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APR 02 2012

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

**SUSQUEHANNA STEAM ELECTRIC STATION
REQUEST TO EXPEDITE APPROVAL OF
PPL'S PROPOSED AMENDMENT NUMBER 281 TO UNIT 2
OPERATING LICENSE NO. NPF-22
PLA-6841**

Docket No. 50-388

- References:
1. Letter (PLA-6817) from R. A. Kearney (PPL) to USNRC (Document Control Desk) Titled "Proposed Amendment Number 281 to Unit 2 Operating License No. NPF-22 Temporary Change to Allow Implementation of Multiple Spurious Operations Modifications on SSES Unit 1 4160 v Buses: Technical Specifications 3.8.7 and 3.7.1", Dated March 8, 2012
 2. Email from B. Vaidya (USNRC) to PPL, Titled "Susquehanna Unit 2, ME8152, Draft Request for Additional Information (RAI) from Balance of Plant Branch", Dated March 16, 2012.
 3. Letter (PLA-6828) from J. M. Helsel (PPL) to USNRC (Document Control Desk) Titled "Response to Email (Dated March 16, 2012) Request for Additional Information Proposed Amendment Number 281 to Unit 2 Operating License No. NPF-22", Dated March 23, 2012.
 4. Email from B. Vaidya (USNRC) to PPL, Titled "Susquehanna Unit 2, ME8152, Additional Request for Additional Information (RAI) from Balance of Plant Branch", Dated March 27, 2012.
 5. Letter (PLA-6834) from J. M. Helsel (PPL) to USNRC (Document Control Desk) Titled "Response to Email (Dated March 27, 2012) Request for Additional Information Proposed Amendment Number 281 to Unit 2 Operating License No. NPF-22", Dated March 29, 2012.
 6. Email from B. Vaidya (USNRC) to PPL, Titled "Susquehanna Unit 2 LAR-Clarification of Susquehanna RAI Response dated Mar 23, FW: RAI Clarification, Susquehanna Unit 2 LAR", Dated March 30, 2012.
 7. Letter (PLA-6842) from J. M. Helsel (PPL) to USNRC (Document Control Desk) Titled "Response to Email (Dated March 30, 2012) Request for Additional Information Proposed Amendment Number 281 to Unit 2 Operating License No. NPF-22", Dated April 2, 2012.

The purpose of this letter is to provide supplemental information to the NRC staff regarding PPL's proposed amendment request No. 281. This proposed amendment was submitted on March 8, 2012, and supplemental information in response to NRC's request for additional information (RAI) was provided on March 23, 2012, March 29, 2012 and April 02, 2012. PPL requested this amendment to be processed as an exigent amendment. However, your letter dated March 9, 2012 indicated that the staff found that PPL had not provided sufficient justification for an exigent amendment. It is our understanding that the basis for this decision was the duration of time PPL took in submitting its application for amendment.

During the time between initial discovery of the need for the modification and the amendment submittal, PPL finalized the scope of the modifications through plant walkdowns, engineering meetings, etc. and maintained contact with the NRC to ensure that we were providing NRC Staff the information necessary for their review. Until the modification scope was finalized, PPL could not define the temporary LCO extension needed. The original one-time extension was for 48 hours; however, through reengineering and detailed planning this time was reduced to 24 hours.

Since the Unit outages at Susquehanna SES are scheduled every two years, the scheduled Unit 1 outage in the spring of 2012 provided the first opportunity to implement the required Multiple Spurious Operations (MSO) modifications. Regulatory Guide 1.189 was issued on November 2, 2009. The next scheduled Unit 1 outage was in March 2010. The time between the issuance of Regulatory Guide 1.189 and the Unit 1 Spring 2010 outage did not provide sufficient time to develop the corrective actions and design any modifications for implementation in the Spring 2010 outage, which was concluded in May 2010. PPL's corrective actions were entered into the corrective action program in May 2010 with the design and implementation of the modifications scheduled for the Spring of 2012 outage which was concluded in April 2010.

