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OCT 21 2008

U. S. Nuclear Regulatory Commission
Document Control Desk
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Washington, DC 20555

SUSQUEHANNA STEAM ELECTRIC STATION
UNITS 1 AND 2, LICENSE RENEWAL APPLICATION (LRA)
AMENDMENTS TO SECTIONS B.2.13, B.2.17, B.2.20, B.2.22,
B.2.28, B.2.32, AND B.2.48
IN RESPONSE TO NRC REGIONAL INSPECTION
PLA-6435

Docket Nos. 50-387
and 50-388

Reference: 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-6375, Mr. B. T. McKinney (PPL) to Document Control Desk (USNRC), "Request for Additional Information for the Review of the Susquehanna Steam Electric Station Units 1 and 2, License Renewal Application (LRA) Sections B.2.11, B.2.13, B.2.16, and B.2.17," dated June 30, 2008.*

3) *PLA-6390, Mr. B. T. McKinney (PPL) to Document Control Desk (USNRC), "Request for Additional Information for the Review of the Susquehanna Steam Electric Station Units 1 and 2, License Renewal Application (LRA) Sections B.2.2, B.2.20, and B.2.22," dated July 17, 2008.*

4) *PLA-6391, Mr. B. T. McKinney (PPL) to Document Control Desk (USNRC), "Request for Additional Information for the Review of the Susquehanna Steam Electric Station Units 1 and 2, License Renewal Application (LRA) Sections B.2.23, B.2.24, B.2.26, B.2.27, B.2.28, B.2.31," dated July 25, 2008.*

5) *PLA-6399, Mr. B. T. McKinney (PPL) to Document Control Desk (USNRC), "Request for Additional Information for the Review of the Susquehanna Steam Electric Station Units 1 and 2, License Renewal Application (LRA) Sections B.2.48, 3.0.3, 3.3.1, and 3.3.2," dated August 8, 2008.*

6) *PLA-6400, Mr. B. T. McKinney (PPL) to Document Control Desk (USNRC), "Request for Additional Information for the Review of the Susquehanna Steam Electric Station Units 1 and 2, License Renewal Application (LRA) Sections B.2.14, B.2.25, B.2.32, and B.2.33," dated August 12, 2008.*

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NRR

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.

The License Renewal process includes an inspection by regional inspectors to verify the applicant's license renewal program is implemented in accordance with the requirements of 10 CFR 54. NRC conducted a regional inspection of the SSES LRA from August 11, 2008 through August 29, 2008.

As a result of the inspection, the following Aging Management Programs (AMP) in the SSES LRA are revised.

- B.2.13 – Piping Corrosion Program
- B.2.17 – Fire Water System Program
- B.2.20 – Fuel Oil Chemistry Program
- B.2.22 – Chemistry Program Effectiveness Inspection
- B.2.28 – Supplemental Piping/Tank Inspection
- B.2.32 – System Walkdown Program
- B.2.48 – Preventive Maintenance Activities – RCIC/HPCI Turbine Casings

The LRA changes to resolve the issues identified during the inspection are included in the enclosure.

There is one new regulatory commitment contained herein. Commitment #58, regarding actions taken in response to NRC Generic Letter 88-14 is added to LRA Table A-1. In addition, license renewal commitments #13, #28, #42, and #46 have been revised as shown in the enclosure.

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: 10/21/2008

GJ Gannon for BT McKinney

B. T. McKinney

Enclosure: PPL Responses to NRC's Regional Inspection Items

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-6435
PPL Responses to NRC's
Regional Inspection Items

NRC Inspection Issues Related to AMP B.2.13 – Piping Corrosion Program

PPL Response:

The Piping Corrosion Program as described in the LRA is revised to credit protective coatings and opportunistic visual inspections. The LRA changes are as follows:

A.1.2.38 Piping Corrosion Program

- The second and third paragraphs under Piping Corrosion Program in Section A.1.2.38 (LRA page A-17) are revised by addition (***bold italics***) as follows (Note: Changes made previously via Reference 2 in response to RAI B.2.13-1 are included for clarity):

The Piping Corrosion Program is a combination of a condition monitoring program (consisting of inspections, surveillances, and testing to detect the presence of, and to assess the extent of, ***damaged coatings,*** fouling and loss of material) and a mitigation program (consisting of chemical treatments and cleaning activities to minimize fouling and loss of material***, and use of protective coatings in areas vulnerable to erosion***).

