL) 89-01 determination requirements for cumulative and projected dose contributions. The licensee proposed to adopt this TSTF without deviation in corresponding SSES-1 and 2 TS 5.5.4.

The NRC staff issued GL 89-01, "Implementation of Programmatic Controls for Radiological Effluent Technical Specifications (RETSs) in the Administrative Controls Section of the Technical Specifications and the Relocation of Procedural Details of RETSs to the Offsite Dose Calculation Manual or to the Process Control Program," on January 31, 1989. In this GL, the NRC staff informed licensees that programmatic controls can be implemented in the administrative controls section of the TSs to satisfy existing regulatory requirements for RETSs. At the same time, the procedural details of the current TSs on radioactive effluents and radiological environmental monitoring can be relocated to the Offsite Dose Calculation Manual (ODCM). The staff provided GL 89-01 as a line-item improvement of the TSs, consistent with the goals of the Commission's proposed policy statement on technical specification improvements for Nuclear Power Reactors (the Interim Policy Statement on TS Improvements), which was issued on February 6, 1987, (52 FR 3288). The licensee did not revise its RETSs by implementing GL 89-01 until 1998 when it adopted the ITSS, which were based on STS Revision 1.

The NRC staff encouraged licensees to propose license amendments to incorporate the model specifications in Enclosure 3 to GL 89-01 into their facilities TSs, which satisfies the requirements of 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR

Part 50. Enclosure 3 provided model specifications for programmatic controls for RETSs and its associated reporting requirements. These model specifications replaced various RETS LCOs and surveillance requirements (SRs) in the previous standard TSs with programmatic controls in new TS 6.8.4.g, "Radioactive Effluent Controls Program." In particular, TS 6.8.4.g.5 retained the radioactive effluent dose determination and projection requirements from previous standard TS Section 3/4.11, "Radioactive Effluents." These retained requirements are quoted below.

In the following quotations of TSs for radioactive effluents, the previous standard TSs are compared to the SSES-1 and 2 TSs as they existed just prior to adopting the ITSs. Both documents contained the unmarked text. In addition, the previous standard TSs also contained text, noted by brackets [], that was not contained in the SSES-1 and 2 TSs. And the SSES-1 and 2 TSs contained text, noted by parenthesis (), that was not contained in the previous standard TSs. These differences reflect the SSES licensing basis regarding liquid effluents, and do not affect the evaluation of the adoption of TSTF-308, Revision 1.

TS 3/4.11.1.2, "Liquid Effluents: Dose"

- 4.11.1.2 Cumulative dose contributions from liquid effluents for the current calendar quarter and the current calendar year shall be determined in accordance with the methodology and parameters in the ODCM at least once per 31 days.

TS 3/4.11.1.3, "Liquid Effluents: Liquid Waste Treatment System"

- 4.11.1.3.1 Doses due to liquid releases from each reactor unit to UNRESTRICTED AREAS shall be projected at least once per 31 days in accordance with the methodology and parameters in the ODCM [when Liquid Radwaste Treatment Systems are not being fully utilized].

TS 3/4.11.2.2, "Gaseous Effluents: Dose - Noble Gases"

- 4.11.2.2 Cumulative dose contributions for the current calendar quarter and current calendar year for noble gases shall be determined in accordance with the methodology and parameters in the ODCM at least once per 31 days.

TS 3/4.11.2.3, "Gaseous Effluents: Dose - Iodine-131, [Iodine-133,] Tritium, and [Radioactive Material] (Radionuclides) in Particulate Form"

- 4.11.2.3 Cumulative dose contributions for the current calendar quarter and current calendar year for Iodine-131, [Iodine-133,] tritium and radionuclides in particulate form with half-lives greater than 8 days shall be determined in accordance with the methodology and parameters in the ODCM at least once per 31 days.

TS 3/4.11.2.5, "Gaseous Effluents: Ventilation Exhaust Treatment System"

- 4.11.2.5.1 Doses due to gaseous releases from each unit to areas at and beyond the SITE BOUNDARY shall be projected at least once per 31 days in accordance with the methodology and parameters in the ODCM [when the Ventilation Exhaust Treatment System is not being fully utilized].

The GL combined these surveillances as a programmatic requirement in previous standard TS 6.8.4.g, "Radioactive Effluent Controls Program," item 5:

Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days.

