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OCT 05 2005

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

**SUSQUEHANNA STEAM ELECTRIC STATION
PROPOSED AMENDMENT NO. 274 TO LICENSE NPF-14 AND
PROPOSED AMENDMENT NO. 243 TO LICENSE NPF-22:
APPLICATION FOR TECHNICAL SPECIFICATION
IMPROVEMENT TO REVISE TECHNICAL SPECIFICATIONS
TO ELIMINATE REQUIREMENTS FOR MONTHLY
OPERATING REPORTS AND OCCUPATIONAL RADIATION
EXPOSURE REPORTS USING THE CONSOLIDATED LINE
ITEM IMPROVEMENT PROCESS
PLA-5888**

**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 (TS) for Susquehanna Units 1 and 2.

The proposed amendment would delete the TS requirements to submit monthly operating reports and occupational radiation exposure reports. The change is consistent with NRC-approved Revision 1 to Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report." The availability of this TS improvement was announced in the *Federal Register* on June 23, 2004 (69 FR 35067) as part of the Consolidated Line Item Improvement Process (CLIIP).

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

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 changes. Attachment 3 provides the list of regulatory commitments.

A001

PPL Susquehanna, LLC requests approval of the proposed License Amendment by December 30, 2005, with the amendment and regulatory commitments being implemented within 60 days following approval.

In accordance with 10 CFR 50.91(b), PPL Susquehanna, LLC is providing the Commonwealth of Pennsylvania with a copy of this proposed License Amendment request.

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: 10-5-05



B. T. McKinney

Attachments:

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

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

Attachment 1 to PLA-5888

**Description, Applicability, and Verification of the
Proposed Changes**

DESCRIPTION AND ASSESSMENT

1.0 DESCRIPTION

The proposed License amendment deletes the requirements in Technical Specification (TS) 5.6.1 for an annual report on occupational radiation exposures and TS 5.6.4 for a monthly report of operating statistics and shutdown experience.

The changes are consistent with NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report," Revision 1. The availability of this Technical Specification Improvement was announced in the *Federal Register* on June 23, 2004 (69 FR 35067), as part of the Consolidated Line Item Improvement Process (CLIIP).

2.0 DESCRIPTION OF PROPOSED AMENDMENT

Consistent with the NRC-approved Revision 1 of TSTF-369, the proposed TS changes include:

- Delete TS 5.6.1, Occupational Radiation Exposure Report
- Delete TS 5.6.4, Monthly Operating Reports

As addressed in the Safety Evaluation published in the Notice of Availability for TSTF-369, PPL Susquehanna, LLC is proposing to adopt a part of NRC-approved Revision 4 to TSTF-258, "Changes to Section 5.0, Administrative Controls." Specifically, TS 5.6.4 includes a requirement to include in the monthly operating reports any challenges to safety/relief valves. The NRC model safety evaluation addressed the removal of requirements to submit monthly operating reports in those cases where the TS includes a requirement to address challenges to relief and safety valves (i.e., as in the case where Susquehanna Units 1 and 2 had not yet adopted the associated part of TSTF-258). The proposed change is consistent with the option described in the Notice of Availability published on June 23, 2004 (69 FR 35067) and the related documentation for both TSTF-369 and the limited portion of TSTF-258 included in this application.

The deletion of these reporting requirements does not result in renumbering of the TS sections. The associated Specifications are shown as "Not Used" such that the following Specification numbering and associated page numbering of subsequent pages were unaffected by this proposed amendment.

3.0 BACKGROUND

The background for this application is adequately addressed by the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369.

4.0 REGULATORY REQUIREMENTS AND GUIDANCE

The applicable Regulatory Requirements and Guidance associated with this application are adequately addressed by the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369.

5.0 TECHNICAL ANALYSIS

PPL Susquehanna, LLC has reviewed the Safety Evaluation (SE) published on June 23, 2004 (69 FR 35067) as part of the CLIIP Notice of Availability. This verification included a review of the NRC staff's SE, as well as the supporting information provided to support TSTF-369. PPL Susquehanna, LLC has concluded that the justifications presented in the TSTF proposal and the SE prepared by the NRC staff are applicable to Susquehanna Steam Electric Station, Unit 1 and Unit 2, and justify this amendment for the incorporation of the changes to the Susquehanna Steam Electric Station, Unit 1 and Unit 2 TS.