Prior to the period of extended operation, the Piping Corrosion Program will be enhanced to include the Standby Gas Treatment System loop seals***, and to also incorporate performance, documentation and trending of opportunistic visual inspections (during normal maintenance/repair activities).***

Table A-1 SSES License Renewal Commitments

➢ LRA Table A-1, SSES License Renewal Commitments, Item 13 (page A-36), is revised by addition (***bold italics***) as follows (Note: Changes made previously via Reference 2 in response to RAI B.2.13-1 are included for clarity):

Table A-1
SSES License Renewal Commitments

Item Number	Commitment	FSAR Supplement Location (LRA App. A)	Enhancement or Implementation Schedule
13) Piping Corrosion Program	Existing program is credited with the following enhancements: • Include the Standby Gas Treatment System loop seals within the scope of the program. • ***Incorporate performance, documentation and trending of opportunistic visual inspections (during normal maintenance/repair activities) in addition to existing Piping Corrosion Program inspections.***	A.1.2.38	Prior to the period of extended operation

B.2.13 Piping Corrosion Program

➢ The second paragraph under Program Description in Section B.2.13 (LRA page B-45) is revised by addition (***bold italics***) as follows:

The Piping Corrosion Program is a combination of a condition monitoring program (consisting of inspections, surveillances, and testing to detect the presence of, and to assess the extent of, ***damaged coatings,*** fouling and loss of material) and a mitigation program (consisting of chemical treatments and cleaning activities to minimize fouling and loss of material***, and use of protective coatings in areas vulnerable to erosion***). The program fully meets the intent of NRC Generic Letter (GL) 89-13, "Service Water System Problems Affecting Safety-Related Equipment."

➢ The paragraph under Required Enhancements in Section B.2.13 (LRA page B-45) is revised by addition (***bold italics***) as follows (Note: Changes made previously via Reference 2 in response to RAI B.2.13-1 are included for clarity):

Prior to the period of extended operation, the enhancement***s*** listed below will be implemented in the identified program element***s***:

- Scope of Program –

  The program scope will be enhanced to include the Standby Gas Treatment System loop seals.

- ***Monitoring and Trending –***

  The program will incorporate performance, documentation and trending of opportunistic visual inspections (during normal maintenance/repair activities).

NRC Inspection Issues Related to AMP B.2.17 – Fire Water System Program

PPL Response:

The Fire Water System Program as described in the LRA is revised to include additional dry pipe in the inspection sample, requirements for internal inspection of buried piping, and periodic inspection for pipe wall thinning and blockage. The LRA changes are as follows:

A.1.2.19 Fire Water System Program

- The second paragraph under Fire Water System Program in Section A.1.2.19 (LRA page A-11) is revised by addition (***bold italics***) and deletion (~~strikethrough~~), and reformatted for clarity as follows (Note: Changes made previously via Reference 2 in response to RAI B.2.17-4 are included for clarity):

Prior to the period of extended operation, the Fire Water System Program will be enhanced to incorporate*:*

- Sprinkler head sampling/replacements, in accordance with NFPA 25*;*~~;and~~
- Ultrasonic testing of representative above ground portions of water suppression piping that are exposed to water but which do not normally experience flow, are associated with a dry-pipe sprinkler system and may contain stagnant water***, or is pre-action or deluge piping that is normally dry but may have been wetted and not completely dried***;
- ***At least one visual inspection (opportunistic or focused) of the internal surface of buried fire water piping within the 10 year period prior to the period of extended operation; and***
- ***At least one inspection per year of 'wet' fire protection piping for wall thickness and pipe blockage, if no opportunistic inspection is completed.***