Implementing the modifications while both Unit 1 and Unit 2 were on line presents unique issues and additional requests for extension of completion times.

First, completion of the modifications requires the performance of Surveillance Requirement (SR) 3.8.1.8 which requires the verification of automatic and manual transfer of unit power supply from the normal offsite circuit to the alternate offsite circuit. This SR is amended by a NOTE that states, "The automatic transfer of the unit power supply shall not be performed in MODE 1 or 2." Justification for not performing the transfer in MODES 1 or 2 is provided in the Technical Specification Bases for this SR. The Bases read in part:

"This SR is modified by a Note. The reason for the Note is that, during operation with the reactor critical, performance of the automatic transfer of the unit power supply could cause perturbations to the electrical distribution systems that could challenge continued steady state operation and, as a result, plant safety systems. The manual transfer of unit power supply should not result in any perturbation to the electrical distribution system; therefore, no mode restriction is specified. This Surveillance tests the applicable logic associated with Unit 1. The comparable test specified in Unit 2 Technical Specifications tests the applicable logic associated with Unit 2. Consequently, a test must be performed within the specified Frequency for each unit. As the Surveillance represents separate tests, the Note specifying the restriction for not performing the test while the unit is in MODE 1 or 2

does not have applicability to Unit 2. The NOTE only applies to Unit 1, thus the Unit 1 Surveillance shall not be performed with Unit 1 in MODE 1 or 2.”

Unit 2 SR 3.8.1.8 contains the same note.

Second, the presently requested Unit 2 Technical Specification completion time extensions would also apply.

Third, Unit 1 Technical Specification 3.7.1 would require extensions for the completion time to 96 hours for a RHRSW loop out of service. In addition, Technical Specification 3.8.7 would require an extension for the completion time for a bus to be out of service from 8 hours to 96 hours.

Based upon the above restrictions, possible safety system challenges and additional completion time requests, it is not prudent to perform these modifications while Unit 1 and Unit 2 are online.

PPL has expeditiously responded to the NRC Staff's questions and it is our understanding that we have satisfactorily resolved all the staff's questions. In addition, PPL understands that the Commonwealth of Pennsylvania did not object to the proposed amendment.

When there is a finding of no significant hazards, 10 C.F.R. § 50.91(a)(5) allows for an amendment to be issued without notice to the public on an emergency basis when failure to act would result in derating or a shutdown of a unit and 10 C.F.R. 50.91(a)(6) allows for a limited comment period where an exigent circumstance exists. An exigent situation is something “short of an emergency” i.e., short of an immediate shutdown or derate. (48 Federal Register 14876) In this case, use of an exigent amendment is appropriate, as there is not an immediate risk of shutdown thus allowing a limited public comment period. PPL recognizes that these provisions should be used when there is a net increase in safety or reliability and in this case, performing the MSO modification without unnecessarily shutting down Unit 2 will result in increased safety to Unit 1 without jeopardizing safety at Unit 2 or reliability for our customers.

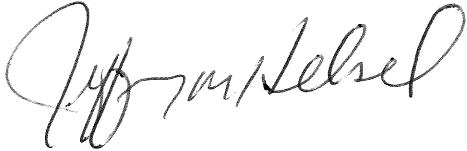
Based on the above, PPL respectfully requests that NRC process this amendment as an exigent amendment or in the alternative, if necessary as an emergency amendment.

There are no regulatory commitments associated with the proposed changes.

PPL Susquehanna, LLC is providing the Commonwealth of Pennsylvania with a copy of this letter.

If you have any questions or require additional information, please contact
Mr. Cornelius T. Coddington at (610) 774-4019.

Sincerely,

A handwritten signature in black ink, appearing to read "J. M. Helsel". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

J. M. Helsel

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

Mr. G. A. Wilson, NRR/DORL/LPL1-1/BC