

Faber A. Kearney
Site Vice President

PPL Susquehanna, LLC
769 Salem Boulevard
Berwick, PA 18603
Tel. 570.542.2904 Fax 570.542.1504
fakearney@pplweb.com



OCT 03 2011

U.S. Nuclear Regulatory Commission
Attn.: Document Control Desk
Mail Stop O-P1-17
Washington, DC 20555

**SUSQUEHANNA STEAM ELECTRIC STATION
PROPOSED RELIEF REQUEST NO. 3RR-18 TO
THE THIRD 10-YEAR INSERVICE INSPECTION
PROGRAM FOR SUSQUEHANNA SES UNIT 2
PLA-6753**

Docket No. 50-388

The purpose of this letter is to request relief pursuant to the requirements of 10 CFR 50.55a(a)(3)(i) from provisions of the ASME Section XI, 1998 Edition, 2000 Addenda, Code Category B-A, Item B1.30 and IWB-2420(a), Successive Inspections for the Third 10-Year Inservice Inspection Program for Susquehanna SES (SSES) Unit 2.

In accordance with the PPL Susquehanna, LLC (PPL) Inservice Inspection (ISI) Plan, the AF weld (Shell Course to Vertical Flange Weld), was divided into three Inspection Areas; 0-120 degrees, 120-240 degrees and 240-360 degrees. Each Inspection Area was scheduled for inspection during each period of the Inspection Interval. For Susquehanna SES Unit 2, the AF Weld 0-120 degrees was scheduled for inspection during the first period of the third inspection interval and was performed during the Unit 2 13th RIO with no recordable indications noted.

As part of the outage close out ISI Work Packages, it was discovered that a work package from the U2-13th RIO had not been properly transmitted to the SSES Document Control System (DCS). The work package was for the inspection of the AF Weld (0-120). The work package and associated UT data sheets were missing. A detailed exhaustive search for the documentation was performed without finding the work package and accompanying UT data sheets. There is solid evidence that the UT examination was successfully completed during the U2-13th RIO. The Authorized Nuclear Inspector (ANI) independently recorded this as a completed exam, the ISI database (IDDEAL) shows a completed examination along with an examiner/reviewer and completion date and the "action taken" portion of the associated PCWO identified that the examination was completed satisfactorily. Discussions with the ISI contractor who performed the inspections were unsuccessful in locating the data or datasheet. As a conservative measure, the PPL ISI group did not take credit for the examination that was performed. This issue was entered into the PPL Corrective Action Program.

Additionally, an investigation into this event was undertaken as part of the resolution for this issue. A review was performed on work orders for outages performed to date in the third inspection interval. The outages included the Unit 1 14th RIO, 15th RIO and 16th RIO and the Unit 2 12th RIO, 13th RIO and 14th RIO. The review of the ISI work orders determined that 2957 work orders were archived and stasured in Document Control System. Additionally, a review of approximately 250 Unit 2 13th RIO archived FAC and ASME Section XI piping work order was performed to ensure that the missing data was not incorrectly filed with one of these work packages. The data was not located. No additional inspections were identified as being missing.

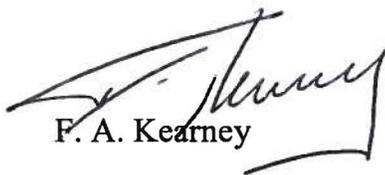
As a result of the missing paperwork, a re-inspection of the AF Weld (0-120 degrees) was performed during the Unit 2 15th RIO. No recordable indications were found. PPL requests relief for SSES Unit 2 to deviate from the requirements of IWB-2420(a) regarding the successive inspection of welds. Instead of distributing the inspection of the AF Weld over three periods of the third inspection interval, PPL will credit two of the exams during the second period of the third inspection interval. For the Fourth 10-Year Inspection Interval, PPL plans to perform the inspection of the AF weld over three periods, as has been our practice.

PPL requests that this relief request be approved by March 27, 2012, in order to support the Unit 2 16th Refuel Outage Planning milestone date.

This letter contains no new commitments.

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

Sincerely,



F. A. Kearney

Enclosure – Relief Request 3RR-18

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

PPL SUSQUEHANNA, LLC

SUSQUEHANNA SES, UNIT 2

PLA-6753

**THIRD 10-YEAR INTERVAL
RELIEF REQUEST NO. 3RR-18**

**PPL SUSQUEHANNA, LLC
SUSQUEHANNA SES, UNIT 2
THIRD 10-YEAR INTERVAL
REQUEST FOR RELIEF NO. 3RR18**

SYSTEM/COMPONENT (S) FOR WHICH RELIEF IS REQUESTED

AF Weld (Shell Course to Vertical Flange Weld) (0-120 degrees)

CODE REQUIREMENTS

The 1998 Edition thru the 2000 Addenda of ASME Section XI, Subsection IWB-2420(a) requires the “sequence of component examination which was established during the first inspection interval shall be repeated during each successive inspection interval, to the extent practical.”

RELIEF REQUESTED

Relief is requested in accordance with 10 CFR 50.55a(a)(3)(i) from the provisions of Subsection IWB-2420(a) for successive examinations.

BASIS FOR RELIEF

IWB-2420(a) requires that “the sequence of component examinations which was established during the first inspection interval shall be repeated during successive inspection interval, to the extent practical.” The Susquehanna SES (SSES) Unit 2 AF Weld (Shell Course to Vertical Flange Weld), was divided into three Inspection Areas: 0-120 degrees, 120-240 degrees and 240-360 degrees. Each Inspection Area was scheduled for inspection during each period of the Inspection Interval. Which was the sequence established during the First 10-year inspection interval. For SSES Unit 2, the AF Weld 0-120 degrees was scheduled for inspection during the first period of the third inspection interval. The inspection was initially performed during the Unit 2 13th Refueling and Inspection Outage (RIO) with no recordable indications noted. As part of the outage close out, a review of the Inservice Inspection (ISI) inspection packages was conducted. During this review, it was discovered that while the inspection had been performed, the inspection record for the inspection could not be found. Because of this, no credit was given for the examination. This event was entered into the PPL Corrective Action Program (CAP) and a review was performed on work orders for outages performed to date in the third inspection interval. No additional problems were identified. The re-examination of the AF Weld (0-120 degrees) was performed during the Unit 2 15th RIO (second outage of the second period) which was the earliest

scheduled outage after the discovery of the missing work package documentation, with no anomalies noted.

ALTERNATIVE EXAMINATIONS

None.

IMPLEMENTATION SCHEDULE

PPL Susquehanna, LLC requests that this relief request be approved by March 27, 2012, in order to support the Unit 2 16th Refuel Outage Planning milestone date.