Table A-1 SSES License Renewal Commitments

➢ The second bullet in Table A-1, Item Number 46) Fire Water System Program (LRA page A-53) is revised by addition (***bold italics***) and deletion (~~strikethrough~~) as follows (Note: Changes made previously via Reference 2 in response to RAI B.2.17-4 are included for clarity):

Table A-1
SSES License Renewal Commitments

Item Number	Commitment	FSAR Supplement Location (LRA App. A)	Enhancement or Implementation Schedule
46) Fire Water System Program	Existing program is credited with the following enhancements: • The Fire Water System Program will be revised to incorporate sprinkler head sampling/replacements, in accordance with NFPA 25. • ***The Fire Water System Program will be revised to incorporate*** ~~U~~***u***ltrasonic testing of representative above ground portions of water suppression piping that are exposed to water but which do not normally experience flow, ~~or~~ are associated with a dry-pipe sprinkler system and may contain stagnant water***, or is pre-action or deluge piping that is normally dry but may have been wetted and not completely dried.*** • ***Perform at least one visual inspection (opportunistic or focused) of the internal surface of buried fire water piping, within the 10 year period prior to the period of extended operation.*** • ***Perform at least one inspection per year of 'wet' fire protection piping for wall thickness and pipe blockage, if no opportunistic inspection has been completed.***	A.1.2.19	Prior to the period of extended operation.

B.2.17 Fire Water System Program

➢ The last paragraph under "Program Description" in LRA Section B.2.17 (LRA page B-53) is reformatted for clarity and revised by addition (***bold italics***) and deletion (~~strikethrough~~) as follows (Note: Changes made previously via Reference 2 in response to RAI B.2.17-4 are included for clarity):

Program Description

Prior to the period of extended operation the Fire Water System Program will be enhanced to incorporate:

- sprinkler head sampling/replacements, in accordance with NFPA 25~~, and~~***;***
- ultrasonic testing of representative above ground portions of water suppression piping that are exposed to water~~,~~ but which do not normally experience flow, ~~or~~ are associated with a dry-piping sprinkler system and may contain stagnant water, ***or is pre-action or deluge piping that is normally dry but may have been wetted and not completely dried; at least one visual inspection (opportunistic or focused) of the internal surface of buried fire water piping, within the 10 year period prior to the period of extended operation; and***
- ***at least one inspection per year of 'wet' fire protection piping for wall thickness and pipe blockage, if no opportunistic inspection has been completed.***

➢ The second bullet under "Required Enhancements" in LRA Section B.2.17 (LRA page B-54) is revised by addition (***bold italics***) and deletion (~~strikethrough~~) as follows (Note: Changes made previously via Reference 2 in response to RAI B.2.17-4 are included for clarity):

- **Parameters Monitored or Inspected, Detection of Aging Effects –**

  Ultrasonic testing of representative portions of above ground fire protection piping that are exposed to water~~,~~ but do not normally experience flow, ~~or~~ ***are*** associated with a dry-piping sprinkler system and may contain stagnant water, ***or is pre-action or deluge piping that is normally dry, but may have been wetted and not completely dried*** will be performed after the issuance of the renewed license but prior to the end of the current operating term and at reasonable intervals thereafter, based on engineering review of the results.

  Also, within the 10 year period prior to the period of extended operation, at least one visual inspection (opportunistic or focused) of the internal surface of buried fire water piping will be performed. In addition, at least one inspection per year of 'wet' fire protection piping for wall thickness and pipe blockage will be performed, if no opportunistic inspection has been completed.

