

Britt T. McKinney
Sr. Vice President & Chief Nuclear Officer

PPL Susquehanna, LLC
769 Salem Boulevard
Berwick, PA 18603
Tel. 570.542.3149 Fax 570.542.1504
btmckinney@pplweb.com



DEC 15 2006

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Stop OP1-17
Washington, DC 20555-0001

**SUSQUEHANNA STEAM ELECTRIC STATION
SUPPLEMENT TO PROPOSED LICENSE AMENDMENT
NO. 279 FOR UNIT 1 OPERATING LICENSE NO. NPF-14 AND
NO. 248 FOR UNIT 2 OPERATING LICENSE NO. NPF-22
ARTS/MELLLA IMPLEMENTATION - RESPONSE TO
NRC REQUEST FOR ADDITIONAL INFORMATION
PLA-6143**

**Docket Nos. 50-387
and 50-388**

*Reference 1: PLA-5931, B. T. McKinney (PPL) to Document Control Desk (USNRC),
"Susquehanna Steam Electric Station Proposed License Amendment No. 279 for
Unit 1 Operating License No. NPF-14 and 248 for Unit 2 Operating License
No. NPF-22 ARTS/MELLLA Implementation," dated November 18, 2005.*

In accordance with 10 CFR 50.90, PPL Susquehanna, LLC (PPL) submitted a request for a license amendment to the Susquehanna Steam Electric Station (SSES) Unit 1 and Unit 2 Technical Specifications to implement an expanded operating domain resulting from the implementation of Average Power Range Monitor/Rod Block Monitor/Technical Specifications/Maximum Extended Load Line Limit Analysis (ARTS/MELLLA) (Reference 1).

The purpose of this letter is to supplement the Reference 1 submittal to delete the requirement to perform SR 3.3.2.1.4 on the Rod Block Monitor Inop FUNCTION. The Attachment to this letter provides the basis for this supplemental request.

PPL has reviewed the "No Significant Hazards Consideration" and the "Environmental Consideration" submitted with Reference 1 relative to this supplemental information. We have determined that there are no changes required to either of these documents.

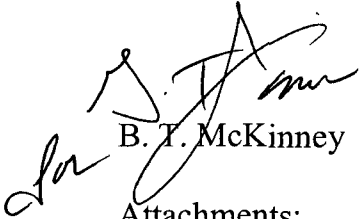
PPL respectfully requests that NRC expeditiously complete the review and approval of the proposed ARTS/MELLLA License Amendment Request proposed in Reference 1. PPL continues to plan to implement ARTS/MELLLA for Unit 2 during the startup from the Spring 2007 Outage.

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If you have any questions or require additional information, please contact Mr. Michael Crowthers at (610) 774-7766.

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

Executed on: December 15, 2006


B. T. McKinney

Attachments:

Attachment - Supplement to PLA-5931

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

Attachment to PLA-6143

Supplement to PLA-5931

Supplement to PLA-5931

In the Reference 1 submittal, PPL inadvertently failed to delete the applicability of SR 3.3.2.1.4 from the Rod Block Monitor (RBM) Inop FUNCTION in Table 3.3.2.1-1. The SR 3.3.2.1.4 shown in the SSES Unit 1 and Unit 2 Technical Specifications (TS) markups for the RBM Inop FUNCTION in Table 3.3.2.1-1 should have been crossed out.

This oversight was recently identified during implementation preparation activities for ARTS/MELLLA, scheduled to be implemented in the Spring of 2007 on SSES Unit 2.

The RBM Inop FUNCTION inserts a rod block when too few LPRM detectors are available. The RBM Inop FUNCTION is not affected by the proposed implementation of ARTS/MELLLA, as described on page 4-5 of Reference 1, Attachment 3.

The current SSES TS, Table 3.3.2.1-1 note "(a)" requires the RBM Inop FUNCTION 1.b to be applicable in MODE 1 at $\geq 30\%$ RTP. The SR 3.3.2.1.4 requires verification that the RBM Inop FUNCTION is not bypassed at $\geq 30\%$ RTP. This SR is duplicative to the LCO applicability for the RBM Inop FUNCTION. If the RBM Inop FUNCTION is bypassed, it is not capable of performing its function as described in the TS and thus is not OPERABLE. This SR and the LCO Applicability requirement are verified by SSES startup procedures by verifying that the bypass for all RBM functions is cleared at $<30\%$ power.

