

October 29, 2003

Mr. Bryce L. Shriver  
Senior Vice President  
and Chief Nuclear Officer  
PPL Susquehanna, LLC  
769 Salem Boulevard, NUCSB3  
Berwick, PA 18603-0467

SUBJECT: SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2 - ISSUANCE  
OF AMENDMENT RE: REVISED RESPONSE TO GENERIC LETTER 94-02  
"LONG-TERM STABILITY SOLUTION" (TAC NOS. MB9008 AND MB9009)

Dear Mr. Shriver:

The Nuclear Regulatory Commission has issued the enclosed Amendment No. 215 to Facility Operating License No. NPF-14 and Amendment No. 190 to Facility Operating License No. NPF-22 for the Susquehanna Steam Electric Station, Units 1 and 2. These amendments are in response to your application dated May 6, as supplemented by letters dated August 12, and September 18, 2003.

The amendments delete Technical Specification (TS) 3.3.1.3, "Oscillation Power Range Monitor (OPRM) Instrumentation," which has not yet been implemented, and revise TS 3.4.1, "Recirculation Loops Operating," to formally extend the currently implemented requirements, which define appropriately conservative restrictions to plant operation and operator response to thermal hydraulic instability events. In addition, the amendments revise TS 3.4.1 to refer to the power flow map in the core operating limits report and include a reference in TS 5.6.5. The requirements serves as an interim solution until plant-specific analyses is completed and the OPRM system and associated TSs are implemented.

A copy of our safety evaluation is also enclosed. The 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. 215 to  
License No. NPF-14  
2. Amendment No. 190 to  
License No. NPF-22  
3. Safety Evaluation

cc w/encls: See next page

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Docket Nos. 50-387 and 50-388

- Enclosures: 1. Amendment No. 215 to License No. NPF-14
- 2. Amendment No. 190 to License No. NPF-22
- 3. Safety Evaluation

DISTRIBUTION:

PDI-1 R/F	BPlatchek, RGN-1	OGC
ACRS	RGuzman	CSchulten
PUBLIC	M'O'Brien	GHill (4)
Rlaufer	Fakstulewicz	THuang

cc w/encls: See next page

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

\*\*See previous concurrence.

Accession No.: ML033080263

Package No.: ML

TSs: ML

OFFICE	PDI-1/PM	PDI-2/LA	SRXB*	IROB**	OGC**	PDI-1/SC
NAME	RGuzman	SLittle for MO'Brien	FAkstulewicz	TBoyce	RHoefling	RLaufer
DATE	10/29/03	10/29/03	10/20/03	10/27/03	10/29/03	10/29/03

OFFICIAL RECORD COPY

Susquehanna Steam Electric Station,  
Units 1 &2

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Units 1 &2

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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. 215  
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 May 6, as supplemented by letters dated August 12 and September 18, 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. 215 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 30 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: October 29, 2003

ATTACHMENT TO LICENSE AMENDMENT NO. 215

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

i  
3.3-15a  
3.3-15b  
3.4-1  
3.4-2  
3.4-3  
3.4-4  
3.4-5  
5.0-21  
5.0-23

INSERT

i  
-  
-  
3.4-1  
3.4-2  
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3.4-4  
3.4-5  
5.0-21  
5.0-23



PPL SUSQUEHANNA, LLC

ALLEGHENY ELECTRIC COOPERATIVE, INC.

DOCKET NO. 50-388

SUSQUEHANNA STEAM ELECTRIC STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 190  
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 PPL Susquehanna, LLC, dated May 6, as supplemented by letters dated August 12 and September 18, 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. 190 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 30 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: October 29, 2003

ATTACHMENT TO LICENSE AMENDMENT NO. 190

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

i  
3.3-15a  
3.3-15b  
3.4-1  
3.4-2  
3.4-3  
3.4-4  
3.4-5  
5.0-21  
5.0-23

INSERT

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-  
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3.4-1  
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3.4-3  
3.4-4  
3.4-5  
5.0-21  
5.0-23

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 215 TO FACILITY OPERATING LICENSE NO. NPF-14  
AND AMENDMENT NO. 190 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 May 6, 2003, as supplemented by letters dated August 12 and September 18, 2003, PPL Susquehanna, LLC (PPL, the licensee), requested changes to the Technical Specifications (TSs) for Susquehanna Steam Electric Station, Units 1 and 2 (SSES 1 and 2).