- The last paragraph under "Conclusion" in LRA Section B.2.17 (LRA page B-55) is revised by addition (***bold italics***) as follows (Note: Changes made previously via Reference 2 in response to RAI B.2.17-4 are included for clarity):

Conclusion

Enhancement of the Fire Water System Program to address sprinkler head testing/replacement and ultrasonic testing of water-suppression lines that do not normally experience flow, ~~or~~ are associated with a dry-pipe sprinkler system and may contain stagnant water, ***or is pre-action or deluge piping that is normally dry, but may have been wetted and not completely dried,*** will provide further assurance that aging effects are managed and subject components will continue to perform their intended functions consistent with the current licensing basis for the period of extended operation.

NRC Inspection Issues Related to AMP B.2.20 – Fuel Oil Chemistry Program, and AMP B.2.22, Chemistry Program Effectiveness Inspection

PPL Response:

The Fuel Oil Chemistry Program evaluation in the LRA does not include ultrasonic testing of the diesel generator fuel oil storage tanks. The AMP evaluation is revised to identify this as an exception to GALL. The Chemistry Program Effectiveness Inspection as described in the LRA is revised to add ultrasonic testing of the diesel generator fuel oil day tank bottoms. The LRA changes are as follows.

B.2.20 Fuel Oil Chemistry Program

- The Program Elements Affected section under Exceptions to NUREG-1801 in Section B.2.20 (LRA pages B-64 & 65) is revised by addition (***bold italics***) as follows:

Exceptions to NUREG-1801

Program Elements Affected:

- ***Detection of Aging Effects -***

  Ultrasonic (UT) thickness measurements are not taken on the bottoms of the diesel generator fuel oil storage tanks. The fuel oil storage tanks are buried, so the external surfaces are inaccessible; the internal surfaces are coated, so coatings would have to be removed in order to conduct UT examinations. UT examinations of diesel generator fuel oil day tank bottoms will be conducted as part of the Chemistry Program Effectiveness Inspection, as described in B.2.22.

B.2.22 Chemistry Program Effectiveness Inspection

- The last paragraph under Scope of Program in Section B.2.22 (LRA page B-69) is revised by addition (***bold italics***) as follows:

A representative sample of components in low flow and stagnant areas (i.e., locations that are isolated from the flow stream and possibly prone to gradual accumulation/concentration of contaminants) will be examined for evidence of loss of material (due to crevice, galvanic, general, or pitting corrosion, and to microbiologically influenced corrosion in fuel oil), or to confirm a lack thereof, and the results applied to the rest of the systems based on engineering evaluation. In addition, the representative sample will include stainless steel components exposed to temperatures greater than 140°F that will be examined for evidence of cracking due to SCC and the results similarly applied to the rest of the systems. ***The bottom of at***

least two diesel generator fuel oil day tanks will also be included for ultrasonic thickness measurement.

- The second paragraph under Detection of Aging Effects in Section B.2.22 (LRA page B-70) is revised by addition (***bold italics***) as follows:

  A sample population will be determined by engineering evaluation and, where practical, focused on components considered to be most susceptible to aging, such as due to their time in service, the severity of conditions during normal plant operations, and any pertinent design margins. ***In addition to this sample population, at least two diesel generator fuel oil day tanks will be included for ultrasonic thickness measurement of the tank bottoms.***

- The second paragraph under Monitoring and Trending in Section B.2.22 (LRA page B-70) is revised by addition (***bold italics***) and deletion (~~strikethrough~~) as follows (Note: Changes made previously via Reference 3 in response to RAI B.2.22-1 are included for clarity):

  Sample size will be determined by engineering evaluation, as described for the Detection of Aging Effects element above. ***An additional ultrasonic thickness measurement of the bottom of at least two diesel generator fuel oil day tanks will also be performed.*** Unacceptable inspection findings will be evaluated using the SSES corrective action process. The evaluation done under the SSES Corrective Action Program will identify appropriate corrective actions including the need to perform additional inspections.

NRC Inspection Issues Related to AMP B.2.28 – Supplemental Piping/Tank Inspection

PPL Response:

The LRA is amended to add stainless steel components located in the diesel generator fuel oil vaults to the scope of the Supplemental Piping/Tank Inspection.

