



JUN 25 2013

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

**SUSQUEHANNA STEAM ELECTRIC STATION
20-DAY ANSWER IN RESPONSE TO SECTION V
OF NRC ORDER EA-13-109
PLA-7030**

**Docket No. 50-387
and No. 50-388**

- References:**
1. *NRC Order EA-13-109 entitled, "Issuance of Order to Modify Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions," dated June 6, 2013.*
 2. *PPL Letter (PLA-6982) entitled, "Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Reliable Hardened Containment Vents," dated February 28, 2013.*

On June 6, 2013, the Nuclear Regulatory Commission (NRC) issued an immediately effective order to all licensees that operate boiling water reactors (BWRs) with Mark I and Mark II containment designs, including PPL Susquehanna, LLC (PPL), entitled "Order to Modify Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation under Severe Accident Conditions" (EA-13-109) (Reference 1). Order EA-13-109 rescinds an order issued by the NRC on March 12, 2012 (EA-12-050) that required all BWRs with Mark I and Mark II containments to take certain actions to ensure the operability of reliable hardened vent systems to remove decay heat and maintain control of containment pressure following events that result in loss of active containment heat removal capability or prolonged loss of AC power.

Order EA-13-109 requires PPL to install hardened containment venting systems that can be maintained functional during severe accident conditions, i.e. following significant core damage. The substantive requirements are contained in Attachment 2 of the Order. The order includes two separate implementation phases. Phase 1 includes modifications to wetwell venting systems, while Phase 2 includes modifications to drywell venting systems or implementation of a reliable containment strategy that meets regulatory approval. PPL is required to submit an overall integrated plan describing how compliance with Phase 1 will be achieved to the NRC by June 30, 2014 and is required to complete full implementation of Phase 1 requirements no later than startup from the second refueling outage that begins after June 30, 2014, or June 30, 2018, whichever is sooner. Order EA-13-109 also requires PPL to submit an overall integrated plan

describing how compliance with Phase 2 will be achieved to the NRC by December 31, 2015 and full implementation of Phase 2 requirements must be complete no later than startup from the first refueling outage that begins after June 30, 2017, or June 30, 2019, whichever is sooner.

The NRC states in the Order that it anticipates issuing implementation guidance for Phase 1 by October 31, 2013, and for Phase 2 by April 30, 2015. Upon issuance of the implementation guidance, PPL understands that it will have twenty days to assess the impact of the guidance and notify the NRC of any challenges with implementation of the order in accordance with Paragraph IV.C of the Order.

Pursuant to 10 C.F.R. § 2.202(a)(2), PPL hereby submits its answer to the Order. PPL consents to Order EA-13-109 and does not request a hearing. However, because implementing guidance is not expected to be available until October 31, 2013, for Phase 1 and April 30, 2015, for Phase 2, there remain significant uncertainties about the scope of the work that will be required by Order EA-13-109. As a result, PPL is unable to state with certainty that it will be able to meet all of the specified compliance deadlines in the Order. As such, PPL's future responses may include requests for schedule relief as warranted by subsequent NRC requirements or implementing guidance or the results of engineering analyses not yet performed. Any such request would be submitted in accordance with the relaxation provisions in Section IV of the Order.

Because Order EA-12-050 is rescinded by Order EA-13-109, PPL understands that all implementation deadlines and submittal requirements for Order EA-12-050 are no longer in force. As such, PPL considers the integrated plan that was submitted to the NRC on February 28, 2013 (Reference 2) to be withdrawn, and no further action is required by PPL with respect to that submittal or any other requirement specific to Order EA-12-050.

There are no regulatory commitments contained in this letter.

If you have any questions or require additional information, please contact Mr. John L. Tripoli, Manager – Nuclear Regulatory Affairs (570) 542-3100.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 6/25/13

Sincerely,



T. S. Rausch

Copy: NRC Region I
Mr. P. W. Finney, NRC Sr. Resident Inspector
Ms. S. Perkins-Grew, NEI
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