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JUN 14 2013

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

**SUSQUEHANNA STEAM ELECTRIC STATION  
LICENSEE EVENT REPORT 50-388/2013-001-00  
LICENSE NO. NPF-22  
PLA-7018**

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**Docket No. 50-388**

Attached is Licensee Event Report (LER) 50-388/2013-001-00. The condition reported by this LER was an expected condition, which was the result of planned activities in support of a routine refueling outage. As described in the LER, the U.S Nuclear Regulatory Commission (NRC) provided enforcement guidance, applicable to boiling water reactor licensees, that allows the reported condition. Although this allowance is provided by the NRC's enforcement guidance, the planned activities are still considered reportable in accordance with 10 CFR 50.73(a)(2)(i)(B) as a condition prohibited by Technical Specifications (TS). Specifically, operations with the potential for draining the reactor vessel (OPDRVs) were performed while in Mode 5 without secondary containment being operable, as expected and allowed by the enforcement guidance. With the exception noted in the LER, the provisions contained in NRC enforcement guidance memorandum (EGM) 11-003, Revision 1, "Dispositioning Boiling Water Reactor Licensee Noncompliance with Technical Specification Containment Requirements during Operations with a Potential for Draining the Reactor Vessel," were used during performance of the OPDRVs reported in the enclosed LER.

No regulatory commitments are associated with this LER.

A handwritten signature in blue ink, appearing to read "Jon A. Franke", with the word "for" written below it.

J. A. Franke

Attachment: LER 50-388/2013-001-00

Copy: NRC Region I  
Mr. P. W. Finney, NRC Sr. Resident Inspector  
Mr. J. A. Whited, NRC Project Manager  
Mr. L. J. Winker, DEP/BRP

<b>1. FACILITY NAME</b> Susquehanna Steam Electric Station Unit 2	<b>2. DOCKET NUMBER</b> 05000388	<b>3. PAGE</b> 1 OF 3
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**4. TITLE**  
Implementation of Enforcement Guidance Memorandum (EGM) 11-003, Revision 1

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
04	17	2013	2013	- 001	- 00	06	14	2013	FACILITY NAME	DOCKET NUMBER

<b>9. OPERATING MODE</b> 5	<b>11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §:</b> (Check all that apply)
<b>10. POWER LEVEL</b> 000	

<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(i)(C)	<input type="checkbox"/> 50.73(a)(2)(vii)
<input type="checkbox"/> 20.2201(d)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)
<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(ii)(B)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)
<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 50.36(c)(1)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)(A)
<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 50.36(c)(1)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(iv)(A)	<input type="checkbox"/> 50.73(a)(2)(x)
<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(v)(A)	<input type="checkbox"/> 73.71(a)(4)
<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.46(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(v)(B)	<input type="checkbox"/> 73.71(a)(5)
<input type="checkbox"/> 20.2203(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(C)	<input type="checkbox"/> OTHER
<input type="checkbox"/> 20.2203(a)(2)(vi)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)(B)	<input type="checkbox"/> 50.73(a)(2)(v)(D)	Specify in Abstract below or in NRC Form 366A

**12. LICENSEE CONTACT FOR THIS LER**

NAME T. A. Case Jr. – Senior Engineer, Nuclear Regulatory Affairs	TELEPHONE NUMBER (Include Area Code) (570) 542-3606
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**13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT**

CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX

<b>14. SUPPLEMENTAL REPORT EXPECTED</b> <input type="checkbox"/> YES (If yes, complete 15. EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO	<b>15. EXPECTED SUBMISSION DATE</b>	MONTH	DAY	YEAR

**ABSTRACT** (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)

The condition reported by this LER was an expected condition, which was the result of planned activities in support of a routine refueling outage. As described in the LER, the U.S Nuclear Regulatory Commission (NRC) provided enforcement guidance, applicable to boiling water reactor licensees, that allows the reported condition. Although this allowance is provided by the NRC's enforcement guidance, the planned activities are still considered reportable in accordance with 10 CFR 50.73(a)(2)(i)(B) as a condition prohibited by Technical Specifications (TS).