B.2.28 Supplemental Piping/Tank Inspection

➢ The second paragraph under Scope of Program in Section B.2.28 (LRA page B-88) is revised by addition (***bold italics***) as follows (Note: Changes made previously via Reference 4 in response to RAI B.2.28-1 are included for clarity):

- Scope of Program

  Additionally, the Supplemental Piping/Tank Inspection detects and characterizes whether, and to what extent, a loss of material due to crevice and pitting corrosion is occurring (or is likely to occur) for stainless steel surfaces at air-water interfaces in the following systems:

  - Condensate Transfer and Storage, Diesel Generators System, ***Diesel Fuel Oil,*** Fuel Pool Cooling and Cleanup, and Standby Liquid Control systems.

Table 3.3.2-7 Aging Management Review Results – Diesel Fuel Oil System

➢ The following line items in LRA Table 3.3.2-7 (pages 3.3-163 and 166) and Plant-Specific Notes (page 3.3-351) are revised by addition (***bold italic***) as follows:

Component / Commodity	Intended Function	Material	Environment	Aging Effect Requiring Management	Aging Management Programs	NUREG-1801 Volume 2 Item	Table 1 Item	Notes
Tubing (and Fittings)	Pressure Boundary	Stainless Steel	Fuel Oil (Internal)	Loss of Material	Fuel Oil Chemistry Program Chemistry Program Effectiveness Inspection	VII.H1-6	3.3.1-32	B, 0324
			Indoor Air (External)	~~None Identified~~ ***Loss of Material***	~~None Required~~ ***Supplemental Piping/Tank Inspection***	~~VII.J-15~~ ***VII.F2-1***	~~3.3.1-94~~ ***3.3.1-27***	~~A~~ ***E, 0363***
Valve Bodies	Pressure Boundary	Stainless Steel	Fuel Oil (Internal)	Loss of Material	Fuel Oil Chemistry Program Chemistry Program Effectiveness Inspection	VII.H1-6	3.3.1-32	B
			Indoor Air (External)	~~None Identified~~ ***Loss of Material***	~~None Required~~ ***Supplemental Piping/Tank Inspection***	~~VII.J-15~~ ***VII.F2-1***	~~3.3.1-94~~ ***3.3.1-27***	~~A~~ ***E, 0363***

Plant-Specific Notes:	
0363	***The AMP manages loss of material due to crevice and/or pitting corrosion of the components within the Diesel Fuel Oil Tank vault area that may be wetted due to moisture/rain water intrusion.***

NRC Inspection Issues Related to AMP B.2.32 – System Walkdown Program

PPL Response:

The System Walkdown program as described in the LRA is revised to address inspection of normally inaccessible components in underground vaults and inspection of piping penetrations from the building to underground areas. The LRA changes are as follows.

A.1.2.47 System Walkdown Program

- LRA Section A.1.2.47, System Walkdown Program (page A-21), is revised by addition (***bold italics***) as follows (Note: Changes made previously via Reference 6 in response to RAI B.2.32-4 are included for clarity):

Prior to the period of extended operation, the System Walkdown Program will be enhanced to include the license renewal systems that contain mechanical components whose external surfaces require aging management during the period of extended operation. The program will also be enhanced to address opportunistic inspections of normally inaccessible components (e.g., those that are insulated), and those that are accessible only during refueling outages. The program will also be enhanced by addition of a routine activity to inspect elastomers and polymers for cracking and/or change in material properties. ***The program will also be enhanced to sample normally inaccessible components in underground vaults, pits, and manholes. In addition, the program will be enhanced to include a visual and ultrasonic inspection of the external surfaces of piping passing into structures through penetrations (underground piping) for those penetrations with a history of leakage.***

Table A-1 SSES License Renewal Commitments

➢ LRA Table A-1, SSES License Renewal Commitments (page A-44), is revised by addition (***bold italics***) as follows (Note: Changes made previously via Reference 6 in response to RAI B.2.32-4 are included for clarity):

