

Timothy S. Rausch
Senior Vice President & Chief Nuclear Officer

PPL Susquehanna, LLC
769 Salem Boulevard
Berwick, PA 18603
Tel. 570.542.3345 Fax 570.542.1504
tsrausch@pplweb.com



AUG 26 2013

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

**SUSQUEHANNA STEAM ELECTRIC STATION
REQUEST FOR IMPLEMENTATION DATE
RELIEF IN RESPONSE TO MARCH 12, 2012
COMMISSION ORDER MODIFYING LICENSES
WITH REGARD TO REQUIREMENTS FOR
MITIGATION STRATEGIES FOR
BEYOND-DESIGN-BASIS EXTERNAL EVENTS
(NRC ORDER EA-12-049)
PLA-7072**

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

- References:*
1. *NRC Order Number EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, dated March 12, 2012*
 2. *NRC Interim Staff Guidance JLD-ISG-2012-01, Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, Revision 0, dated August 29, 2012*
 3. *NEI 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, Revision 0, dated August 2012*
 4. *PLA-6923, PPL Susquehanna's Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated October 28, 2012*
 5. *PLA-6981, PPL Susquehanna's Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 28, 2013*
 6. *NRC Order EA-13-109, Order to Modify Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Sever Accident Conditions, dated June 6, 2013*

On March 12, 2012, the Nuclear Regulatory Commission (NRC issued an order (Reference 1) to PPL Susquehanna, LLC (PPL). Reference 1 was immediately effective and directs PPL to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event

of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance (Reference 2) and an overall integrated plan pursuant to Section IV, Condition C. Reference 4 provided PPL's initial status report regarding Mitigation Strategies. Reference 5 provided PPL's overall integrated plan.

The purpose of this letter is to request relief for the final implementation date for PPL to fully comply with Reference 1, Section IV.A.2.

The Request for Relief described in this letter is based on NRC mandated changes to the Hardened Containment Vent System implementation dates that impact the Mitigation Strategy Overall Integrated Plan. Specifically, the change in implementation dates for the Hardened Containment Vent Order (NRC Order EA-12-050 was rescinded and superseded by NRC Order EA-13-109) impacts the Mitigation Strategy Overall Integrated Plan and implementation timeline. A description of the requested relief and the basis for the relief request is provided below.

NRC Order EA-12-049 requires implementation of Mitigation Strategies to include procedures, guidance, training, and acquisition, staging, or installing of equipment needed for the strategies.

Reference 5 provided PPL's response to the NRC Order EA-12-049. The cover letter identifies that delays in implementing the Hardened Containment Vent System as required by NRC Order EA-12-050 will also affect implementation of the Mitigation Strategies NRC Order EA-12-049 actions.

The Reference 5 enclosure describes PPL's Mitigation Strategies that are based on venting the containment using the Hardened Containment Vent System. It also describes that a modification is required to install a Hardened Containment Vent System (HCVS).

Thus PPL's response to NRC Order EA-12-049 response provided in Reference 5 was premised on installation and use of a Hardened Containment Vent System as required by NRC Order EA-12-050.

Upon issuance of NRC Order EA-13-109 (Reference 6), the NRC staff changed technical and schedule requirements applicable to the Hardened Containment Vent System and rescinded the requirements of the NRC Order EA-12-050.

As a result, full compliance to the Mitigation Strategies required by NRC Order EA-12-049 and described in Reference 5 for PPL Susquehanna Units 1 and 2 will not be achieved until compliance to NRC Order EA-13-109 is achieved. Relief/relaxation from the NRC Order EA-12-049 IV.A.2 requirements is therefore required.

PPL will be in compliance with the aspects of the Reference 5 Mitigation Strategies for Unit 1 and Unit 2 that do not rely upon a Hardened Containment Vent System per the original schedule, unless otherwise described.

This letter contains no new regulatory commitments. If you have any questions regarding this report, please contact Mr. John L. Tripoli at 570-542-3100.

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

Executed on: 8/26/13

Sincerely,



T. S. Rausch

Copy: NRC Region I

Mr. J. E. Greives, NRC Sr. Resident Inspector
Ms. Jessica A. Kratchman, NRR/JLD/PMB, NRC
Mr. J. A. Whited, NRC Project Manager
Mr. L. J. Winker, PA DEP/BRP