

From: Vaidya, Bhalchandra
Sent: Monday, July 20, 2009 2:04 PM
To: 'dlfilchner@pplweb.com'; 'Coddington, Cornelius T';
'ckhoffman@pplweb.com'; 'O'Rourke, Brenda W'
Cc: Salgado, Nancy; Boska, John; Wilson, George; Miller, Kenn; Waig, Gerald;
Marrero, Abraham; Elliott, Robert; Schulten, Carl
Subject: Susq Units 1 & 2, TAC Nos. ME0969 & ME0970- Draft Follow-up RAIs from
Electrical Engineering Branch (EEEB)

SUBJECT: PPL Susquehanna, Units 1 and 2. – REQUEST FOR ADDITIONAL INFORMATION (RAIs) RE:
License Amendment Request for One-time extension of Allowable Outage Time in TS 3.8.1, LCO ACTION
A3, from 72 hours to 10 days for replacement of Transformer ST-20 (TAC NOS. ME0969 and ME0970)

By letter dated March 24, 2009, supplemented by letters dated April 30 and May 12, you submitted a
license amendment request for One-time extension of Allowable Outage Time in TS 3.8.1, LCO ACTION
A3, from 72 hours to 10 days for replacement of Transformer ST-20. You responded to Technical
Specification Branch (ITSB) RAIs by letter dated June 29, 2009.

Based in its review of your responses, the ITSB needs additional information to complete its review of
the license amendment request mentioned above. The Draft Follow-up RAIs are provided below:

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Draft Follow-up Request for Additional Information:

PPL Susquehanna meets GDC 17 requirements in its design by providing two physically independent
circuits from the offsite transmission network providing redundancy and defense in depth methodology
to the offsite circuit system. Thus the Offsite circuits are redundant in relation to each other.

Rendering ST-20 inoperable at PPL Susquehanna in its current design would require entry into LCO 3.8.1
for one offsite circuit inoperable. TS LCO 3.8.1 allows SSES not to comply with single failure criteria for a
limited period of time. TS Bases for 3.8.1 state "The remaining OPERABLE offsite circuit and DG's are
adequate to supply electrical power to the onsite Class 1E Distribution System. Thus, on a component
basis, single failure protection may have been lost for the required feature's function; however, function
is not lost." Thus removal of ST-20 from service degrades the redundancy of the offsite distribution
system and qualifies ST-20 as a redundant component.

1. Based on the above, explain why intentional removal of one offsite circuit from service at SSES
does not render a redundant component inoperable as stated in RAI responses sent to NRC staff
dated June 29th, 2009.
2. Also Based on the statement above, clarify your response from NRC ITSB QUESTION 2 stating
that the LCO 3.0.2 Bases statement "Intentional entry into ACTIONS should not be made for
operational convenience." does not apply to SSES.

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Please let me know ASAP, the convenient time for a phone call discussion for the clarification of the NRC
staff concerns and requirements.

Bhalchandra K. Vaidya

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