Table A-1
SSES License Renewal Commitments

Item Number	Commitment	FSAR Supplement Location (LRA App. A)	Enhancement or Implementation Schedule
28) System Walkdown Program	Existing program is credited with the following enhancements: • The governing procedure for the System Walkdown Program must be revised to add the listing of systems crediting the program for license renewal. • The governing procedure for the System Walkdown Program must be enhanced to address the license renewal requirement for opportunistic inspections of normally inaccessible components (e.g., those that are insulated), and those that are accessible only during refueling outages. ***For underground vaults/pits/manholes, an initial sample of at least one vault/pit/manhole from each grouping of components with identical material and environment combinations will be inspected prior to entering the period of extended operation. A representative sample of the entire population will be inspected within the first 6 years of the period of extended operation. Results of the inspection activities that require further engineering evaluation/resolution (e.g., sample expansion and inspection frequency changes if degradation is detected), if any, will be evaluated using the SSES corrective action process.*** • ***The governing procedure for the System Walkdown Program will be enhanced to include a visual and ultrasonic inspection of the external***	A.1.2.47	Prior to the period of extended operation

Table A-1 SSES License Renewal Commitments			
Item Number	**Commitment**	**FSAR Supplement Location (LRA App. A)**	**Enhancement or Implementation Schedule**
	surfaces of piping passing into structures through penetrations (underground piping) for those penetrations with a history of leakage. These inspections will be focused on penetrations that are leaking at that time and will include a representative population of each material, environment combination from those piping systems within the scope of license renewal (which includes those for the RHRSW, ESW, and Fire Protection systems) that enter structures below grade. • A routine activity to supplement the existing plant program will be generated to inspect elastomers and polymers for cracking and/or change in material properties. Evidence of surface degradation, such as cracking or discoloration, as well as physical manipulation and/or prodding, will be used as a measure of the material condition.		

B.2.32 System Walkdown Program

➢ LRA Section B.2.32, System Walkdown Program (page B-102), is amended by addition (***bold italics***) as follows:

Required Enhancements

- Detection of Aging Effects –

  The governing procedure for the System Walkdown Program must be enhanced to address the license renewal requirement for opportunistic inspections of normally inaccessible components (e.g., those that are insulated), and those that are accessible only during refueling outages. ***For underground vaults, an initial sample of at least one vault/pit/manhole from each grouping of components with identical material and environment combinations will be inspected prior to entering the period of extended operation. A representative sample of the entire population will be inspected within the first 6 years of the period of extended operation. Results of the inspection activities that require further engineering evaluation/resolution (e.g., sample expansion and inspection frequency changes if degradation is detected), if any, will be evaluated using the SSES corrective action process.***

- ***Detection of Aging Effects –***

  Also, within the 10 year period prior to the period of extended operation, a visual and ultrasonic inspection of the external surfaces of piping passing into structures through penetrations (underground piping) will be performed, for those penetrations with a history of leakage. These inspections will be focused on penetrations that are leaking at that time and will include a representative sample of each material, environment combination from those piping systems within the scope of license renewal (which includes those for the RHRSW, ESW, and Fire Protection systems) that enter structures below grade.

NRC Inspection Issues Related to AMP B.2.48 – Preventive Maintenance Activities – RCIC/HPCI Turbine Casings

PPL Response:

The Preventive Maintenance Activities – RCIC/HPCI Turbine Casings program is revised to clarify acceptance criteria, inspection methods, qualification of inspection personnel and trending of inspection results. The LRA changes are as follows.