The SSES ARTS/MELLLA application proposes a revised SR 3.3.2.1.4 and revised Table 3.3.2.1-1 function applicability notes. The revised SR is worded such that the SR excludes the RBM Inop FUNCTION, unlike the current SSES SR. The revised SR is presented in "INSERT ARTS-1" of Reference 1. The revised Table 3.3.2.1-1 function applicability notes are presented in "INSERT ARTS-3" of Reference 1. The new notes that apply to the RBM Inop FUNCTION collectively require the RBM Inop FUNCTION to be applicable at $\geq 28\%$ RTP with MCPR less than the limits specified in the COLR.

The revised SR 3.3.2.1.4 wording and revised Table 3.3.2.1-1 notes are consistent with NUREG 1433 Revision 3. The SSES proposed revised SR and Table 3.3.2.1-1 notes are also consistent with the SR wording in the NRC-approved NEDC-32410P-A, Volume 2, "Nuclear Measurement Analysis and Control, Power Range Neutron Monitor (NUMAC PRNM) Retrofit Plus Option III Stability Trip Function," Class III, October 1995.

The SR 3.3.2.1.4 is not required to be applied to the RBM Inop FUNCTION by the NUREG or the NRC-approved NEDC since the RBM Inop FUNCTION is required by the LCO Applicability (Table 3.3.2.1-1 function applicability notes) to be OPERABLE at the power levels required by the RBM to perform its protective safety functions. Inclusion of an SR in TS to verify that an LCO Applicability requirement is met is not required nor is it part of the NUREG format, and thus inclusion of an SR of this type provides no added assurance of safety.

The revised TS markups showing the deletion of SR 3.3.2.1.4 for the RBM Inop FUNCTION in Table 3.3.2.1-1 are attached.

Reference:

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ARTS/MELLLA Implementation," dated November 18, 2005.

Units 1 & 2

Revised Technical Specification

Table 3.3.2.1-1 Markups

(Deletion of SR 3.3.2.1.4 from Function 1.b)

Table 3.3.2.1-1 (page 1 of 1)
Control Rod Block Instrumentation

INSERT ARTS-2

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Rod Block Monitor				
a. Low Power Range-Upscale	1 ^(a)	2	SR 3.3.2.1.1 SR 3.3.2.1.4 SR 3.3.2.1.7	$\leq 0.58W + 55\%$ ^(b)
d. Inop	(d)(e)	2	SR 3.3.2.1.1 SR 3.3.2.1.4	NA
c. Downscale	1 ^(a)	2	SR 3.3.2.1.1 SR 3.3.2.1.4 SR 3.3.2.1.7	$\geq 3/125$ divisions of full scale
2. Rod Worth Minimizer	(g)	1	SR 3.3.2.1.2 SR 3.3.2.1.3 SR 3.3.2.1.5 SR 3.3.2.1.8	NA
3. Reactor Mode Switch—Shutdown Position	(d)(h)	2	SR 3.3.2.1.6	NA

(a) When THERMAL POWER is $\geq 30\%$ RTP

(b) $\leq 0.58W + 50\%$ RTP when reset for single loop operation per LCO 3.4.1, "Recirculation Loops Operating"

(g) With THERMAL POWER $\leq 10\%$ RTP.

(h) Reactor mode switch in the shutdown position.

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INSERT 10

A

INSERT ARTS-3

Table 3.3.2.1-1 (page 1 of 1)
Control Rod Block Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Rod Block Monitor				
a. Low Power Range-Upscale	1 ^M	2	SR 3.3.2.1.1 SR 3.3.2.1.4 SR 3.3.2.1.7	≤ 0.50W + 55% ^M
b. Inop	1 ^M (d)(e)	2	SR 3.3.2.1.1 SR 3.3.2.1.4	Delete per LA 6143
c. Downscale	1 ^M	2	SR 3.3.2.1.1 SR 3.3.2.1.4 SR 3.3.2.1.7	≥ 3/125 divisions of SA scale
2. Rod Worth Minimizer	1 ^M (g)	1	SR 3.3.2.1.2 SR 3.3.2.1.3 SR 3.3.2.1.5 SR 3.3.2.1.8	NA
3. Reactor Mode Switch—Shutdown Position	1 ^M (h)	2	SR 3.3.2.1.6	NA
(a) When THERMAL POWER is ≥ 80% RTP				DELETE
(b) ≤ 0.50W + 50% RTP when used for single loop operation per LCO 3.4.1, Recirculation Loops Operating				DELETE
(g) With THERMAL POWER ≤ 10% RTP.				
(h) Reactor mode switch in the shutdown position.				
INSERT 10				
INSERT ACTS-3				