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MAR 1 9 2015

10 CFR 50.90 10 CFR 50, Appendix E

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

SUSQUEHANNA STEAM ELECTRIC STATION PROPOSED LICENSE AMENDMENT TO UNIT 1 FACILITY OPERATING LICENSE NPF-14 AND TO UNIT 2 FACILITY OPERATING LICENSE NPF-22 TO ADOPT EMERGENCY ACTION LEVEL SCHEME PURSUANT TO NEI 99-01, REVISION 6, "DEVELOPMENT OF EMERGENCY ACTION LEVELS FOR NON-PASSIVE REACTORS" PLA-7285

Docket Nos. 50-387 and 50-388 and 72-28

- References: 1. Letter from Mark Thaggard (NRC) to Susan Perkins-Grew, Nuclear Energy Institute (NEI) – U.S. Nuclear Regulatory Commission and Endorsement of NEI 99-01, Revision 6, November 2012, dated March 28, 2013
 - 2. NRC Regulatory Issue Summary (RIS) 2005-02, Revision 1, "Clarifying the Process for Making Emergency Plan Changes," dated August 19, 2011.
 - 3. J. A. Franke, PPL Susquehanna, LLC letter, PLA-7264, "Notification of Commitment Change," dated December 5, 2014.

In accordance with the provisions of 10 CFR 50.90, "Application for amendment of *license, construction permit, or early site permit,*" PPL Susquehanna, LLC (PPL) requests amendments to the licenses for the Susquehanna Steam Electric Station (SSES) Unit 1 and Unit 2.

Specifically, the proposed changes involve revising the Emergency Plan for the affected facilities to adopt the Nuclear Energy Institute's (NEI's) revised Emergency Action Level (EAL) scheme described in NEI 99-01, Revision 6, "Development of Emergency Action Levels for Non-Passive Reactors," which has been endorsed by the NRC as documented in NRC letter dated March 28, 2013 (Reference 1).

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10 CFR 50, Appendix E, Section IV.B.2 stipulates that a licensee desiring to change its entire EAL scheme shall submit an application for an amendment to its license and receive NRC approval before implementing the change. Regulatory Issue Summary (RIS) 2005-02, Revision 1 (Reference 2) also indicates that a revision to an entire EAL scheme to another NRC-endorsed EAL scheme, must be submitted for prior NRC approval as specified in Section IV.B of Appendix E to 10 CFR 50.

Therefore, pursuant to 10 CFR 50.90, PPL hereby requests NRC review and approval of revisions to Emergency Plan EALs for the SSES Unit 1 and Unit 2:

PPL's currently approved Emergency Plan EAL scheme is based on the guidance established in NEI 99-01, Revision 4, *"Methodology for Development of Emergency Action Levels."* PPL is proposing to adopt the EAL scheme based on the latest NRC-endorsed guidance, which are described in NEI 99-01, Revision 6.

Attachment 1 provides an evaluation of the proposed changes. Attachments 2 through 4 provide additional supporting information related to the SSES Emergency Plan. Attachments 2 through 4 include the following:

- EAL Comparison Matrix, Revision 0
- EAL Wallcharts
- EAL Classification Bases, EP-RM-004 (Mark-ups and a clean copy are included)

The proposed changes contained in this submittal have been reviewed by the Plant Operations Review Committee (PORC) and the Susquehanna Review Committee (SRC) in accordance with the requirement of the PPL Quality Assurance Program requirements.

PPL requests approval of the proposed changes by March 31, 2016, with a targeted implementation period within 90 days pending outage schedules and /or required training cycles with the final implementation date based on NRC Project Manager agreement prior to issuance of the amendments.

Pursuant to 10 CFR 50.91, "Notice for public comment; State consultation," paragraph (b), PPL is notifying the Commonwealth of Pennsylvania of this application for license amendments by transmitting a copy of this letter and it's supporting attachments to the designated state official.

This submittal will complete a regulatory commitment to submit an updated EAL scheme for NRC review (Reference 3). There are no new regulatory commitments contained in this submittal.

Should you have any questions regarding this submittal, please contact Mr. Jeff Grisewood, Manager – Nuclear Regulatory Affairs at (570) 542-1330.

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

Sincerely,

Timothy S. Rausch Senior Vice President and Chief Nuclear Officer

Attachments: 1. PPL Susquehanna, LLC Evaluation of the Proposed Change

- 2. EAL Comparison Matrix, Revision 0
- 3. EAL Wallcharts
- 4. EAL Classification Bases, EP-RM-004 (Mark-ups and a clean copy)
- Copy: w/ Attachments (CD copy)

NRC Region I

Mr. J. Greives, NRC Sr. Resident Inspector

Mr. J. Whited, NRC Project Manager

Mr. L. Winker, PA DEP/BRP

Mr. R. Janati, PA DEP/BR

Mr. A. Brinser, PEMA