Bryce L. Shriver
Senior Vice President and
Chief Nuclear Officer

PPL Susquehanna, LLC
769 Salem Boulevard
Berwick, PA 18603
Tel. 570 542.3120 Fax 570 542.1504
blshriver@pplweb com

MAR 0 3 2003

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

**SUSQUEHANNA STEAM ELECTRIC STATION
PROPOSED AMENDMENT NO. 252 TO LICENSE
NPF-14 AND PROPOSED AMENDMENT NO. 217 TO
LICENSE NPF-22: APPLICATION FOR TECHNICAL
SPECIFICATION IMPROVEMENT TO ELIMINATE
REQUIREMENTS FOR POST ACCIDENT SAMPLING
STATIONS FOR BOILING WATER REACTORS USING THE
CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS**
PLA-5603

**Docket Nos. 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 delete Technical Specification (TS) 5.5.3, "Post Accident Sampling," and thereby eliminate the requirements to have and maintain the post accident sampling stations at Susquehanna. The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-413, "Elimination of Requirements for a Post Accident Sampling System (PASS)." The availability of this technical specification improvement was announced in the Federal Register on March 20, 2002 as part of the consolidated line item improvement process (CLIIP). As discussed in the model safety evaluation (SE) for this TS improvement, this request also revises TS 5.5.2, "Primary Coolant Sources Outside Containment," to reflect the elimination of PASS.

These proposed changes have been reviewed by the Plant Operations Review Committee and approved by the Susquehanna Safety Review Committee.

A001

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.

We request approval of the proposed License Amendment by June 30, 2003, with the amendment being implemented within 60 days following approval. The NRC recently approved similar submittals for Columbia, Hatch, Nine Mile Point 2, Fermi 2, and Perry Nuclear Generating Plants.

In accordance with 10 CFR 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. Duane L. Filchner at (610) 774-7819.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 03/03/03

B. L. Shriver

Attachments:

Attachment 1 - Description, Applicability, and Verification of the Proposed Change
Attachment 2 - Proposed Technical Specification Changes Units 1 & 2, (Mark-ups)
Attachment 3 - Proposed Technical Specification Pages Units 1 & 2, (Camera Ready)
Attachment 4 - List of Regulatory Commitments

cc: NRC Region I
Mr. S. L. Hansell, NRC Sr. Resident Inspector
Mr. R. V. Guzman, NRC Project Manager
Mr. R. Janati, DEP/BRP

Attachment 1 to PLA-5603

Description, Applicability, and Verification of the Proposed Change

Attachment 1 - Description, Applicability, and Verification of the Proposed Change

1.0 DESCRIPTION

In accordance with the provisions of 10 CFR 50.90, PPL Susquehanna, LLC (PPL) proposes to revise the Susquehanna Steam Electric Station Units 1 and 2 (SSES) Technical Specifications (TS). The proposed license amendment deletes the program requirements of TS 5.5.3, "Post Accident Sampling" and thereby eliminate the requirements to have and maintain the PASS at Susquehanna. The proposed license amendment also revises TS 5.5.2 "Primary Coolant Sources Outside Containment," to reflect the possible future elimination of the Post Accident Sampling Stations (PASS).

BWR Owners' Group topical report NEDO-32991, "Regulatory Relaxation for BWR Post Accident Sampling Stations (PASS)," evaluated the PASS requirements to determine their contribution to plant safety and accident recovery. The topical report considered the progression and consequences of core damage accidents and assessed the accident progression with respect to plant abnormal and emergency operating procedures, severe accident management guidance, and emergency plans. NEDO-32991 concluded that many of the current PASS samples specified in NUREG-0737, "Clarification of TMI Action Plan Requirements," may be eliminated.

The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-413, "Elimination of Requirements for a Post Accident Sampling System (PASS)." The availability of this TS improvement was announced in the *Federal Register* on March 20, 2002 (FR Vol. 67, No. 54, pg. 13027) as part of the Consolidated Line Item Improvement Process (CLIIP).

