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MAY 04 2015

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

10 CFR 50.90

**SUSQUEHANNA STEAM ELECTRIC STATION
PROPOSED AMENDMENT NO. 317 TO LICENSE
NPF-14 AND PROPOSED AMENDMENT NO. 289
TO LICENSE NPF-22: CONTENT OF THE NO
SIGNIFICANT HAZARD DETERMINATION DOES
NOT CONTAIN SECURITY-RELATED INFORMATION
PLA-7327**

**Docket Nos. 50-387
and 50-388**

Reference: PPL Letter (PLA-7169) (J. A. Franke) to NRC Document Control Desk, "Susquehanna Steam Electric Station Proposed Amendment No. 317 to License NPF-14 and Proposed Amendment No. 289 to License NPF-22: Changes to Cyber Security Implementation Schedule," dated December 2, 2014 (ML14336A246).

In the above reference, PPL Susquehanna, LLC (PPL) requested an amendment to the Susquehanna Steam Electric Station (SSES) Unit 1 Operating License (NPF-14) and SSES Unit 2 Operating License (NPF-22). The amendment proposed a change to the SSES Cyber Security Plan (CSP) Milestone 8 full implementation date as set forth in the SSES Cyber Security Plan Implementation Schedule. Enclosure 1 of the reference included PPL's determination that the proposed changes do not involve a significant hazards consideration. PPL requested that Enclosure 1, which contains security-related information, be withheld, in its entirety, from public disclosure in accordance with 10 CFR 2.390. Since a determination of no significant hazard is published in the Federal Register, and that portion of Enclosure 1 does not contain security-related information, PPL has determined that the no significant hazards consideration portion of Enclosure 1 does not need to be withheld in accordance with 10 CFR 2.390. The no significant hazards consideration is provided in the attachment to this letter for publication in the Federal Register.

This letter contains no new regulatory commitments.

If you should have any questions regarding this submittal, please contact Mr. Jeffery N Grisewood, (570) 542-1330.

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

Executed on: 5/4/2015



J. A. Franke

Attachment: No Significant Hazards Consideration

Copy: NRC Region I
Mr. J. E. Greives, NRC Sr. Resident Inspector
Mr. J. A. Whited, NRC Project Manager
Mr. L. J. Winker, PA DEP/BRP

Attachment to PLA-7327

No Significant Hazards Consideration

NO SIGNIFICANT HAZARDS CONSIDERATION

Following is the No Significant Hazards Consideration evaluation associated with PPL's request to extend the SSES Cyber Security Plan (CSP) Milestone 8 full implementation date as originally provided in PLA-7169 dated December 2, 2015.

PPL Susquehanna LLC (PPL) has evaluated whether or not a significant hazards consideration is involved with the proposed amendment(s) by focusing on the three standards set forth in 10CFR50.92, "Issuance of amendment," as discussed below:

1. Do the proposed changes involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The amendment proposes a change to the PPL Susquehanna LLC (PPL) Cyber Security Plan (CSP) Milestone 8 (M8) full implementation date as set forth in the PPL CSP implementation schedule. The revision of the full implementation date for the PPL CSP does not involve modifications to any safety-related structures, systems or components (SSCs). Rather, the implementation schedule provides a timetable for fully implementing the PPL CSP. The CSP describes how the requirements of 10 CFR 73.54 are to be implemented to identify, evaluate, and mitigate cyber-attacks up to and including the design basis cyber attack threat, thereby achieving high assurance that the facility's digital computer and communications systems and networks are protected from cyber-attacks. The revision of the PPL Cyber Security Plan implementation schedule will not alter previously evaluated design basis accident analysis assumptions, add any accident initiators, modify the function of the plant safety-related SSCs, or affect how any plant safety-related SSCs are operated, maintained, modified, tested, or inspected.

Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Do the proposed changes create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The implementation of the PPL CSP does not introduce new equipment that could create a new or different kind of accident, and no new equipment failure modes are created. No new accident scenarios, failure mechanisms, or limiting single failures are introduced as a result of this proposed amendment.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Do the proposed changes involve a significant reduction in a margin of safety?

Response: No

The margin of safety is associated with the confidence in the ability of the fission product barriers (i.e., fuel cladding, reactor coolant pressure boundary, and containment structure) to limit the level of radiation to the public. The proposed amendment does not alter the way any safety-related SSC functions and does not alter the way the plant is operated. The PPL CSP provides assurance that safety-related SSCs are protected from cyber-attacks. The proposed amendment does not introduce any new uncertainties or change any existing uncertainties associated with any safety limit. The proposed amendment has no effect on the structural integrity of the fuel cladding, reactor coolant pressure boundary, or containment structure. Based on the above considerations, the proposed amendment does not degrade the confidence in the ability of the fission product barriers to limit the level of radiation to the public.

Therefore the proposed change does not involve a reduction in a margin of safety.

Based on the above evaluations, PPL concludes that the proposed amendment(s) present no significant hazards under the standards set forth in 10CFR50.92(c) and, accordingly, a finding of “no significant hazards consideration” is justified.

Applicable Regulatory Requirements/Criteria

The PPL CSP and associated implementation schedule for SSES Units 1 and 2 were approved by the NRC on October 17, 2012 via Unit 1 License Amendment 258 and Unit 2 License Amendment 239. These license amendments approved the PPL CSP and associated implementation schedule, and revised Paragraph 2.D of the FOLs to provide a license condition to require PPL to fully implement and maintain in effect all provisions of the NRC-approved CSP. Any change to the NRC-approved CSP implementation schedule requires prior NRC approval pursuant to 10 CFR 50.90.

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission’s regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.