The improved STS, through Revision 1, retained the Radioactive Effluent Controls Program requirements of TS 6.8.4.g in STS 5.5.4; in particular, the text of TS 6.8.4.g.5 was retained verbatim in STS 5.5.4.e, until NRC approval of TSTF-308, Revision 1. When SSES-1 and 2 adopted Revision 1 of the STS in 1998, it adopted the above version of STS 5.5.4.e.

The Westinghouse Owners Group proposed TSTF-308 because it was concerned that the text of this specification "can be misinterpreted to require determining projected dose contribution *for the current calendar quarter and current calendar year every 31 days.*" The text of the above previous standard TS SRs, and also the previous SSES-1 and 2 TS SRs, clearly did not require determining projected dose contributions *for the current calendar quarter and current calendar year every 31 days* (See SRs 4.11.1.3.1 and 4.11.2.5.1 above). Therefore, in TSTF-308, Revision 1, industry proposed clarifying STS 5.5.4.e with the following text, which was suggested by the NRC staff:

Determination of cumulative dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days. Determination of projected dose contributions from radioactive effluents in accordance with the methodology in the ODCM at least every 31 days,

These two statements differ from the language in the previous standard TS SRs and in the STS Revision 1 version of Specification 5.5.4.e by omitting the phrase "and parameters" after the word methodology in the second sentence. This difference is acceptable because it does not change the actual implementation of the projected dose determination, which is addressed in the ODCM. However, including this phrase would also be acceptable for the same reason.

The licensee proposed to revise TS 5.5.4.e by replacing the existing wording with the above language from TSTF-308, Revision 1. This change to SSES-1 and 2 TS 5.5.4.e is administrative because it only clarifies the intent of the dose projection requirement by removing a potential for misinterpretation, which was unintentionally introduced when SSES-1 and 2 adopted improved STS 5.5.4.e, which was based on GL 89-01. Therefore, the adoption of TSTF-308, Revision 1, by the licensee is acceptable.

Any plant that has adopted TS 6.8.4.g.5, in accordance with GL 89-01, or STS 5.5.4.e (Revision 1 or earlier), should revise its TSs in accordance with TSTF-308, Revision 1, which has been incorporated into STS Revision 2. Any plant electing to implement GL 89-01 should adopt the STS Revision 2 version of Specification 5.5.4.e.

In addition to the above administrative change, the licensee proposed an editorial change to render the terms "unrestricted area" (in TS 5.5.4.b) and "site boundary" (in TS 5.5.4.g) in lower-case type, instead of upper-case type. Although these terms are used in TS 5.5.4, capitalizing them is not appropriate because they are no longer specified as TS definitions in SSES-1 and 2 TS Section 1.1. These terms, however, are adequately defined and maintained in the SSES-1 and 2 Updated Final Safety Analysis Report (UFSAR) in accordance with 10 CFR 50.59. Therefore, this editorial change is acceptable.

3.5 Adoption of TSTF-348, Revision 0

The NRC staff approved TSTF-348, Revision 0, on January 7, 2000. This TSTF revised STS 5.6.2, "Annual Radiological Environmental Operating Report," to delete reference to collocated dosimeters to reflect cancellation of the NRC environmental monitoring program with States. The licensee proposed to adopt this TSTF without deviation in corresponding SSES-1 and 2 TS 5.6.2.

In Press Release No. 98-08, dated January 13, 1998, the NRC announced that it had ended its contract with 34 States to perform radiation monitoring around certain facilities as of the end of 1997. In Revision 1 of the STS, the last paragraph of Specification 5.6.2, "Annual Radiological Environmental Operating Report," contained the following reporting requirement statement. (Note that TLD stands for thermo-luminescent dosimeter.)

[The report shall identify the TLD results that represent collocated dosimeters in relation to the NRC TLD program and the exposure period associated with each result.]

This statement was bracketed to indicate that it did not apply to facilities that did not participate in this program; i.e., plants that did not have collocated dosimeters. The NRC TLD program referred to by this statement, however, was the same program that the NRC had canceled at the end of 1997. In 1999, the industry proposed TSTF-348 to delete this reporting requirement because without a program there would be no program results to report. The NRC staff finds this change acceptable because without a TLD program with the states, requiring a report documenting the results of such a program is meaningless.