6.0 REGULATORY ANALYSIS

A description of this proposed change and its relationship to applicable regulatory requirements and guidance was provided in the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369.

6.1 Verifications And Commitments

As discussed in the model SE published in the *Federal Register* on June 23, 2004 (69 FR 35067) for this TS improvement, PPL Susquehanna, LLC is making the following regulatory commitments:

PPL Susquehanna, LLC is making a regulatory commitment to provide to the NRC using an industry database, the operating data (for each calendar month) that is described in Generic Letter 97-02 "Revised Contents of the Monthly Operating Report," by the last day of the month following the end of each calendar quarter. The regulatory commitment will be based on use of an industry database (e.g., the industry's Consolidated Data Entry (CDE) program, developed and maintained by the Institute of Nuclear Power Operations). This regulatory commitment will be implemented to prevent any gaps in the monthly operating statistics and shutdown experience provided to the NRC (i.e., data for

all months will be provided using one or both systems (monthly operating reports and CDE).

A regulatory commitment for Susquehanna Steam Electric Station, Unit 1 and Unit 2, to provide information to the NRC annually to support the apportionment of station doses to each type of reactor or to differentiate between operating and shutdown units, is not required since they are not of differing reactor types (i.e., both are BWR-type reactors) and neither unit has ceased operation.

7.0 NO SIGNIFICANT HAZARDS DETERMINATION

PPL Susquehanna, LLC has reviewed the proposed "No Significant Hazards Determination" published on June 23, 2004 (69 FR 35067) as part of the CLIIP. PPL Susquehanna, LLC has concluded that the proposed determination presented in the notice is applicable to Susquehanna Steam Electric Station Unit 1 and Unit 2 and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

8.0 ENVIRONMENTAL EVALUATION

PPL Susquehanna, LLC has reviewed the environmental evaluation included in the model Safety Evaluation published on June 23, 2004 (69 FR 35067) as part of the CLIIP. PPL Susquehanna, LLC has concluded that the NRC staff's findings presented in that evaluation are applicable to Susquehanna Steam Electric Station, and the evaluation is hereby incorporated by reference for this application.

9.0 PRECEDENT

This application is being made in accordance with the CLIIP. PPL Susquehanna, LLC is not proposing variations or deviations from the TS changes described in TSTF-369 or the NRC staff's model SE published on June 23, 2004 (69 FR 35067).

10.0 REFERENCES

Federal Register Notice: Notice of Availability of Model Application Concerning Technical Specifications Improvement To Eliminate Requirements to Provide Monthly Operating Reports and Occupational Radiation Exposure Reports Using the Consolidated Line Item Improvement Process, published June 23, 2004 (69 FR 35067).

Attachment 2 to PLA-5888
Proposed Technical Specification Changes
Units 1 & 2
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5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1

~~Occupational Radiation Exposure Report~~

Not Used

-----NOTE-----

A single submittal may be made for both SSES units. The submittal should combine sections common to all units at the station.

A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors) for whom monitoring was performed, receiving an annual deep dose equivalent > 100 mrem and the associated collective deep dose equivalent (reported in person-rem) according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket ionization chamber, thermoluminescence dosimeter (TLD), electronic dosimeter, or film badge measurements. Small exposures totaling < 20 percent of the individual total dose need not be accounted for. In the aggregate, at least 80 percent of the total deep dose equivalent received from external sources should be assigned to specific major work functions. The report covering the previous calendar year shall be submitted by April 30 of each year.

5.6.2

Annual Radiological Environmental Operating Report

-----NOTE-----

A single submittal may be made for both SSES units. The submittal should combine sections common to all units at the station.

