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

10 CFR 50.73

**SUSQUEHANNA STEAM ELECTRIC STATION
LICENSEE EVENT REPORT 50-388/2015-005-00
UNIT 2 LICENSE NO. NPF-22
PLA-7340**

Docket No. 50-388

Attached is Licensee Event Report (LER) 50-388/2015-005-00. 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. The provisions contained in NRC enforcement guidance memorandum (EGM) 11-003, Revision 2, "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 these OPDRVs. There were no actual consequences to the health and safety of the public as a result of this event.

This letter contains no new regulatory commitments.

John A. Franke For J. A. Franke

J. A. Franke

Attachment: LER 388/2015-005-00

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



LICENSEE EVENT REPORT (LER)

(See Page 2 for required number of digits/characters for each block)

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA, Privacy and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

1. FACILITY NAME Susquehanna Steam Electric Station, Unit 2	2. DOCKET NUMBER 05000388	3. PAGE 1 of 3
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4. TITLE Condition Prohibited by Technical Specifications Due to Implementation of Enforcement Guidance Memorandum (EGM) 11-003

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	14	2015	2015	- 005	00	06	10	2015	FACILITY NAME	DOCKET NUMBER 05000

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

LICENSEE CONTACT C. E. Manges, Jr., Senior Engineer – Nuclear Regulatory Affairs	TELEPHONE NUMBER (Include Area Code) 570 542 3089
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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

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

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

The condition reported by this Licensee Event Report (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 4/14/2015 and 5/16/2015, Susquehanna Steam Electric Station (SSES) 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 2 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**

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA, Privacy and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

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
		2015	- 005	- 00	

NARRATIVE

CONDITIONS PRIOR TO EVENT

Unit 2 – Mode 5, 0 percent Rated Thermal Power

EVENT DESCRIPTION

While in Mode 5, Refueling, OPDRVs were performed as part of the Unit 2 17th Refueling and Inspection Outage (U2 17 RIO) without an operable secondary containment. This event timeline is as follows:

- 04/14/2015 - Commenced OPDRV activity under the provisions of EGM 11-003, Revision 2.
- 4/14/2015 to 5/16/2015 - Performed OPDRV activities in support of U2 17th RIO.
- 5/17/2015 – Cleared Unit 2 LCO 3.6.4.1

The station used the provisions of EGM 11-003, Revision 2 to perform the following outage activities:

- Recirculation system maintenance
- Reactor Water Clean Up (RWCU) system maintenance
- Residual Heat Removal (RHR) system maintenance
- Hydraulic Control Unit (HCU) maintenance
- Local Power Range Monitor (LPRM) replacement
- Control Rod Drive (CRD) mechanism replacements

CAUSE OF EVENT

Implementation of EGM 11-003, Revision 2 interim actions during the U2 17th RIO 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 activities identified as OPDRVs in Mode 5 while secondary containment is inoperable.

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

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NARRATIVE

The OPDRV activities described in this report were accomplished using the interim actions provided by the NRC in EGM 11-003, Revision 2. In accordance with station procedures controlling OPDRVs, SSES adhered to the NRC plain language meaning of OPDRV activities that could potentially result in draining or siphoning the Reactor Pressure Vessel (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. SSES 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. Since these compensatory measures were implemented, an adequate level of safety was provided during the performance of the OPDRV activities described in this report.

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 2.

No regulatory commitments are associated with this report.

COMPONENT FAILURE INFORMATION

None

PREVIOUS SIMILAR EVENTS

LER 50-387/2014-006-00 (PLA-7185): Implementation of Enforcement Guidance Memorandum (EGM) 11-003, Revision 2

LER 50-388/2013-001-00 (PLA 7018): Implementation of Enforcement Guidance Memorandum (EGM) 11-003, Revision 1