



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION I
2100 RENAISSANCE BLVD., SUITE 100
KING OF PRUSSIA, PA 19406-2713

June 30, 2015

EA-15-022

Mr. Timothy S. Rausch
President and Chief Nuclear Officer
Susquehanna Nuclear, LLC
769 Salem Blvd - NUCSB3
Berwick, PA 18603-0467

SUBJECT: ERRATUM FOR THE FINAL SIGNIFICANCE DETERMINATION FOR A WHITE FINDING WITH ASSESSMENT FOLLOW-UP AND NOTICE OF VIOLATION [INSPECTION REPORT NO. 05000387/2015504 and 05000388/2015504] – SUSQUEHANNA STEAM ELECTRIC STATION UNITS 1 AND 2

Dear Mr. Rausch:

On June 22, 2015, the U.S. Nuclear Regulatory Commission (NRC) issued the Final Significance Determination for a White Finding with Assessment Follow-up and a Notice of Violation. The letter was publicly available under Agencywide Documents Access and Management System (ADAMS) Accession Number ML15173A297¹. After the final significance letter was issued, Susquehanna Nuclear (Susquehanna) identified that the information related to the NRC's assessment of Susquehanna's performance at the Susquehanna Steam Electric Station (SSES), Units 1 and Unit 2, as a result of the White finding, was inaccurate. Specifically, the letter incorrectly stated that as a result of the White finding, the NRC assessed SSES, Units 1 and 2, to be in the Regulatory Response column of the NRC Action Matrix, retroactive to the second calendar quarter of 2015. However, as a result of the White finding, SSES, Units 1 and 2, will be in the Regulatory Response column of the NRC Action Matrix, retroactive to the **first** calendar quarter of 2015.

This erratum encloses the cover letter which is being re-issued to correct the record. Please disregard the previously transmitted cover letter. We regret any inconvenience this error may have caused.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be made available electronically for public inspection in the NRC Public Document Room located at NRC Headquarters in Rockville, MD, and from the NRC's Agency-wide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

¹ Designation in parentheses refers to an Agency-wide Documents Access and Management System (ADAMS) accession number. Documents referenced in this letter are publicly-available using the accession number in ADAMS

T. Rausch

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Should you have any questions concerning this erratum, please contact Mr. Anthony Dimitriadis, Chief, Division of Reactor Safety, Plant Support Branch 1, in Region I, at (610) 337-6953.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel H. Dorman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Daniel H. Dorman
Regional Administrator

Docket Nos. 50-387 and 50-388
License Nos. NPF-14 and NPF-22

Enclosure: Erratum for the Final Significance Determination for a White Finding with Assessment Follow-up and Notice of Violation [Inspection Report No. 05000387/2015504 and 05000388/2015504] – Susquehanna Steam Electric Station Units 1 and 2

cc w/encl: Distribution via ListServ

T. Rausch

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Should you have any questions concerning this erratum, please contact Mr. Anthony Dimitriadis, Chief, Division of Reactor Safety, Plant Support Branch 1, in Region I, at (610) 337-6953.

Sincerely,

/RA/

Daniel H. Dorman
Regional Administrator

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ORIGINAL LETTER: ML15173A297

ERRATUM AND ENCLOSURE: ML15181A332

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OFFICE	RI/ORA	RI/DRP	RI/DRS	RI/DRP	RI/DRS
NAME	C Crisden/CJC*	F Bower/FLB*	A Dimitriadis/AD*	H Nieh/HKN*	R Lorson/RKL*
DATE	6/25/15	6/25/15	6/25/15	6/30/15	6/25/15
OFFICE	RI/ORA	RI/ORA	OE	RI/RA	
NAME	B Klukan/BMK*	B Bickett/BAB*	G Figueroa via email	D Dorman	
DATE	6/29/15	6/30/15	6/26/15	6/30/15	

* See previous concurrence page

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769 Salem Blvd - NUCSB3
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SUBJECT: FINAL SIGNIFICANCE DETERMINATION FOR A WHITE FINDING WITH ASSESSMENT FOLLOW-UP AND NOTICE OF VIOLATION [INSPECTION REPORT NO. 05000387/2015504 and 05000388/2015504] – SUSQUEHANNA STEAM ELECTRIC STATION UNITS 1 AND 2

Dear Mr. Rausch:

This letter provides you the final significance determination of the preliminary White finding discussed in the U.S. Nuclear Regulatory Commission (NRC) letter dated April 16, 2015, which also enclosed Inspection Report No. 05000387/2015503 and 05000388/2015503 (ML15105A471)². This letter also transmits the follow-up NRC assessment of Susquehanna Nuclear's³ (Susquehanna's) performance at the Susquehanna Steam Electric Station (SSES), which supplements the NRC annual assessment letter issued on March 4, 2015 (ML15062A232).