A.1.2.39 Preventive Maintenance Activities – RCIC/HPCI Turbine Casings

- LRA Section A.1.2.39 (LRA page A-18) is revised by addition (***bold italics***) as follows:

Prior to the period of extended operation, the Preventive Maintenance Activities – RCIC / HPCI Turbine Casings will be enhanced to incorporate:

- ***A specific step to perform a visual inspection of the RCIC turbine casing.***
- ***Performance of inspections by qualified personnel using VT-3 or equivalent inspection methods, and reporting and trending of inspection results.***
- ***Specific acceptance criteria for inspections.***

Table A-1 SSES License Renewal Commitments

- Table A-1, Item Number 42) Preventive Maintenance Activities – RCIC/HPCI Turbine Casings (LRA page A-50) is revised by addition (***bold italics***) as follows (Note: Changes made previously via Reference 5 in response to RAI B.2.48-1 are included for clarity):

Table A-1 SSES License Renewal Commitments			
Item Number	**Commitment**	**FSAR Supplement Location (LRA App. A)**	**Enhancement or Implementation Schedule**
42) Preventive Maintenance Activities – RCIC/HPCI Turbine Casings	Existing program is credited with the following enhancements***:*** • Include a specific step to perform a visual inspection of the RCIC turbine casing. • ***Add requirements to have inspections performed by qualified personnel using VT-3 or equivalent inspection methods, and to document and trend inspection results.*** • ***Establish specific acceptance criteria for inspection results.*** The program is plant-specific.	A.1.2.39	Prior to the period of extended operation

B 2.48 Preventive Maintenance Activities – RCIC/HPCI Turbine Casings

- The paragraph under Required Enhancements in LRA Section B.2.48 (LRA page B-148) is revised by addition (***bold italics***) as follows (Note: Changes made previously via Reference 5 in response to RAI B.2.48-1 are included for clarity):

Prior to the period of extended operation the enhancements listed below will be implemented in the identified program elements:

- ***Scope of Program –***

  The Preventive Maintenance Activities – RCIC/HPCI Turbine Casings program procedure for the Reactor Core Isolation Cooling turbine will be enhanced to include a specific step to perform a visual inspection of the turbine casing.

- ***Detection of Aging Effects, Monitoring and Trending –***

  Add requirements to have inspections performed by qualified personnel using VT-3 or equivalent inspection methods, and to document and trend inspection results.

- ***Acceptance Criteria –***

  Establish specific acceptance criteria for inspection results, similar to those of ASME Section XI, IWB 3519.1, used for pump casing inspection.

- The Conclusion in LRA Section B.2.48 (LRA page B-148) is revised by addition (***bold italics***) as follows:

Conclusion

The Preventive Maintenance Activities – RCIC/HPCI Turbine Casings has been demonstrated to be capable of detecting and managing loss of material. The continued implementation of the Preventive Maintenance Activities – RCIC/HPCI Turbine Casings provides reasonable assurance that the effects of aging will be managed such that components subject to aging management will continue to perform their intended functions consistent with the current licensing basis for the period of extended operation.

Enhancement of the Preventive Maintenance Activities – RCIC/HPCI Turbine Casings to address acceptance criteria, specify inspection methods, qualification standards for inspection personnel, and trending will provide further assurance that aging effects are managed and that subject components will continue to perform their intended functions consistent with the current licensing basis for the period of extended operation.

NRC Inspection Issues Related to Instrument Air Environment

PPL Response:

A dry air environment was used in the aging management review for components within the scope of license renewal that are supplied by the Instrument Air System. To provide assurance that the Instrument Air System continues to provide a dry air environment throughout the period of extended operation, LRA Table A-1 is revised to include new license renewal commitment #58 to continue the activities at SSES that are credited by PPL to meet the general requirements of NRC Generic Letter 88-14.

Table A-1 SSES License Renewal Commitments

➢ LRA Table A-1 (LRA page A-55) is revised by addition (***bold italics***) as follows:

Table A-1 SSES License Renewal Commitments			
Item Number	**Commitment**	**FSAR Supplement Location (LRA App. A)**	**Enhancement or Implementation Schedule**
58) Activities in Response to NRC Generic Letter 88-14	***Activities credited in the SSES response to NRC Generic Letter 88-14 will be continued throughout the period of extended operation.***	----------	***Ongoing***