



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

October 29, 2015

LICENSEE: Susquehanna Nuclear, LLC

FACILITY: Susquehanna Steam Electric Station, Units 1 and 2

SUBJECT: SUMMARY OF OCTOBER 21, 2015, MEETING WITH SUSQUEHANNA NUCLEAR, LLC ON THE TSTF-425 LICENSE AMENDMENT REQUEST FOR SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2 (CAC NOS. MF5151 AND MF5152)

Background

On October 21, 2015, a Category 1 public meeting was held between members of the U.S. Nuclear Regulatory Commission (NRC) staff and representatives of Susquehanna Nuclear, LLC (the licensee) by teleconference. The purpose of the meeting was to discuss a Draft Request for Additional Information (RAI) with Susquehanna Nuclear, LLC related to a license amendment request (LAR) submitted by letter dated October 27, 2014 (Agencywide Documents Access and Management System (ADAMS) Package Accession No. ML14317A052), requesting the adoption of Technical Specification Task Force Traveler (TSTF)-425, "Relocate Surveillance Frequencies to Licensee Control – RITSTF Initiative 5b," at the Susquehanna Steam Electric Station, Units 1 and 2.

The meeting notice and agenda, dated October 8, 2015, are available under ADAMS Accession No. ML15281A378 and are posted on the NRC's public Web page at <http://www.nrc.gov/reading-rm/adams.html>. Persons who do not have access to ADAMS or who encounter problems in accessing the meeting materials located in ADAMS should contact the NRC Public Document Room reference staff by telephone at 1-800-397-4209 or 301-415-4737, or by e-mail to PDR.Resource@nrc.gov.

The Draft RAI was sent to the licensee on October 15, 2015, by e-mail (ADAMS Accession No. ML15292A169), and is available under ADAMS Accession No. ML15292A178. A copy of RAI 10 is enclosed.

Meeting Summary

During the meeting, the licensee and NRC staff discussed the Draft RAI and the information the licensee intends to provide in response. The licensee asked clarifying questions of the NRC staff, specifically asking for a distinction between single and multiple actions as applicable to RAI 10, which concerned the interpretation of Supporting Requirement HR-A3 as found in the disposition to Facts and Observations (F&O) 7-4 provided in the licensee's LAR. The clarification of RAI 10 focused on whether or not the licensee could screen out multiple action failures when building its probabilistic risk assessment in support of TSTF-425 implementation. Common cause failure events may occur due to either single or multiple activities. The licensee stated that its previous response to RAI 8, submitted by letter dated September 21, 2015 (ADAMS Accession No. ML15265A347), may have included its disposition of some multiple

action failures in the disposition of single action failures. The NRC staff noted that this clarification should be incorporated in the response to RAI 10.

The licensee committed to respond to RAI 10 by November 13, 2015. The licensee should reference this public meeting summary when responding to the RAI. There were no regulatory decisions made at this meeting.

A list of the meeting attendees is enclosed. Members of the public were invited to attend the meeting, but there were no participants. No Public Meeting Feedback forms were received.

Please direct any inquiries to me at 301-415-4090 or Jeffrey.White@nrc.gov.



Jeffrey A. White, Project Manager
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-387 and 50-388

Enclosures:

1. List of Attendees
2. RAI 10

cc w/enclosures: Distribution via Listserv

LIST OF ATTENDEES

OCTOBER 21, 2015, MEETING WITH SUSQUEHANNA NUCLEAR, LLC

TSTF-425 LICENSE AMENDMENT REQUEST FOR

SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2

U.S. Nuclear Regulatory Commission

Douglas Broaddus, NRR/DORL

Stacey Rosenberg, NRR/DRA

Jeffrey Whited, NRR/DORL

Tanya Hood, NRR/DORL

Daniel O'Neal, NRR/DRA

Jonathan Evans, NRR/DRA

Susquehanna Nuclear, LLC

Brian Vresko, Plant Analysis, Talen Energy

Suzanne M. Skoras, Plant Analysis, Talen Energy

Jason W. Hartzell; Supv-Plant Analysis, Talen Energy

Christopher K. Hoffman; Mgr-Nuclear Fuels, Talen Energy

Richard W. McIntosh, Nuclear Regulatory Affairs, Talen Energy

Jason Jennings, Supv-Nuclear Regulatory Affairs, Talen Energy

Don Vanover, ERIN Engineering

Don Mcleod, ERIN Engineering

REQUEST FOR ADDITIONAL INFORMATION
OFFICE OF NUCLEAR REACTOR REGULATION
LICENSE AMENDMENT REQUEST TO ADOPT TSTF-425 TO RELOCATE SPECIFIC
SURVEILLANCE FREQUENCIES TO A LICENSEE-CONTROLLED PROGRAM
SUSQUEHANNA NUCLEAR, LLC
SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2
DOCKET NOS. 50-387 AND 50-388

By letter dated October 27, 2014,¹ as supplemented by letters dated July 2, 2015,² and September 21, 2015,³ Susquehanna Nuclear, LLC (the licensee), submitted a license amendment request for the Susquehanna Steam Electric Station, Units 1 and 2 (SSES). The proposed amendment would modify the SSES technical specifications by relocating specific surveillance frequencies to a licensee-controlled program with the implementation of Nuclear Energy Institute (NEI) 04-10, "Risk-Informed Technical Specifications Initiative 5b, Risk-Informed Method for Control of Surveillance Frequencies."⁴ To complete its review, the U.S. Nuclear Regulatory Commission (NRC) staff requests responses to the following questions.

Background

Regulatory Guide 1.200, Revision 2, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities,"⁵ Regulatory Position 4.2, "Licensee Submittal Documentation," discusses the staff's expectations of the licensee's documentation in order to demonstrate technical adequacy of its PRA. One such expectation is the discussion of the resolution to the Facts and Observations from the peer review team and justification that the disposition does not adversely impact the application.

In Request for Additional Information (RAI) 3, issued by letter dated May 22, 2015,⁶ the NRC staff requested clarification on the licensee's response to Fact and Observation (F&O) 7-4, related to Supporting Requirement (SR) HR-B2. In response to RAI 3, the licensee explained that the resolution of the F&O was related to SR HR-A3 and that the pre-initiator identification process would preclude the development of common mode misalignment events for like components in separate divisions.

¹ Agencywide Documents Access and Management System (ADAMS) Package Accession No. ML14317A052.

² ADAMS Accession No. ML15183A248.

³ ADAMS Accession No. ML15265A347.

⁴ ADAMS Accession No. ML071360456.

⁵ ADAMS Accession No. ML090410014.

⁶ ADAMS Accession No. ML15103A396.

In RAI 8, issued by letter dated August 24, 2015,⁷ the NRC staff requested that the licensee discuss the justification and conclusion on screening pre-initiator mode errors. The RAI also requested that the licensee discuss considerations and the bases for the inclusion or exclusion of modeling of common-mode errors in the probabilistic risk assessment (PRA).

The licensee's response to RAI 8, submitted by supplement dated September 21, 2015, states, in part, that:

Common mode events impacting redundant system trains or diverse systems were specifically treated in accordance with HR-A3. This SR requires the identification of work practices that *"involve a mechanism that simultaneously affects equipment in either different trains of a redundant system or diverse systems (e.g., use of common calibration equipment by the same crew on the same shift, a maintenance or test activity that requires realignment of an entire system (e.g., SLCS)."* The intent of the SR was viewed to focus on capturing single activities that impact redundant trains of a system or diverse systems, not multiple, separate activities that impact redundant or diverse systems, even if they are performed in an outage.

Issue

SR HR-A3 describes a mechanism or process and clarifies it by the examples. The examples are not exhaustive. Common cause failure events may occur due to either single or multiple activities. An example of pre-initiator multiple actions which could result in a common failure is the use of an incorrect procedure, which may be used at different times. Therefore, pre-initiator multiple activity human failure events which could be a common mode failure, whether or not the activities occur in an outage, cannot be screened out considering SR HR-A3. This may be relevant to equipment which follows staggered testing.

Additional Information Needed

10. