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MAY 27 2005

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

SUSQUEHANNA STEAM ELECTRIC STATION
PROPOSED AMENDMENT NO. 275 TO UNIT 1
FACILITY OPERATING LICENSE NPF-14 AND
PROPOSED AMENDMENT NO. 244 TO UNIT 2
FACILITY OPERATING LICENSE NPF-22: EXIGENT
CHANGE TO TECHNICAL SPECIFICATION 3.8.4,
SUPPLEMENT 2
PLA-5907

Docket Nos. 50-387
and 50-388

Reference: 1) PLA-5891, B. T. McKinney (PPL) to Document Control Desk (USNRC), "Proposed Amendment No. 275 to Unit 1 Facility Operating License NPF-14 and Proposed Amendment No. 244 to Unit 2 Facility Operating License NPF-22 Exigent Change to Technical Specification 3.8.4," dated April 27, 2005.

2) PLA-5895, R.A. Saccone (PPL) to Document Control Desk (USNRC), "Proposed Amendment No. 275 to Unit 1 Facility Operating License NPF-14 and Proposed Amendment No. 244 to Unit 2 Facility Operating License NPF-22 Exigent Change to Technical Specification 3.8.4," dated May 4, 2005.

In accordance with the provisions of 10 CFR 50.90, PPL Susquehanna, LLC submitted a request for amendment to the Technical Specifications for Susquehanna Unit 1 and Unit 2 (Reference 1). Reference 2 provided clarification to the Reference 1 submittal based on teleconferences held on April 28 and April 29 between PPL and NRC.

In accordance with the provisions of 10 CFR 50.91(a)(6), PPL Susquehanna, LLC requested this amendment be processed on an exigent basis.

The enclosure to this letter provides responses to NRC questions that were discussed in teleconferences between NRC and PPL on May 18 and May 19.

The No Significant Hazards Consideration provided in Reference 2 and Environmental Consideration provided in Reference 1 are not affected by the information provided herein.

A001

Any questions regarding this request should be directed to Mr. Duane L. Filchner at (610) 774-7819.

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

Executed on: 5-27-05

B. T. McKinney

Enclosure - PPL Response to NRC Questions

cc: NRC Region I
Mr. A. J. Blamey, NRC Sr. Resident Inspector
Mr. R. V. Guzman, NRC Project Manager
Mr. R. Janati, DEP/BRP

ENCLOSURE TO PLA-5907

PPL Response to NRC Questions

NRC Question 1:

How will PPL determine that the battery is capable of performing its function during the time that the electrical power subsystem has been taken out of service for performance of the special inspection and related activities?

PPL Response:

PPL will determine that the battery is capable of performing its function during the time that the electrical power subsystem has been taken out of service for performance of the special inspection and related activities as follows:

- As a prerequisite for entry into the LCO 3.8.4 Condition A.2, PPL will perform SR 3.8.6.2, (Quarterly Electrical Parameter Check) via existing plant surveillance procedures, on each 125 VDC Class 1E station battery, within the week before entering the new proposed LCO 3.8.4 Condition A.2. This test will identify the pilot cell to be tested in accordance with SR 3.8.6.1 (as required by the proposed TS change) during the LCO 3.8.4 Condition A.2 completion time and will also assure that all battery cells are in an acceptable condition prior to LCO entry.

- PPL will monitor the non-Class 1E portable battery charger output voltage and output current while the portable battery charger is connected to the battery. The requirements for monitoring the portable charger will be contained in the work documentation. This will provide confidence that portable battery charger is performing as would the Class 1E charger.

- The existing 125 Class 1E bus undervoltage alarm that annunciates in the control room upon Class 1E 125 VDC System Low Voltage provides notification to plant operators of a low voltage condition and thus an indication that the portable charger output is not as expected. The Class 1E 125 VDC undervoltage relays will be calibrated in accordance with existing work documents prior to commencing the inspections of the 125 VDC Class 1E battery chargers.

- PPL will establish, in a plant procedure, the requirement for Operations and Maintenance to assess the condition and expedite restoration of the Class 1E charger undergoing inspection should a plant transient occur during work on the charger. This direction is contained in the plant procedure, which will be used to govern the work delineated in the work documentation.

- PPL has established a maximum pilot cell voltage degradation threshold value of 0.05 volts for taking actions to restore the affected Class 1E charger. This value is defined as the difference between the pilot cell voltage reading taken shortly after connection of the portable charger and the subsequent readings taken in accordance with the requirements of the work documentation and the proposed required action to perform SR 3.8.6.1. If the threshold value is exceeded and physical work has not started, the Class 1E charger will be returned to service. If the threshold value is exceeded after physical work has commenced on the Class 1E charger, the restoration work of the Class 1E charger will be completed safely and expeditiously.

- The 0.05 pilot cell voltage degradation threshold is judged to be a conservative value that provides an early warning of possible degradation of the battery. This threshold was selected to assure actions are taken to begin restoration of the Class 1E charger before the battery parameters would reach the Category A limits of LCO 3.8.6 and thus long before they could reach the inoperable parameter limits specified by the LCO 3.8.6 Category C limits. The baseline pilot cell voltage reading taken shortly after connection of the portable charger assures any charger connection differences, not indicative of battery degradation, do not unnecessarily preclude completion of the specific inspection and related activities.

- Detailed prejob briefs, with readiness reviews, will be performed prior to the work to assure all plant personnel directly involved in the special inspection and related activities are cognizant of the work plans and risk management provisions to be implemented. A post job debrief to evaluate performance and lessons learned will be performed following completion of work on the first battery charger.

NRC Question 2:

What is the capability of the portable battery charger following a postulated loss of offsite power event (LOOP)?

PPL Response:

In the event of a LOOP or loss of power to the portable charger, the portable charger would cease to operate. This would be detected in various ways including a 125 VDC System Low Voltage alarm in the control room and loss of the monitored charger output voltage and output current. PPL's response as directed in the governing procedure is for Operations and Maintenance to assess the condition and expedite restoration of the affected Class 1E charger.