**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

AUG 0 5 2008

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

**SUSQUEHANNA STEAM ELECTRIC STATION**
**RELIEF REQUEST 2RR07 FOR THIRD TEN-YEAR**
**INTERVAL INSERVICE TESTING PROGRAM PLAN**
**FOR SUSQUEHANNA SES UNIT 2** **Docket No. 50-388**
**PLA-6404**

Attached please find, pursuant to 10 CFR 50.55a, "Codes and Standards," paragraph (a)(3)(i), a request for relief from the requirements of ASME OM Code, ISTC-5221(c)(3) for the Unit 2 High Pressure Coolant Injection (HPCI) Turbine Exhaust to Suppression Pool vacuum exhaust line check valve 255F076. The basis for the relief request is that the proposed alternative would provide an equivalent level of quality and safety. This proposed alternative is a one-time extension of the eight-year Inservice Test (IST) interval to correspond with the scheduled commencement of the next Unit 2 Refuel Outage.

PPL requests NRC approval of proposed Relief Request 2RR07 to the Third Ten-Year Interval IST Program Plan for Susquehanna SES Unit 2 be approved by February 1, 2009 to provide sufficient time to schedule and plan for the activity during the refuel outage.

No new regulatory commitments are made herein.

Should you have any questions, please contact Dayne R. Brophy, at (570) 542-3365.

Sincerely,

B. T. McKinney

A047
NRR

Attachment 1 – Revision 0 to Relief Request 2RR07

cc: Regional Administrator – Region 1
Mr. R. R. Janati, DEP/BRP
Mr. F. W. Jaxheimer, NRC Sr. Resident Inspector
Mr. B. K. Vaidya, NRC Project Manager

# ATTACHMENT 1 TO PLA-6404

# REVISION 0 TO

# RELIEF REQUEST 2RR07

## 1. ASME Code Component Affected

PPL Susquehanna Unit 2, High Pressure Coolant Injection (HPCI) Turbine Exhaust to Suppression Pool vacuum breaker line check valve, 255F076; Model number W8121381; Manufacturer: Anchor Darling Valve Company.

Function
This check valve is in the HPCI turbine exhaust line. It has an open safety function to prevent a vacuum relief path for the turbine exhaust line. It has a close safety function to prevent steam flow into the suppression chamber. The valve has no containment isolation function. The open and closed safety functions of the valve are currently verified by valve disassembly and examination.

## 2. Applicable Code Edition and Addenda

American Society of Mechanical Engineers (ASME)/American National Standards Institute, "Code for Operation and Maintenance of Nuclear Power Plants" (ASME OM Code), 1998 Edition through OMb-2000 Addenda.

## 3. Applicable Code Requirement

ASME OM Code, 1998 Edition through OMb-2000 Addenda.

ISTC-5221(c)(3), "Valve Obturator Movement"

"At least one valve from each group shall be disassembled and examined at each refueling outage; all valves in each group shall be disassembled and examined at least once every 8 years."

## 4. Basis for Relief

Pursuant to 10 CFR 50.55a, "Codes and Standards," paragraph (a)(3), relief is requested from the requirements of ASME OM Code ISTC-5221(c)(3). "At least one valve from each group shall be disassembled and examined at each refueling outage; all valves in each group shall be disassembled and examined at least once every 8 years." The basis of the relief request is that the proposed alternative would provide an acceptable level of quality and safety.

ASME OM Code, 1998 Edition through OMb-2000 Addenda, Section ISTC-5221(c) permits disassembly and examination of check valves when it is impractical to verify obturator movement. The Unit 2 High Pressure Coolant Injection (HPCI) Turbine Exhaust to Suppression Pool vacuum breaker line check valve, 255F076, has no external means for exercising the valve and no external position indication. Due to the lack of installed flow or pressure indication and a lack of test connections, it is not

possible to use other means to verify the open and close exercising of this check valve. Disassembly and examination of the valve is the only feasible method to verify operability.

The check valve is grouped with similar valves as required by ASME OM Code 1998 through OMb-2000 Addenda, Section ISTC-5221(c)(1). This group contains four valves: 249F064, 249F063, 255F076 and 255F077. The last disassembly and examination of check valve 255F076 occurred on March 23, 2001 during a refueling outage; therefore, to comply with the eight-year Code requirement the next disassembly and examination is due by March 22, 2009. The next scheduled Refuel Outage is scheduled to commence in early April 2009, which exceeds the eight-year Code requirement. There have been no problems identified during the previous disassembly/examinations of this valve or the other valves associated with this group. Extending the required inspection interval by one month for check valve 255F076 would not have an adverse impact on quality or nuclear safety.

## 4. Proposed Alternative

Pursuant to 10 CFR 50.55a(a)(3)(i), PPL proposes an alternative testing frequency for performing inservice testing to the HPCI check valve 255F076. The HPCI check valve 255F076 will be tested on a frequency of 8 years and one month to correspond with the extended operating cycle in lieu of the 8 year requirement currently allowed by the ASME OM Code, 1998 Edition through OMb 2000 Addenda, ISTC-5221 (c )(3), "Valve Obturator Movement." The other valves in this group have been tested within the required eight-year frequency of the Code.

## 5. Duration of Proposed Alternative

The proposed alternative is requested as a one-time extension from an eight-year frequency to an eight-year and one-month frequency for the HPCI check valve, 255F076. The extension will allow disassembly and inspection during the April 2009 Unit 2 Refuel Outage.