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

PPL has reviewed the model safety evaluation published in the *Federal Register* on December 27, 2001 (FR Vol. 66, No. 248, pg. 66949) as part of the CLIIP. This verification included a review of the NRC staff's evaluation (as modified slightly by the notice of availability dated March 20, 2002) as well as the information provided to support TSTF - 413 (i.e., NEDO-32991, Rev. 0, submitted November 30, 2000 and the associated NRC safety evaluation dated June 12, 2001). PPL has concluded that the

justifications presented in the TSTF proposal and the model safety evaluation prepared by the NRC staff are applicable to SSES 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-413 or the NRC staff's model safety evaluation published in the *Federal Register* on December 27, 2001. However, PPL is not revising the TS Bases because the changes described in TSTF-413 do not apply to Susquehanna.

The SSES TS include an administrative requirement for a program to minimize the leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident. PASS is specifically listed in TS 5.5.2 as falling under the scope of this requirement. As described in the staff's model safety evaluation published in the *Federal Register* on December 27, 2001, PPL might implement a modification such that PASS would not be a potential leakage path outside containment. This modification may not, however, be made during the implementation period for this amendment. As such, TS 5.5.2 is revised to add the phrase, "(until such time as a modification eliminates the PASS penetration as a potential leakage path)." The above phrase makes clear that TS 5.5.2 remains applicable to the PASS as long as it is a possible leakage path and reflects that the actual modification of the piping system may be scheduled beyond the implementation period for this amendment.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Determination

PPL has evaluated the proposed no significant hazards consideration determination published in the *Federal Register* on December 27, 2001 (FR Vol. 66, No. 248, pg. 66949) as part of the CLIIP. PPL has concluded that the proposed determination presented in the notice is applicable to SSES and the determination is incorporated herein 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:

1. PPL has developed contingency plans for obtaining and analyzing highly radioactive reactor coolant, suppression pool, and containment atmospheric samples. The contingency plans are contained in plant procedures and implementation is complete. Establishment and maintenance of contingency plans is considered a regulatory commitment.

2. The capability for classifying fuel damage events at the Alert level threshold has been established for Susquehanna at radioactivity levels of 300 μCi/gm dose equivalent iodine. This capability is described in the emergency plan implementing procedures and implementation is complete. The capability for classifying fuel damage events is considered a regulatory commitment.

3. PPL has implemented an I-131 site survey detection capability that provides an alternate means for dose projections. This capability is described in emergency plan implementing procedures. Implementation of this commitment is complete. The capability to monitor radioactive iodine is considered a regulatory commitment.

4.0 ENVIRONMENTAL EVALUATION

PPL has reviewed the environmental evaluation included in the model safety evaluation published in the *Federal Register* on December 27, 2001 (FR Vol. 66, No. 248, pg. 66949) 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 incorporated herein by reference for this application.

Attachment 2 to PLA-5603

Proposed Technical Specification Changes

Units 1 & 2

(Mark-ups)

5.5 Programs and Manuals

5.5.1 (ODCM) (continued)

shall indicate the date (i.e., month and year) the change was implemented.

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls 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 practicable. The systems include Core Spray, High Pressure Coolant Injection, Residual Heat Removal, Reactor Core Isolation Cooling, Reactor Water Cleanup, Standby Gas Treatment, Scram Discharge, Post Accident Sampling and Containment Air Monitoring Systems. The program shall include the following:

(Until such time as a modification eliminates the PASS penetration as a potential leakage path)

a. Preventive maintenance and periodic visual inspection requirements; and

b. Integrated leak test requirements for each system at least once per 24 months.

The provisions of SR 3.0.2 are applicable.

5.5.3 Post Accident Sampling

Not Used

This program provides controls that ensure the capability to obtain and analyze reactor coolant, radioactive gases and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

a. Training of personnel;

b. Procedures for sampling and analysis; and

c. Provisions for maintenance of sampling and analysis equipment.