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual

(continued)

5.6 Reporting Requirements (continued)

5.6.4

~~Monthly Operating Reports~~

Not Used

~~Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the main steam safety/relief valves, shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.~~

5.6.5

CORE OPERATING LIMITS REPORT (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:
1. The Average Planar Linear Heat Generation Rate for Specification 3.2.1;
 2. The Minimum Critical Power Ratio for Specification 3.2.2;
 3. The Linear Heat Generation Rate for Specification 3.2.3;
 4. The Average Power Range Monitor (APRM) Gain and Setpoints for Specification 3.2.4; and
 5. The Shutdown Margin for Specification 3.1.1.
 6. The OPRM setpoints for Specification 3.3.1.3.
- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC.

When an initial assumed power level of 102 percent of rated power is specified in a previously approved method, this refers to the power level associated with the design basis analyses, or 3510 MWt. The power level of 3510 MWt is 100.6% of the rated thermal power level of 3489 MWt. The RTP of 3489 MWt may only be used when feedwater flow measurement (used as input to the reactor thermal power measurement) is provided by the Leading Edge Flow Meter (LEFMTM) as described in the LEFMTM Topical Report and supplement referenced below. When feedwater flow measurements from the LEFMTM system are not available, the core thermal power level may not exceed the originally approved RTP of 3441 MWt, but the value of 3510 MWt

(continued)

5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1 Occupational Radiation Exposure Report

NOT Used

-----NOTE-----

A single submittal may be made for both SSES units. The submittal should combine sections common to all units at the station.

A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors) for whom monitoring was performed, receiving an annual deep dose equivalent > 100 mrem and the associated collective deep dose equivalent (reported in person-rem) according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket ionization chamber, thermoluminescence dosimeter (TLD), electronic dosimeter, or film badge measurements. Small exposures totalling < 20 percent of the individual total dose need not be accounted for. In the aggregate, at least 80 percent of the total deep dose equivalent received from external sources should be assigned to specific major work functions. The report covering the previous calendar year shall be submitted by April 30 of each year.

5.6.2 Annual Radiological Environmental Operating Report

-----NOTE-----

A single submittal may be made for both SSES units. The submittal should combine sections common to all units at the station.

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual

(continued)

5.6 Reporting Requirements (continued)

5.6.4 ~~Monthly Operating Reports~~

Not Used

~~Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the main steam safety/relief valves, shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.~~

5.6.5 CORE OPERATING LIMITS REPORT (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:
1. The Average Planar Linear Heat Generation Rate for Specification 3.2.1;
 2. The Minimum Critical Power Ratio for Specification 3.2.2;
 3. The Linear Heat Generation Rate for Specification 3.2.3;
 4. The Average Power Range Monitor (APRM) Gain and Setpoints for Specification 3.2.4; and
 5. The Shutdown Margin for Specification 3.1.1.
 6. The OPRM setpoints for Specification 3.3.1.3.
- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC.

When an initial assumed power level of 102 percent of rated power is specified in a previously approved method, this refers to the power level associated with the design basis analyses, or 3510 MWt. The power level of 3510 MWt is 100.6% of the rated thermal power level of 3489 MWt. The RTP of 3489 MWt may only be used when feedwater flow measurement (used as input to the reactor thermal power measurement) is provided by the Leading Edge Flow Meter (LEFM[✓]™) as described in the LEFM[✓]™ Topical Report and supplement referenced below. When feedwater flow measurements from the LEFM[✓]™ system are not available, the

(continued)

Attachment 3 to PLA-5888

List of Regulatory Commitments

LIST OF REGULATORY COMMITMENTS

The following table identifies those actions committed to by PPL Susquehanna in this document. Any other statements in this submittal are provided for informational purposes and are not considered to be regulatory commitments. Please direct questions regarding these commitments to Mr. Duane L. Filchner.

REGULATORY COMMITMENTS	Due Date/Event
1. PPL Susquehanna, LLC is making a regulatory commitment to provide to the NRC using an industry database, the operating data (for each calendar month) that is described in Generic Letter 97-02 "Revised Contents of the Monthly Operating Report."	Upon implementation of approved Technical Specification amendment, reporting will be made by the last day of the month following the end of each calendar quarter.