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SUSQUEHANNA STEAM ELECTRIC STATION
REQUEST FOR ADDITIONAL INFORMATION FOR THE
REVIEW OF THE SUSQUEHANNA STEAM ELECTRIC STATION
UNITS 1 AND 2, LICENSE RENEWAL APPLICATION (LRA)
APPENDIX B **Docket Nos. 50-387**
PLA-6378 **and 50-388**

References: 1) *PLA-6110, Mr. B. T. McKinney (PPL) to Document Control Desk (USNRC), "Application for Renewed Operating License Numbers NPF-14 and NPF-22," dated September 13, 2006.*

2) *Letter from Ms. E. H. Gettys (USNRC) to Mr. B. T. McKinney (PPL), "Request for Additional Information for the Review of the Susquehanna Steam Electric Station, Units 1 and 2 License Renewal Application," dated June 10, 2008.*

In accordance with the requirements of 10 CFR 50, 51, and 54, PPL requested the renewal of the operating licenses for the Susquehanna Steam Electric Station (SSES) Units 1 and 2 in Reference 1.

Reference 2 is a request for additional information (RAI) related to License Renewal Application (LRA) Appendix B. The enclosure to this letter provides the PPL response to the RAI.

If you have any questions, 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: 7/8/08

B. T. McKinney

A120
NRR

Enclosure: PPL Responses to NRC's Request for Additional Information (RAI)

Copy: NRC Region I
Ms. E. H. Gettys, NRC Project Manager, License Renewal, Safety
Mr. R. Janati, DEP/BRP
Mr. F. W. Jaxheimer, NRC Sr. Resident Inspector
Mr. A. L. Stuyvenberg, NRC Project Manager, License Renewal, Environmental

Enclosure to PLA-6378
PPL Responses to NRC's
Request for Additional Information (RAI)

RAI B.2.1

The staff has determined that the license renewal application (LRA) includes the following new aging management programs (AMPs) that have yet to be implemented at the Susquehanna Steam Electric Station, Units 1 and 2.

- Area-Based NSAS Inspection Program
- Buried Piping and Tanks Inspection Program
- Buried Piping Surveillance Program
- Chemistry Effectiveness Inspection Program
- Condensate And Refueling Water Storage Tanks Inspection Program
- Cooling Units Inspection Program
- Heat Exchanger Inspection Program
- Lubricating Oil Inspection Program
- Main Steam Flow Restrictor Inspection Program
- Metal-Enclosed Bus Inspection Program
- Monitoring and Collection System Inspection Program
- Non-EQ Cables and Connections Used In Low-Current Instrumentation Circuits Program
- Non-EQ Electrical Cables and Connections Visual Inspection Program
- Non-EQ Electrical Cable Connections Visual Inspection Program
- Non-EQ Inaccessible Medium Voltage Cables Program
- Selective Leaching Inspection Program
- Small Bore Class 1 Piping Inspection Program
- Supplemental Piping/Tanks Inspection Program
- Thermal Aging and Neutron Irradiation Embrittlement of Cast Austenitic Stainless Steel (CASS) Program

Section A.1.2.3.10, item 2 of Appendix A of the "Standard Review Plan for License Renewal Applications for Nuclear Power Plants," (SRP-LR), Revision 1, makes the following recommendation in regard to providing operating experience for the new programs to the NRC:

> *"An applicant may have to commit to providing operating experience in the future for new programs to confirm their effectiveness."*

The staff requests that, consistent with the statement in the SRP-LR, that the applicant make a commitment to provide operating experience in the future to the staff for those new AMPS to confirm their effectiveness for the period of extended operation.

PPL Response:

The effectiveness of the new AMPs, during the period of extended operation, will be confirmed by the existing Corrective Action Program. Therefore, PPL has determined that a separate commitment to provide operating experience in the future for the new AMPS is not necessary.

License Renewal commitments to implement the new AMPs are included in the SSES LRA. The commitment to manage the aging effects through these new AMPS along with application of existing programs, such as the corrective action program, will assure their effectiveness.

Operating experience for the new aging management programs, described in LRA Appendix B, will be gained as these new programs are implemented during the period of extended operation. Results of tests, inspections, and other aging management activities conducted in accordance with these programs will be subject to the confirmation and corrective action elements of the Susquehanna 10CFR50 Appendix B quality assurance program. Additionally, these results will be subject to NRC review during regional inspections under existing NRC inspection modules.

The following new programs will be implemented prior to, and continue through, the period of extended operation.

- Buried Piping and Tanks Inspection Program
- Buried Piping Surveillance Program
- Metal-Enclosed Bus Inspection Program
- Non-EQ Cables and Connections Used In Low-Current Instrumentation Circuits Program
- Non-EQ Electrical Cables and Connections Visual Inspection Program
- Non-EQ Electrical Cable Connections Program
- Non-EQ Inaccessible Medium-Voltage Cables Program
- Thermal Aging and Neutron Embrittlement of Cast Austenitic Stainless Steel (CASS) Program

As stated above, operating experience will be gained for these programs as they are implemented. Test and inspection results that do not meet acceptance criteria for these new programs will be evaluated under the station's corrective action program. The corrective action program includes requirements for identification of appropriate corrective actions and verification of the effectiveness of corrective actions. Those items entered into the corrective action program are available to the NRC Resident Inspector.

The remainder of the items, included in the new AMPS identified in RAI B.2.1, are the following one-time inspections.

- Area-Based NSAS Inspection
- Chemistry Program Effectiveness Inspection
- Condensate And Refueling Water Storage Tanks Inspection
- Cooling Units Inspection
- Heat Exchanger Inspection
- Lubricating Oil Inspection
- Main Steam Flow Restrictor Inspection
- Monitoring and Collection System Inspection
- Selective Leaching Inspection
- Small Bore Class 1 Piping Inspection
- Supplemental Piping/Tank Inspection

These one-time inspections will be performed prior to entry into the period of extended operation to confirm the effectiveness of existing aging management programs. These programs are subject to review under NRC Inspection Procedure 71003, Post-Approval Site Inspection for License Renewal. Any results that do not meet the inspection acceptance criteria will be entered into the station corrective action program, which is also available to the NRC Resident Inspector.