

February 20, 2004

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

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION (RAI) - SUSQUEHANNA STEAM  
ELECTRIC STATION, UNITS 1 AND 2 (SSES 1 AND 2) - THIRD 10-YEAR  
INSERVICE INSPECTION INTERVAL PROGRAM PLAN RE: SNUBBER  
TESTING PROGRAM (TAC NOS. MC1185 AND MC1186)

Dear Mr. Shriver:

In reviewing your submittal of September 16, 2003, relating to Relief Request No. 3RR-03, the U.S. Nuclear Regulatory Commission staff has determined that additional information described in the enclosure to this letter is needed to complete its review. These questions were discussed with your staff during a teleconference on February 4, 2004. As agreed to by your staff, we request you respond by April 30, 2004.

If you have any questions, please contact me at 301-415-1030.

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

Enclosure: RAI

cc w/encl: See next page

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\*See previous concurrence

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DATE	2/19/04	2/19/04	2/17/04	2/19/04

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REQUEST FOR ADDITIONAL INFORMATION  
RELATING TO RELIEF REQUEST NO. 3RR-03 OF THE  
THIRD 10-YEAR INSERVICE INSPECTION INTERVAL  
PROGRAM PLAN FOR  
SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2  
DOCKET NOS. 50-387 AND 50-388

1. In Relief Request No. 3RR-03, the licensee, PPL Susquehanna, LLC (PPL), presented the American Society of Mechanical Engineers (ASME), Boiler and Pressure Vessel Code requirements (ASME Code) in the 1989 Edition, Section XI, Paragraphs IWF-5200(a) and IWF-5300(a), IWF-5200(b) and IWF-5300(b), and IWF-5200(c) and IWF-5300(c), for snubber visual examination, functional testing, and attachments, respectively. Under the "Basis for Relief" section of their September 16, 2003, submittal, PPL states that the Technical Requirements Manual (TRM) snubber program maintains the same confidence level of quality and safety as that of OMa-1988, Part 4, for the visual examination, functional testing, and the examination of snubber attachments (including lugs, bolting, pins, and clamps). However, PPL does not provide an adequate basis for this statement.
  - a. Discuss how the TRM snubber program maintains the required confidence level for the snubber surveillance activities.
  - b. For snubber attachments, identify each specific ASME Code requirement in Subsection IWF for which the relief applies, and provide the basis on which to conclude that the TRM program will be able to meet the intent of such requirements.
2. Under the "Proposed Alternate Examination" section of the submittal, PPL states, "it should be noted that snubber welded attachments will be performed in accordance with the ASME Section XI Subsections IWB, IWC, and IWD welded attachment examination requirements." This sentence is not clear.
  - a. Clarify the intent of this statement. Will the inservice inspection of snubber welded attachments be performed in accordance with ASME Code, Section XI, Subsection IWB, IWC, and IWD? Present adequate information to support your proposed alternative.
  - b. Provide a detailed explanation of how Subsection IWB, IWC, and IWD requirements are related to the acceptability of the TRM program, as an alternative examination requirement for snubber attachments.

Enclosure

3. The staff has determined that the following areas of the TRM Bases are needed to complete the review of proposed Relief Request 3RR-03.
  - a. TRM Bases page TRM/B-3.7-25 states that potentially damaging transients are determined from a review of operational data and a visual inspection of the system (Condition D), but does not specify the technical requirement surveillance (TRS) inspection requirements after the determination of a potentially damaging transient. Please provide a detailed description and basis with regard to how and when you will perform inspections of all snubbers attached to sections of systems that experience these transients. (e.g. if applicable, provide your commitment to perform these inspections in your response letter).
  - b. Provide a detailed discussion of the functional testing requirements of snubbers, including the number of representative samples of snubbers required to be tested, and the condition under which a successful testing program can be achieved.

Susquehanna Steam Electric Station, Unit Nos. 1 and 2

cc:

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