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SEP 26 2008



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

SUSQUEHANNA STEAM ELECTRIC STATION SECOND ANNUAL AMENDMENT TO THE APPLICATION FOR RENEWED OPERATING LICENSE NUMBERS NPF-14 AND NPF-22 PURSUANT TO 10 CFR 54.21(b)

Docket Nos. 50-387 and 50-388

PLA-6429

- 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) PLA-6271, Mr. B. T. McKinney (PPL) to Document Control Desk (USNRC), "Annual Amendment to the Application for Renewed Operating License Numbers NPF-14 and NPF-22 Pursuant to 10 CFR 54.21(b)," dated September 12, 2007.
 - 3) PLA-6310, Mr. B. T. McKinney (PPL) to Document Control Desk (USNRC), "Units 1 and 2 License Renewal Application (LRA) Extended Power Uprate (EPU) Impacts on LRA" dated February 7, 2008.

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

The License Renewal Rule, 10 CFR 54.21(b), requires that each year following submittal of a license renewal application (LRA), and at least 3 months before scheduled completion of the NRC review, an amendment to the renewal application must be submitted that identifies any change to the current licensing basis (CLB) of the facility that materially affects the content of the LRA.

In accordance with this requirement, PPL performed a review of CLB changes since the submittal of Reference 2, to determine whether any sections of the LRA were affected by these changes.

The PPL review identified that NRC's issuance of SSES license amendments for implementation of Extended Power Uprate (EPU) on Units 1 and 2 did affect the SSES CLB. However, these amendments were previously anticipated and incorporated in the

LRA submittal in September 2006 (Reference 1), and PPL has confirmed that the final amendments, as issued, do not require any additional changes to the LRA, consistent with the discussion in Reference 3.

The PPL review also identified one engineering change that has been implemented at SSES subsequent to the Reference 2 submittal that materially affected the contents of the LRA. This change relocated an HVAC system air intake, which resulted in material and environment combinations that had not been previously evaluated in the SSES LRA. The enclosure to this letter provides an amendment to various sections of the SSES LRA to address this change.

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: <u>92608</u>

B. T. McKinney

Enclosure: Amendment to SSES License Renewal Application (LRA) Second Annual (2008) Update

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-6429 Amendment to SSES License Renewal Application (LRA) Second Annual (2008) Update

LRA Amendment

As part of implementation of the Alternate Source Term (AST), PPL modification EC 793950 extended the control room air intake ductwork. This extension added ductwork and supports on the exterior of the Control Structure and Reactor Building. The environments for Ductwork, Duct Bolting, Flexible Connections (ductwork) and HVAC Duct Supports originally identified in the LRA do not account for Outdoor Air and Exposed to Weather environments. The added ductwork is evaluated with the Standby Gas Treatment System (SGTS) described in LRA Section 2.3.2.7, as it provides the path for outdoor makeup air to SGTS.

The SSES LRA is amended as follows:

3.2 AGING MANAGEMENT OF ENGINEERED SAFETY FEATURES

- 3.2.2.1.7 Standby Gas Treatment System
- ➤ The Environments discussion under Section 3.2.2.1.7 (LRA page 3.2-9) is revised by addition (**bold italics**).

Environments

The Standby Gas Treatment System components are exposed to the following environments:

- > The following bullet is added to the text (LRA page 3.2-9).
 - Indoor Air
 - Outdoor Air
 - Raw Water
 - Ventilation

3.2 AGING MANAGEMENT OF ENGINEERED SAFETY FEATURES

3.2.3 Conclusions

Table 3.2.2-7, Aging Management Review Results – Standby Gas Treatment System

> Table 3.2.2-7 (LRA pages 3.2-97 through 3.2-103) is revised by addition (**bold italics**).

Table 3.2.2-7	Aging N	lanagement Re	eview Results – S	Standby Gas Trea	atment System			
Component / Commodity	Intended Function	Material	Environment	Aging Effect Requiring Management	Aging Management Programs	NUREG- 1801 Volume 2 Item	Table 1 Item	Notes
Duct Bolting	Pressure Boundary	Galvanized Steel	Outdoor Air (External)	Loss of Material	Bolting Integrity Program	N/A	N/A	н
Ductwork	Pressure Boundary	Galvanized Steel	Ventilation (Internal)	None Identified	None Required	V.F-1	3.2.1-51	A, 0204
			Outdoor Air (external)	Loss of Material	System Walkdown Program	N/A	N/A	Н
Flexible Connections (Ductwork)	Pressure Boundary	Neoprene	Ventilation (Internal)	Change in Material Properties	System Walkdown Program	V.B-4	3.2.1-11	E
			Outdoor Air (external)	Change in Material Properties	System Walkdown Program	N/A	N/A	G

3.5 AGING MANAGEMENT OF CONTAINMENTS, STRUCTURES, AND COMPONENT SUPPORTS

3.5.3 Conclusions

Table 3.5.2-10, Aging Management Review Results – Bulk Commodities

➤ The following line Item in Table 3.5.2-10 (LRA page 3.5-119) is revised by addition (**bold italics**).

Table 3.5.2-10 Aging Management Review Results – Bulk Commodities										
Component / Commodity	Intended Function ¹	Material	Environment	Aging Effect Requiring Management	Aging Management Programs	NUREG- 1801 Volume 2 Item	Table 1 Item	Notes		
HVAC Duct Supports	SNS, SRE, SSR	Carbon Steel	Protected from Weather	Loss of material	Structures Monitoring Program	III.B2-10	3.5.1-39	Α		
		Galvanized Steel	Protected from Weather	None	None	III.B2-5	3.5.1-58	Α		
		Galvanized Steel	Exposed to Weather	Loss of material	Structures Monitoring Program	III.B2-7	3.5.1-50	A		