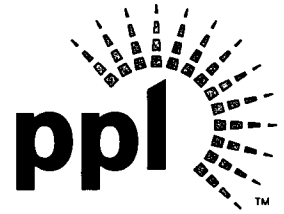


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**SUSQUEHANNA STEAM ELECTRIC STATION  
AMENDMENT REQUEST NO. 305 TO UNIT 1 LICENSE NPF-14  
AND AMENDMENT REQUEST NO. 276 TO UNIT 2 LICENSE  
NPF-22: ONE-TIME EXTENSION OF TECHNICAL SPECIFICATION 3.8.1  
SUPPLEMENTAL ELECTRICAL INFORMATION  
PLA-6509**

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

*Reference: 1) PLA-6480, Mr. W. H. Spence (PPL) to Document Control Desk (USNRC), "Susquehanna Steam Electric Station Amendment Request No. 305 to Unit 1 License NPF-14 and Amendment Request No. 276 to Unit 2 License NPF-22: One Time Extension of Technical Specification 3.8.1 Allowable Completion Time for Offsite AC Circuits," dated March 24, 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 30 and May 1, 2009 between PPL and the Nuclear Regulatory Commission (NRC) staff, it was determined by the NRC staff that supplemental information was necessary to support the electrical portion of the NRC acceptance review of Reference 1.

The attachment provides PPL's response to each of the electrical related questions discussed during the teleconferences.

The supplemental electrical information for each of the responses contained herein does not establish any new or change any existing regulatory commitments, nor does it affect the no significant hazards consideration included in Reference 1.

Any questions regarding the basis or discussion associated with this response should be directed to Mr. D. L. Filchner - Nuclear Regulatory Affairs, at (610) 774-7819.

A001  
NRR

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

Executed on: 5/12/09

W. H. Spence 

Attachment: Responses to Electrical Questions

Copy: NRC Region I  
Mr. R. Janati, DEP/BRP  
Mr. F. W. Jaxheimer, NRC Sr. Resident Inspector  
Mr. B. K. Vaidya, NRC Project Manager

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**Attachment to PLA-6509**

**Responses to Electrical Questions**

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**NRC Electrical QUESTION 1:**

The LAR is lacking a compensatory measure for the offsite circuit, which will be out of service during the 10 days requested (outside the current license basis).

**PPL RESPONSE:**

The LAR, Reference 1, is based on Susquehanna Steam Electric Station (SSES) plant specific risk-informed and deterministic evaluations performed in a manner consistent with the risk-informed approaches endorsed by Regulatory Guide 1.177 "An Approach for Plant – Specific, Risk-Informed Decision Making: Technical Specifications." The calculated increase in risk as measured by incremental conditional core damage probability (ICCDP) and incremental conditional large early release probability (ICLERP) is within the guidelines of Regulatory Guide 1.177. In addition, these small increases in risk are consistent with the Commission's Safety Goal Policy as discussed in Reference 1, section 4.2.1.2.

Reference 1 does specify the compensatory measures that will be implemented when the offsite circuit is out of service for the replacement of ST No. 20. Although not explicitly stated as compensatory measures, the Regulatory Commitments in Attachment 3 of Reference 1 are the compensatory measures that will be implemented when the offsite circuit is out of service for the extended period of time. These Regulatory Commitments/compensatory measures provide the necessary assurance that sufficient electrical equipment is available to mitigate the consequences of a design basis accident and a single active failure.

It should be noted that the proposed compensatory measures in Reference 1 are similar to those that were accepted for an extension to 10 days for an offsite circuit being out of service at St. Lucie in 2003 and for an extension of 24 hours at Palisades in 2008.

As discussed in Reference 1, the increase in risk calculated in the LAR for the extended period of time is reduced with the implementation of the compensatory measures outlined in Attachment 3 of Reference 1.

**NRC Electrical QUESTION 2:**

The LAR does not discuss the applicability (compliance and/or relevance) of LCO 3.0.2.

**PPL RESPONSE:**

PPL will be in compliance with the requirements of LCO 3.0.2 when LCO 3.8.1 Condition A is entered.

The entry into LCO 3.8.1, Condition A with the proposed 10-day Completion Time is not being undertaken for operational convenience. Replacement of ST No. 20 is necessary due to the degradation in insulation capability of the H1 bushing. This replacement is therefore corrective maintenance that is being undertaken to improve the reliability of the offsite source. Corrective maintenance is specifically described in the LCO 3.0.2 Bases as an acceptable reason for intentionally entering an LCO. Therefore, intentional entry into LCO 3.8.1 Condition A Actions with the proposed 10-day Completion Time is acceptable and consistent with the LCO 3.0.2 Bases.

Further, NRC Inspection Manual, Part 9900 – Technical Guidance “Voluntary Entry into Limiting Conditions for Operation Action Statements to Perform Preventative Maintenance” states:

*“Intentional entry into an action statement of an LCO is not a violation of the TS (except in certain cases, such as intentionally creating a loss of function situation or entering LCO 3.0.3 simply for operational convenience).”*

During the teleconferences of April 30 and May 1, 2009, the NRC staff noted that PPL had previously requested two similar one-time extensions for transformer issues. PPL has entered this issue into the SSES Corrective Action Program. This item will investigate possible solutions (both design and licensing changes) which may preclude the necessity to request a similar one-time exemption in the future.