



APR 24 2009

U. S. Nuclear Regulatory Commission
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**SUSQUEHANNA STEAM ELECTRIC STATION
AMENDMENT REQUEST NO. 296 TO UNIT 1 LICENSE NPF-14
AND AMENDMENT REQUEST NO. 266 TO UNIT 2 LICENSE NPF-22:
EMERGENCY CORE COOLING SYSTEM INSTRUMENTATION –
TECHNICAL SPECIFICATION (TS) TABLE 3.3.5.1-1 AND
EDITORIAL CHANGE TO TS 3.10.8.F
SUPPLEMENTAL INFORMATION
PLA-6501**

**Docket Nos. 50-387
and 50-388**

- Reference: 1) *PLA-6235, Mr. W. H. Spence (PPL) to Document Control Desk (USNRC), "Susquehanna Steam Electric Station Amendment Request No. 296 to Unit 1 License NPF-14 and Amendment Request No. 266 to Unit 2 License NPF-22: Emergency Core Cooling System Instrumentation – Technical Specification (TS) Table 3.3.5.1-1 and Editorial Change to TS 3.10.8.F," dated March 24, 2009.*
- 2) *Letter from Technical Specification Task Force (TSTF) to Document Control Desk (USNRC), Industry Plan to Resolve TSTF-493, "Clarify Application of Setpoint Methodology for LSSS Functions," dated February 23, 2009.*

In accordance with the provisions of 10 CFR 50.90, PPL Susquehanna, LLC (PPL) submitted a request for amendment to the Technical Specifications (TS) for Susquehanna Units 1 and 2 in Reference 1.

During teleconferences on April 6, 2009 and April 8, 2009 between PPL and the Nuclear Regulatory Commission (NRC) staff it was determined that Reference 1 contains information that is not pertinent to the amendment request. Therefore, the following paragraph from page 6 of the Enclosure to Reference 1 is deleted:

"Since these float level switches do not provide any automatic trip function for protection against a violation of a Reactor Core Safety Limit (SL), or a Reactor Coolant System Pressure Safety Limit, during an anticipated operational occurrence (AOO), a normal operational transient, or steady state operation, the allowable value for their operation is not considered to be a Limiting Safety System Setting (LSSS)."

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Also discussed were the following:

- PPL makes a regulatory commitment to follow the efforts of the Technical Specification Task Force (TSTF) and NRC to finalize the details and scope of changes needed to resolve the instrument setpoint issue discussed in RIS-2006-17. If the Condensate Storage Tank (CST) Level-Low function is affected by the approved version of TSTF-493 "Clarify Application of Setpoint Methodology for LSSS Functions," then PPL will submit a separate amendment request to implement the approved generic change for the CST Level-Low allowable value. (See Attachment 4).
- The limit switches for the HPCI CST Level – low function are mechanical devices and therefore excluded from the requirement to be annotated with the TSTF-493 footnotes per Reference 2.

The attachments provide supplemental information requested by NRC during the teleconferences. Attachment 1 is the PPL evaluation and drift analysis for the proposed HPCI CST Level-Low allowable value. Attachment 2 is the surveillance procedure to perform quarterly calibration of the CST low level channels. Attachment 3 provides manufacturer's information relative to the subject HPCI CST Level – Low switches.

The existing level switch setpoint tolerances in Attachment 2 are consistent with the current operability evaluation for the HPCI system. The operability evaluation assumes the HPCI suction transfer will occur at a minimum of 43 inches above the CST bottom. Consequently, the setpoint tolerance in the surveillance procedure ensures the level switch actuates at a minimum of 43" above the CST bottom. This conservative setpoint tolerance will be retained, consistent with the operability evaluation, until approval of the new allowable value requested in Reference 1.

The original no significant hazards consideration included in Reference 1 is not affected by the deletion of the aforementioned paragraph from page 6 of Reference 1 or any of the additional information contained herein.

If you have any questions regarding the basis or discussion associated with this change, please direct them to Mr. D. L. Filchner - Nuclear Regulatory Affairs, at (610) 774-7819.

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

Executed on: April 24, 2009

W. H. Spence



Attachments: 1) PPL Calculation EC-037-001
2) PPL Quarterly Surveillance SI-152-308
3) Limit Switch Manufacturer's Information
4) List of Regulatory Commitments

Copy: NRC Region I

Mr. R. Janati, DEP/BRP

Mr. F. W. Jaxheimer, NRC Sr. Resident Inspector

Mr. B. K. Vaidya, NRC Project Manager