The licensee proposed to remove the reporting requirement for collocated TLDs from section 5.6.2. of their TSs in accordance with the guidance of TSTF-348. Deleting this reporting requirement is considered an administrative change because there is no longer a TLD program with results to report. Therefore, this change is acceptable.

3.6 Adoption of TSTF-363, Revision 0

The NRC staff approved TSTF-363, Revision 0, on March 21, 2000. This TSTF revised ITS 5.6.5, "Core Operating Limits Report (COLR)," to allow licensees to provide only the title and

number of Topical Reports, as long as the complete citation, including date, revision, and supplement number information, is properly maintained and updated in the COLR. This method of referencing topical reports allows licensees to use current topical reports to support limits in the COLR without having to submit an amendment to the facility operating license every time the topical report is revised. The NRC staff had previously approved adoption of this TSTF at Millstone Unit 2 on December 19, 2001.

The licensee proposed to incorporate TSTF-363 into their TSs by adding the following sentence to TS 5.6.5.b, "Those methods are described in the following documents, the approved versions of which are as specified in the COLR," and by removing any references to dates, revision numbers, and supplements. In addition, the licensee proposed to delete four documents from Section 5.6.5.b of the Unit 1 TSs and five documents from Section 5.6.5.b of the Unit 2 TSs based on the fact that they were not applicable for the current core fuel loadings. Finally, the licensee updated EMF-85-74(P)(A), "RODEX 2A (BWR) Fuel Rod Thermal-Mechanical Evaluation Model," on the list of references in TS 5.6.5.b to note that it is an approved reference.

The NRC staff reviewed the justification for the proposed revision, the applicability of each proposed topical report to be included in TS 5.6.5.b, and the licensee's response to a request for additional information in which two of the approved GE topical reports were removed from the list since SSES-1 and 2 currently contain no GE fuel. The NRC staff agrees with the licensee's incorporation of the TSTF-363 methodology for referencing topical reports in the TSs and COLR, provided that the licensee ensures that TS 5.6.5.b, as well as the full citations in the COLR, are updated in a timely manner so that they contain only those reports and methodologies that are applicable to the current core loading.

Based on its review of the administrative changes described above, the NRC staff finds the licensee's incorporation of TSTF-363, Revision 0, into their TSs to be acceptable.

3.7 Adoption of TSTF-364, Revision 0

The NRC staff approved TSTF-364, Revision 0, on June 1, 2000. This TSTF revised STS 5.5.11, "Technical Specifications Bases Control Program," to reflect changes to 10 CFR 50.59. The changes in TSTF-364 revise SSES-1 and 2 TS 5.5.10.b.2 to remove the reference to "an unreviewed safety question," and to incorporate editorial change WOG-ED-24 into TS 5.5.10.b for consistency in usage. The NRC staff had previously approved adoption of this TSTF at many facilities, and most recently at Brunswick Units 1 and 2 on December 19, 2001. The licensee proposed to adopt this TSTF without deviation in corresponding SSES-1 and 2 TS 5.5.10.

The Commission's October 4, 1999, revision of 10 CFR 50.59 necessitated this NRC-approved TSTF. Section 50.59 establishes the conditions under which licensees may make changes to the facility or procedures and conduct tests or experiments without prior NRC approval. The 1999 revision of this rule resolved differences in its interpretation by the industry and NRC. In the revision, the definition of "unreviewed safety question" was eliminated from Section 50.59. Therefore, TSTF-364 allows licensees to change the wording of TS 5.5.10.b.2 to simply reference changes to TS Bases and the Final Safety Analysis Report "pursuant to 10 CFR 50.59," and delete reference to "unreviewed safety question." Additionally, editorial

change WOG-ED-24 substitutes "require" for "involve" in TS 5.5.10.b for consistency of usage. The NRC staff's review finds that the changes proposed by the licensee are identical to the changes referenced by TSTF-364, Revision 0, and the changes are applicable to the licensee's TSs. Therefore, the staff concludes that the proposed changes to TS 5.5.10.b authorized by TSTF-364 are acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Pennsylvania State official was notified of the proposed issuance of the amendments. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments relate to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

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