5.5.4 Radioactive Effluent Controls Program

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably

(continued)

5.5 Programs and Manuals

5.5.1 ODCM (continued)

shall indicate the date (i.e., month and year) the change was implemented.

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls 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 practicable. The systems include Core Spray, High Pressure Coolant Injection, Residual Heat Removal, Reactor Core Isolation Cooling, Reactor Water Cleanup, Standby Gas Treatment, Scram Discharge, Post Accident Sampling and Containment Air Monitoring Systems. The program shall include the following:

(Until such time as a modification eliminates the PASS penetration as a potential leakage path)

a. Preventive maintenance and periodic visual inspection requirements; and

b. Integrated leak test requirements for each system at least once per 24 months.

The provisions of SR 3.0.2 are applicable.

5.5.3 Post Accident Sampling

Not Used

This program provides controls that ensure the capability to obtain and analyze reactor coolant, radioactive gases and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

a. Training of personnel;

b. Procedures for sampling and analysis; and

c. Provisions for maintenance of sampling and analysis equipment.

5.5.4 Radioactive Effluent Controls Program

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably

(continued)

Attachment 3 to PLA-5603

Proposed Technical Specification Pages

Units 1&2

("Camera Ready")

5 5 Programs and Manuals

5.5 1 (ODCM) (continued)

shall indicate the date (i e., month and year) the change was implemented

5 5.2 Primary Coolant Sources Outside Containment

This program provides controls 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 practicable The systems include Core Spray, High Pressure Coolant Injection, Residual Heat Removal, Reactor Core Isolation Cooling, Reactor Water Cleanup, Standby Gas Treatment, Scram Discharge, Post Accident Sampling (until such time as a modification eliminates the PASS penetration as a potential leakage path) and Containment Air Monitoring Systems The program shall include the following

a Preventive maintenance and periodic visual inspection requirements, and

b. Integrated leak test requirements for each system at least once per 24 months.

The provisions of SR 3 0 2 are applicable

5 5 3 Not Used

5.5 4 Radioactive Effluent Controls Program

This program conforms to 10 CFR 50 36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably

(continued)

5 5 Programs and Manuals

5 5 1 ODCM (continued)

shall indicate the date (i e., month and year) the change was implemented.

5.5 2 Primary Coolant Sources Outside Containment

This program provides controls 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 practicable The systems include Core Spray, High Pressure Coolant Injection, Residual Heat Removal, Reactor Core Isolation Cooling, Reactor Water Cleanup, Standby Gas Treatment, Scram Discharge, Post Accident Sampling (until such time as a modification eliminates the PASS penetration as a potential leakage path) and Containment Air Monitoring Systems. The program shall include the following

a Preventive maintenance and periodic visual inspection requirements; and

b Integrated leak test requirements for each system at least once per 24 months

The provisions of SR 3 0 2 are applicable.

5.5 3 Not Used

5 5 4 Radioactive Effluent Controls Program

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably

(continued)

Attachment 4 to PLA-5603

List of Regulatory Commitments

ATTACHMENT 4
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. Duane L. Filchner at (610) 774-7819.

REGULATORY COMMITMENTS	Due Date/Event
PPL has developed contingency plans for obtaining and analyzing highly radioactive reactor coolant, suppression pool, and containment atmospheric samples. The contingency plans are contained in plant procedures and implementation is complete. Establishment and maintenance of contingency plans is considered a regulatory commitment.	Complete
The capability for classifying fuel damage events at the Alert level threshold has been established for Susquehanna at radioactivity levels of 300 μCi/gm dose equivalent iodine. This capability is described in the emergency plan implementing procedures and implementation is complete. The capability for classifying fuel damage events is considered a regulatory commitment.	Complete
PPL has implemented an I-131 site survey detection capability that provides an alternate means for dose projections. This capability is described in emergency plan implementing procedures. Implementation of this commitment is complete. The capability to monitor radioactive iodine is considered a regulatory commitment.	Complete