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**SUSQUEHANNA STEAM ELECTRIC STATION  
UNITS 1 AND 2, LICENSE RENEWAL APPLICATION (LRA)  
CHANGE TO AGING MANAGEMENT PROGRAM B.2.30  
PLA-6446**

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**Docket Nos. 50-387  
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) *PLA-6430, Mr. B. T. McKinney (PPL) to Document Control Desk (USNRC), "Susquehanna Steam Electric Station Units 1 and 2, License Renewal Application (LRA) Amendments to LRA and RAI Responses," dated September 26, 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.

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, Aging Management Program (AMP) B.2.30, regarding inspection of buried piping and tanks, is revised. The LRA changes are included in the enclosure.

There are no new regulatory commitments as a result of this LRA amendment. However, License Renewal Commitment #26 is revised as shown in the enclosure.

If you have any questions, please contact Mr. Duane L. Filchner at (610) 774-7819.

A120  
NRR

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

Executed on: 11-17-08

*Richard D. Fogelin for W.H. Spence*

W. H. Spence

Enclosure: PPL Response to NRC's Regional Inspection Item B.2.30

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

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**Enclosure to PLA-6446  
PPL Response to NRC's  
Regional Inspection Item B.2.30**

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## NRC Inspection Issue Related to AMP B.2.30 – Buried Piping and Tanks Inspection Program

The Buried Piping and Tanks Inspection Program is revised:

- to clarify the aging effects applicable to buried steel tanks;
- to clarify that buried tanks are subject to opportunistic inspection;
- to include more specific requirements for inspection locations for focused inspections; and
- to identify inspection methods and sample expansion criteria.

The SSES LRA is amended as follows to address these issues.

### **B.2 Aging Management Programs**

#### **B.2.30 Buried Piping and Tanks Inspection Program**

##### **Aging Management Program Elements**

➤ LRA Section B.2.30 (LRA pages B-94 and B-95) is revised by addition (*bold italics*) as follows (Note: Changes to the LRA text, previously submitted in Reference 2, are included but not highlighted):

- **Scope of Program**

The scope of the Buried Piping and Tanks Inspection Program includes buried components that are within the scope of license renewal for SSES. The program is credited for managing loss of material due to crevice, general, and pitting corrosion and microbiologically influenced corrosion (MIC) for buried steel and cast iron piping components. In addition, the program is credited with managing loss of material for buried stainless steel piping components. The buried components within the scope of this program are in the Condensate Transfer and Storage System, Cooling Tower System, Diesel Fuel Oil System, Emergency Service Water System, Fire Protection System, Residual Heat Removal Service Water System, and Water Pretreatment System.

The Buried Piping and Tanks Inspection Program is also credited for managing loss of material due to *crevice*, general, *and pitting* corrosion *and microbiologically influenced corrosion (MIC)* for buried steel tanks in the Diesel Fuel Oil System.

➤ LRA Section B.2.30 (LRA page B-95) is revised by addition (***bold italics***) and deletion (~~strikethrough~~) as follows:

- Parameters Monitored or Inspected

The Integrity of coatings and wrappings for buried components will be visually inspected when piping ***or tanks*** are excavated for maintenance or other reasons. Evidence of damaged wrapping or of coating defects will be documented for further evaluation.

Exterior surfaces of buried stainless steel piping in the Condensate Transfer and Storage System and buried piping in the Fire Protection System will be visually inspected when piping is excavated for maintenance or other reasons. Evidence of corrosion will be documented for further evaluation.

➤ LRA Section B.2.30 (LRA pages B-95 and B-96) is revised by addition (***bold italics***) and deletion (~~strikethrough~~) as follows (Note: Changes to the LRA text, previously submitted in Reference 2, are included but not highlighted):

- Detection of Aging Effects

Integrity of coatings and wrappings will be inspected when components are excavated for maintenance or other reasons. An inspection of ***coated and wrapped*** buried piping will be performed within the 10-year period prior to entering the period of extended operation (i.e., between year 30 and year 40). If an opportunistic inspection has not occurred between year 30 and year 38, an excavation of a section of buried piping for the purpose of inspection will be performed before year 40. An additional inspection of ***coated and wrapped*** buried piping will be performed within 10 years after entering the period of extended operation (i.e., between year 40 and year 50). The inspection location will be established based on evaluation of recent operating experience, ***and*** the condition of buried piping as known based on results of internal inspections or other relevant information. ~~and a risk-based evaluation.~~

***The inspections will be conducted using visual (VT-3 or equivalent) inspection methods and in accordance with plant specifications for coatings and wrappings. Any evidence of degradation will be documented and evaluated through the site corrective action process to determine the need for subsequent (including periodic) inspections, sample expansion, and for monitoring and trending the results.***

Inspections of the uncoated ***cast iron*** Fire Protection System piping and uncoated stainless steel piping in the Condensate Transfer and Storage System will be performed when the piping is excavated for maintenance or other reasons. An inspection of ***both*** the uncoated ***cast iron and stainless steel*** buried piping will be performed within the 10-year period prior to entering the period of extended operation (i.e., between year 30 and year 40). If an opportunistic inspections have not occurred between year 30 and year 38, an excavation of a section of ***each type of***

the piping for the purpose of inspection will be performed before year 40. ~~An~~  
~~a~~Additional inspections of the uncoated buried piping will be performed within  
10 years after entering the period of extended operation (i.e., between year 40 and  
year 50). The inspection locations will be established based on evaluation of recent  
operating experience, *and* the condition of buried piping as known based on results  
of internal inspections or other relevant information. ~~, and a risk-based evaluation.~~

Opportunistic inspections for buried piping *and tanks* are preferable, as the excavation of  
piping solely for purpose of inspection creates the risk of damaging an otherwise intact  
and functioning protective coating or of damaging the piping *or tanks* ~~itself~~ *themselves*

- The LRA Section 3.3 table of plant-specific notes (LRA page 3.3-348) is revised by addition (*bold italics*) and deletion (~~strikethrough~~) as follows to clarify that the same aging effects are applicable to both the buried piping and the buried tanks:

Plant Specific Notes:	
0327	AMP manages loss of material due to crevice and/or pitting, and general corrosion, and MIC for buried piping <i>and tanks</i> . <del>AMP manages loss of material due to general corrosion for buried tanks; crevice and/or pitting corrosion and MIC are not applicable aging mechanisms for buried tanks.</del>

## A.0 Final Safety Analysis Report Supplement

### A.1.4 License Renewal Commitment List

- LRA Table A-1, SSES License Renewal Commitments (LRA page A-43) is revised by addition (*bold italics*) as follows (Note: Changes to the LRA text, previously submitted in Reference 2, are included but not highlighted):

Table A-1 SSES License Renewal Commitment List			
Item Number	Commitment	FSAR Supplement Location (LRA App. A)	Enhancement or Implementation Schedule
26) Buried Piping and Tanks Inspection Program	<p>Program is new.</p> <p>The scope of the Buried Piping and Tanks Inspection Program includes buried components that are within the scope of license renewal for SSES. The program is credited for managing loss of material due to crevice, general, and pitting corrosion and microbiologically influenced corrosion (MIC) for buried steel piping components. In addition, the program is credited with managing loss of material for buried stainless steel piping components. The Buried Piping and Tanks Inspection Program is also credited for managing loss of material due to <i>crevice, general, and pitting</i> corrosion <i>and microbiologically influenced corrosion (MIC)</i> for buried steel tanks in the Diesel Fuel Oil System.</p>	A.1.2.3	Prior to the period of extended operation.