The finding was identified through an NRC Problem Identification and Resolution Sample Inspection at SSES to review Susquehanna's evaluation of a concern related to emergency action level (EAL) declaration timeliness associated with the fission product barrier degradation EALs. The finding, which is described in detail in Inspection Report No. 05000387/2015503 and 05000388/2015503, involved Susquehanna's incorrect implementation of the 15-minute assessment, classification, and declaration period for a potential loss of Reactor Coolant System (RCS) barrier EAL. Specifically, Susquehanna interpreted the 15-minute assessment, classification, and declaration clock to start when operator actions were, or were expected to be, unsuccessful in isolating an RCS leak rather than upon exceeding the EAL thresholds. Susquehanna's interpretation of the 15-minute assessment, classification, and declaration period potentially degraded their ability to make a timely Site Area Emergency declaration for one postulated scenario involving an unisolable primary coolant system leak outside of primary containment. Susquehanna entered the issue into its corrective action program and implemented compensatory measures to address the issue and ensure timeliness in making event declarations.

² Designation in parentheses refers to an Agency-wide Documents Access and Management System (ADAMS) accession number. Documents referenced in this letter are publicly-available using the accession number in ADAMS.

³ Effective June 1, 2015, PPL Corporation, LLC is no longer an NRC licensee. The new licensee is Susquehanna Nuclear, LLC.

In the April 16, 2015, letter transmitting the NRC preliminary determination and the inspection report, the NRC offered Susquehanna the option to attend a regulatory conference, to reply in writing to provide its position on the facts and assumptions the NRC used to arrive at the finding and its safety significance, or to accept the finding as characterized in the inspection report.

In a letter dated May 15, 2015, (ML15135A493), Susquehanna provided a written response to NRC's preliminary determination. In the response, Susquehanna acknowledged the finding, but stated that the training and programs that were already in place prior to the finding would have ensured that the impact of the deficiency would have remained relatively minor. In addition, Susquehanna noted that the finding is associated with only one accident scenario: a primary coolant system leak outside primary containment, and inside the secondary containment. In the response, Susquehanna also noted a corrective action taken in response to the finding. Specifically, Susquehanna revised the EAL basis to clearly state that for a potential loss of RCS, the assessment of EAL entry conditions commences immediately when the emergency thresholds are exceeded. A summary of Susquehanna's position as provided in its May 15, 2015, letter, the NRC's response to the points raised in Susquehanna's letter, and the details of the NRC's conclusion on the safety significance of this issue, are provided in Enclosure 1.

After careful consideration of the information developed during the inspection and the additional information provided in your letter dated May 15, 2015, the NRC has concluded that the finding is appropriately characterized as White, a finding of low to moderate safety significance. You have 30 calendar days from the date of this letter to appeal the staff's determination of significance for the identified White finding. Such appeals will be considered to have merit only if they meet the criteria given in the NRC Inspection Manual Chapter 0609, Attachment 2. An appeal must be sent in writing to the Regional Administrator, Region I, 2100 Renaissance Boulevard, King of Prussia, PA 19406.

The NRC has also determined that the finding is a violation of Title 10 of the Code of Federal Regulations (10 CFR) 50.54(q), "Condition of Licenses," as cited in the Notice of Violation (Notice) in Enclosure 2. The circumstances surrounding the violation were described in detail in Inspection Report No. 05000387/2015503 and 05000388/2015503. In accordance with the NRC Enforcement Policy, the Notice is considered escalated enforcement action because it is associated with a White finding. You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. If you have additional information that you believe the NRC should consider, you may provide it in your response to the Notice. The NRC review of your response to the Notice will also determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

With respect to the supplemental NRC assessment of Susquehanna's performance at SSES Units 1 and Unit 2, as a result of this White finding in the Emergency Preparedness Cornerstone, the NRC has assessed SSES Units 1 and 2 to be in the Regulatory Response column of the NRC Action Matrix, retroactive to the first calendar quarter of 2015. Therefore, we plan to conduct a supplemental inspection using Inspection Procedure 95001, "Supplemental for One or Two White Inputs in a Strategic Performance Area," when your staff notifies us of their readiness for this inspection. This inspection is conducted to provide assurance that the root cause and contributing causes of any performance issues are understood, the extent of condition is identified, and the corrective actions are sufficient to prevent recurrence.

T. Rausch

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In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosures, and your response will be made available electronically for public inspection in the NRC Public Document Room located at NRC Headquarters in Rockville, MD, and from the NRC's Agency-wide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> . To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

Should you have any questions regarding this matter, please contact Mr. Anthony Dimitriadis, Chief, Division of Reactor Safety, Plant Support Branch 1, in Region I, at (610) 337-6953.

Sincerely,

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Daniel H. Dorman
Regional Administrator

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Enclosures: As stated

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