Between 4/17/2013 and 5/17/2013, Susquehanna performed Operations With the Potential For Draining the Reactor Vessel (OPDRV) activities on Unit 2 while in Mode 5 without an operable secondary containment, as expected and allowed by the enforcement guidance. Although NRC Enforcement Guidance Memorandum (EGM) 11-003, Revision 1 allows the implementation of interim actions as an alternative to full compliance, this condition is still considered a condition prohibited by TS 3.6.4.1. The OPDRV activities were planned activities that were completed under the guidance of plant procedures and are considered to have low safety significance based on interim actions taken. Since these actions were deliberate, no cause determination was necessary. A license amendment request will be submitted following NRC approval of the Technical Specifications Task Force (TSTF) traveler associated with generic resolution of this issue.

**LICENSEE EVENT REPORT (LER)  
CONTINUATION SHEET**

1. FACILITY NAME	2. DOCKET	6. LER NUMBER			3. PAGE
Susquehanna Steam Electric Station, Unit 2	05000388	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 3
		2013	- 001	- 00	

**NARRATIVE**EVENT DESCRIPTION

While in Mode 5, Refueling, OPDRVs were performed as part of the Unit 2 16th Refueling and Inspection Outage (U216RIO) without an operable secondary containment. The event timeline is as follows:

4/16/2013 22:00 – Entered Unit 2 Limiting Condition for Operation (LCO) 3.6.4.1 due to Zone II Secondary Containment Isolated from the Recirculation Plenum and Relaxed in support of outage activities

4/17/2013 00:02 – Entered OPDRV mode of operation, provisions of EGM 11-003 in effect

4/17/2013 to 5/17/2013 – Performed OPDRV activities in support of U216RIO

5/17/2013 22:00 – Cleared Unit 2 LCO 3.6.4.1

The station used the provisions of EGM 11-003, Revision 1 in order to perform the following U216RIO activities:

- Recirculation system drain and maintenance
- Reactor Water Clean Up (RWCU) system removal from service, maintenance, testing, and restoration
- Residual Heat Removal (RHR) system local leak rate test (LLRT), drain, maintenance, and testing
- Hydraulic Control Unit (HCU) replacement
- Local Power Range Monitor (LPRM) replacement
- Scram Discharge Volume (SDV) maintenance and testing
- Control Rod Drive (CRD) mechanism replacements
- Scram Pilot Solenoid Valve testing
- Reset of Reactor Scram
- Dynamic vent of CRD headers

CAUSE OF THE EVENT

Implementation of EGM 11-003, Revision 1 interim actions during the U216RIO was a planned activity. As such, no cause determination was performed on the events.

ANALYSIS/SAFETY SIGNIFICANCE

This event is reportable in accordance with 10 CFR 50.73(a)(2)(i)(B) as operations prohibited by SSES Unit 2 Technical Specification 3.6.4.1, which prohibits performing activities identified as OPDRVs in Mode 5 while secondary containment is inoperable.

With the exception noted below, OPDRVs discussed in this report were accomplished using interim actions provided by the NRC in EGM 11-003, Revision 1. In accordance with station procedures controlling OPDRVs (NDAP-QA-0326, OP-AD-325), Susquehanna adhered to the NRC plain language meaning of OPDRV activities that could potentially result in draining or siphoning the RPV water level below the top of the fuel. This included evolutions involving aligning and realigning plant systems prior to achieving steady-state water level control, without taking credit for mitigating measures. Susquehanna also met the requirements which specify the minimum makeup flow rate and water inventory. Further, an adequate defense in depth was maintained to minimize the potential for the release of fission products with secondary containment not operable. With the exception of TS 3.8.2, all other Mode 5 Technical Specifications requirements for OPDRV activities were followed. Since these compensatory measures were implemented and the exception of TS 3.8.2 was determined to be of low shutdown risk significance, an adequate level of safety was provided during the performance of the OPDRV activities described in this report.

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**NARRATIVE**

The exception of TS 3.8.2 was due to an unrecognized condition prohibited by the TS when more than one required AC power source was inoperable during OPDRV activities. Specifically, required emergency diesel generators were rendered inoperable by the failure of an electrical synchronizing switch. The duration of the exception was approximately 75 hours. Because the inoperable AC power sources were determined to have maintained their ability to perform their necessary shutdown risk function, the impact to OPDRV activities was determined to be of low shutdown risk significance. Details of the condition prohibited by TS 3.8.2 are planned to be reported in a separate LER.

**CORRECTIVE ACTIONS**

SSES will submit a license amendment following NRC approval of the Technical Specifications Task Force traveler associated with generic resolution of this issue within the time constraints given in EGM 11-003, Revision 1.

No regulatory commitments are associated with this report.

**ADDITIONAL INFORMATION**

Component Information: None

Previous Similar Events: None