The proposed changes would delete SSES 1 and 2 TS 3.3.1.3, "Oscillation Power Range Monitor (OPRM) Instrumentation," and revise TS 3.4.1, "Recirculation Loops Operating," and TS 5.6.5, "Core Operating Limits Report [COLR]." The supplemental letters dated August 12 and September 18, 2003, provided clarifying information that did not change the scope of the amendment as described in the initial notice of the proposed action published in the *Federal Register* (68 FR 37582, June 24, 2003), or the U.S. Nuclear Regulatory Commission (NRC) staff's proposed no significant hazards consideration determination.

## 2.0 REGULATORY EVALUATION

The NRC finds that PPL in its May 6, 2003, submittal identified the applicable regulatory requirements. The regulatory requirements and guidance which the NRC staff considered in its review of the application are as follows:

1. Title 10 of the *Code of Federal Regulations* (10 CFR) establishes the fundamental regulatory requirements with respect to the reactivity control systems. Specifically, General Design Criteria 10 (GDC-10), "Reactor design," in Appendix A, "General Design Criteria for Nuclear Power Plants," to 10 CFR Part 50 states, in part, that the reactor core and associated coolant, control, and protection systems shall be designed with appropriate margin to assure that specified acceptable fuel design limits are not exceeded.
2. GDC-12, "Suppression of reactor power oscillations," requires that the reactor core and associated coolant, control, and protection systems shall be designed to assure that power oscillations which can result in conditions exceeding specified acceptable fuel design limits are not possible or can be reliably and readily detected and suppressed.

3. GDC-13, "Instrumentation and control," states, in part, that instrumentation shall be provided to monitor variables and systems over their anticipated ranges for normal operation, for anticipated operational occurrences, and for accident conditions as appropriate to assure adequate safety.
4. 10 CFR 50.36, "Technical specifications," provides the regulatory requirements for the content required in a licensee's TSs. 10 CFR 50.36 states, in part, that the TSs will include surveillance requirements to assure that the quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation (LCO) will be met.

### 3.0 TECHNICAL EVALUATION

#### 3.1 Background

The OPRM System is a microprocessor-based monitoring and protection system that is designed to detect power oscillations due to thermal hydraulic instabilities in boiling water reactors (BWRs). It provides compliance with GDC 10 and 12, thereby providing protection from exceeding the fuel minimum critical power ratio (MCPR) safety limit.

In a letter dated July 30, 1999, (Reference 1) the NRC staff approved changes to the SSES 1 and 2 TSs that incorporated TS 3.3.1.3, "OPRM Instrumentation," and revised TS 3.4.1, "Recirculation Loops Operating," to address thermal hydraulic instabilities in BWRs. Extension of the implementation date was needed to provide time to address continuing hardware and software deficiencies with the OPRM system. The extension of the implementation date until November 1, 2001, was approved by the NRC staff on June 2, 2000 (Reference 2). A second extension of the implementation date until November 1, 2003, was approved by the NRC staff on October 29, 2001 (Reference 3). This deferral was based on a 10 CFR Part 21 report issued by General Electric (GE) Company on August 31, 2001, which identified a non-conservative deficiency in the OPRM trip setpoint methodology. PPL stated that the OPRM system could not be declared OPERABLE until a revised NRC-approved methodology and a valid basis for the trip setpoints was available and adopted for the SSES 1 and 2 OPRM system.

To date, the design issues have not been resolved by GE. As such, implementation of the approved OPRM TS on November 1, 2003 would result in immediately declaring the OPRM system inoperable, placing both SSES units in a 120-day action prior to requiring plant shutdown. The proposed amendment would supercede the implementation requirements associated with Reference 1,2, and 3, which are not yet implemented, and would effectively result in no change to the current SSES 1 and 2 operation.

#### 3.2 TS 3.3.1.3 Oscillation Power Range Monitor Instrumentation

In its May 6, 2003, submittal (Reference 4) PPL proposes to temporarily delete TS 3.3.1.3 because the deficiencies as described in the 10 CFR Part 21 GE report have not been resolved; and implementation of the approved OPRM TS on November 1, 2003, would result in immediately declaring the OPRM system inoperable. This would place both SSES 1 and 2 in a 120-day action prior to requiring plant shutdown.

Specifically, PPL states that approval of this proposed change is appropriate based on:

1. The stated NRC position to resolve the issue generically prior to imposing implementation;
2. The acceptability of continuing operation with the interim corrective actions (ICAs); and
3. The nature of an extended resolution plan for the unresolved setpoint issue.

