



APR 26 2011

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station OP1-17
Washington, DC 20555

**SUSQUEHANNA STEAM ELECTRIC STATION
DEVIATION FROM BWRVIP-25 INSPECTION
REQUIREMENTS
PLA-6712**

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

Reference: BWR Vessel and Internals Project, BWR Core Plate Inspection and Flaw Evaluation Guidelines (BWRVIP-25), EPRI Report TR-107284, December 1996.

BWRVIP-25 requires that 50% of the core plate rim hold-down bolts of BWR/2-5 plants without repair wedges be examined by enhanced visual methods (EVT-1) from below the core plate or by ultrasonic technique (UT) from above core plate once the technique is developed. However, it was determined that the bolts cannot be inspected by UT due to configuration issues and it has recently been concluded that an EVT-1 exam does not provide meaningful results. Accordingly, a technical justification for deviation from the BWRVIP guidance was developed.

The technical justification included an analysis that found that the bolting has a relatively low susceptibility to cracking and a very high flaw tolerance, and that postulated flaws would not grow to a size that significantly reduces the bolt preload over the life of the plant. Even if significant cracking did occur in the bolting, redundant structural components will prevent adverse displacement of the core plate.

The BWRVIP is currently working on developing revised guidance for the Core Plate bolts and expects to complete that work, including gaining NRC approval of the revised guidance, by 2015. The deviation from BWRVIP-25 guidance will remain in affect until the guidance is revised and implemented in accordance with our current commitments to the BWRVIP Program. Given the low likelihood that the function of the core plate will be compromised by bolting failures, there is little risk in postponing inspections of the bolts until the BWRVIP develops revised guidance.

This letter is being transmitted for information only and PPL Susquehanna, LLC is not requesting any action from the NRC staff.

Should you have any questions, please contact Cornelius T. Coddington
at (610) 774-4019.

Sincerely,

A handwritten signature in black ink, appearing to read "T. S. Rausch". The signature is stylized with large, flowing loops and a prominent initial "T".

T. S. Rausch

Copy: NRC Regional I
Mr. P. W. Finney, NRC Sr. Resident Inspector
Mr. R. R. Janati, DEP/BRP
Mr. B. K. Vaidya, NRC Project Manager