Following the above request for a TS amendment (Reference 4) and response to the staff's request for additional information (Reference 5), PPL committed to request a TS Amendment by December 30, 2003, incorporating the OPRM system in SSES 1 and 2 TSs, and to implement the amendment by September 30, 2004 (Reference 6). The amendment request will not include the specification of the Period Based Algorithm (Sp) Allowable Value and will specify that the OPRM instrumentation will be within limits specified in the COLR. PPL will convert DIVOM [Delta critical power ratio [CPR] to initial CPR vs. oscillation magnitude] curves to OPRM system setpoints. Therefore, the proposed TSs will be changed to setpoints rather than regions when the TS amendment is requested.

In addition, PPL states:

The OPRM hardware and software is running well and as designed. PPL will continue to monitor its performance. The system is ready to be armed when a valid setpoint is developed and supporting administrative activities (e.g. procedure changes, operator training) are completed.

During the period while a generic long-term solution (LTS) was being sought, PPL has been operating under a set of Interim Corrective Actions (ICAs) designed to protect the specified acceptable fuel design limits (SAFDLs). During the interim period between the deletion of the current TS and the implementation of the new TS in 2004, PPL will continue to implement these ICAs consisting of established operator actions and administrative controls designed to protect against and mitigate the effects of potential core wide instability events.

The NRC staff has reviewed PPL's request and has concluded that the proposed change to delete TS 3.3.1.3, which requires four channels of the OPRM instrumentation to be OPERABLE when thermal power  $\geq$  25% rated thermal power (RTP), is acceptable as an interim solution until the plant-specific analyses can be completed and implemented because of the following reasons:

1. The ICAs are intended as a backup when the stability LTS is not armed. The commitment in Reference 3 to request TS to implement the LTS provides assurance that the plant will not operate indefinitely on actions designed to only provide interim protection. Further, the implementation of plant-specific TSs meets the staff guidance contained in Generic Letter (GL) 94-02.
2. The ICAs rely on the operator actions to provide sufficient protection in the interim period against violating SAFDL. Instabilities may develop quite rapidly (a few seconds,

not minutes); however, the ICAs should provide sufficient time for operators to respond rapidly to assure an SAFDL is not violated.

3. The licensing basis for accepting operation under ICA rules when an implemented LTS is not operable is that probability of an instability event that will violate SAFDL before the operator has time to intervene is quite low.
4. There have been 5 instability events in the last 20 years in United States BWRs. This places the historical probability of one event in 4 years. Therefore, operating under ICAs for a short period of time (120 days) as a backup measure when the installed LTS is not operable does not pose a significant increase in risk.

### 3.3 TS 3.4.1 - Recirculation Loops Operating and TS 5.6.5 - COLR

PPL proposes a revision to TS 3.4.1: (1) to formally extend the currently implemented requirements, which define appropriately conservative restrictions to plant operation and operator response to thermal hydraulic instability events, and (2) to refer to the power flow map in the COLR. In addition, PPL proposes to add Item 6, "The Stability Related Regions of the Power Flow Map for Specification 3.4.1" to TS 5.6.5.a and to add an additional NRC approved topical report (Item 16 for Unit 1 and Item 14 for Unit 2) "EMF-CC-074 (P)(A), Volume 4, BWR Stability Analysis: Assessment of STAIF with Input from MICROBURN-B2," as a reference to TS 5.6.5.b.

The NRC staff has reviewed the proposed changes to TS 3.4.1 and TS 5.6.5 and found them acceptable because the changes involve relocating the information in TS Figure 3.4.1-1 (thermal power stability restrictions) to the COLR and including a reference TS Section 5.6.5 which describes the NRC approved methodology for performing stability calculations using the STAIF computer code. The reference in TS 5.6.5 has been previously approved by the NRC and documents a currently used model. Therefore, the changes to TS 3.4.1 and TS 5.6.5 are administrative and acceptable.

### 3.4 OPRM System Audit

The NRC staff with its consultant from Oak Ridge National Laboratory performed an on-site review of the implementation of the LTS Solution at SSES 1 and 2 on September 15, 2003. Overall implementation of the LTS Solution for SSES Units 1 and 2 is complete and is in compliance with the guidance specified in GL 94-02 with exception of TSs 3.3.1.3 not implemented and the OPRM system not armed. The findings in the audit are summarized as follows:

1. PPL has chosen to implement Stability Long Term Solution III, which is a "detect and suppress" option. Solution III is a modification to the reactor protection system (RPS), which shuts down the reactor if a power oscillation is detected. This solution was reviewed and approved by the staff.
2. PPL has chosen to implement the Asea Brown Boveri Combustion Engineering (ABB-CE) "ABB" system. The "ABB" hardware system was reviewed and approved by the staff. In the specific case of the SSES 1 and 2 protection system, the OPRM Solution III is implemented as a hardware card that is part of the existing RPS.

3. Framatome performs most stability-related calculations for SSES 1 and 2, which has a full load of ATRIUM-10 fuel.
4. The OPRM hardware installation was completed and has been tested since 1999.
5. The OPRM data is fully integrated with the plant computer (PICSY) and available for analysis at the engineering offices.
6. PPL is still operating under the BWROG ICAs. PPL uses plant-specific regions for their ICAs, which are calculated by Framatome using their licensed STAIF (computer code) methodology. The scram region is set to a calculated decay ratio (DR) of 1.0 for the Immediate Scram Region. For the Immediate Exit Region, the scram region is set to a DRs of 0.8 for out-of-phase and 0.85 for core-wide.
7. PPL plans to arm the OPRM hardware by September 2004. The primary reason for the delay is the need to develop and validate the new Framatome analysis platform for the plant-specific DIVOM correction. Framatome is expected to use RAMONA-5 to calculate the delta-CPR induced by unstable oscillations.
8. The SSES 1 and 2 OPRM system disables all alarms and trip function below 30% power or above 60 Mlb/hr. Therefore, OPRM alarms will only occur during low-flow maneuvers (less than 60 Mlb/hr), and the number of false positives is expected to be small. PPL has several years worth of data and only expects alarms following rapid flow reductions or increases.
9. SSES 1 and 2 has four spare OPRM cards in storage. These spare cards have an estimated 40-year lifetime.

Based on the results of the audit, the NRC staff concludes that the implementation plan for the OPRM system at SSES 1 and 2 is on schedule and adequate to satisfy the requirements of an LTS when the OPRM system is armed. Overall, the testing program of the OPRM implementation at SSES 1 and 2 is effective.

### 3.5 Summary

Based on the results of the review from Sections 3.2, 3.3, and 3.4 of this evaluation, the staff concludes that:

1. The temporary deletion of TS 3.3.1.3 is acceptable until a plant-specific TS can be submitted in December 2003, and implemented by September 2004;
2. The revision of TS 3.4.1, TS 5.6.5.a, and TS 5.6.5.b is acceptable because the changes are administrative and in the interim, ICAs are used for the reactor operation.



#### 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 change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes surveillance requirements. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (68 FR 37582). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). 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.

#### 7.0 REFERENCES

1. U.S. NRC (V. Nerses) to PPL, "Susquehanna Steam Electric Station, Units 1 and 2," (Amendments 184 and 158)," dated July 30, 1999.
2. U.S. NRC (R.G. Shaaf) to PPL, "Susquehanna Steam Electric Station, Units 1 and 2 - Issuance of Amendment Re: Change of Implementation Date for Amendment No. 184 for Unit 1 and Amendment No. 158 for Unit 2," (Amendments 187 and 161), dated June 2, 2000.
3. U.S. NRC (R.G. Shaaf) to PPL, "Susquehanna Steam Electric Station, Units 1 and 2 - Issuance of Amendment Re: Change of Implementation Date for Amendment No. 184 for Unit 1 and Amendment No. 158 for Unit 2," (Amendment 196 and 172), dated October 29, 2001.
4. B.L. Shriver to U.S. NRC, "Susquehanna Steam Electric Station Proposed Amendment No. 254 to Unit 1 License NPF-14 and No. 219 to Unit 2 License NPF-22: Revised Response to GL 94-02: Long-Term Stability Solution PLA-5620," May 6, 2003.
5. B.L. Shriver to U.S. NRC, "Susquehanna Steam Electric Station Response to Request for Additional Information and Revision to Proposed Amendment No. 254 to License NPF-14 and No. 219 to License NPF-22: Revised Response to GL 94-02: Long-Term Stability Solution PLA-5653," August 12, 2003.

6. B.L. Shriver to U.S. NRC, "Susquehanna Steam Electric Station Response to Request for Additional Information and Revision to Proposed Amendment No. 254 to License NPF-14 and No. 219 to License NFP-22: Revised Response to GL 94-02: Long-Term Stability Solution PLA-5675," September 18, 2003.

Principal Contributors: T. Huang  
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Date: October 29, 2003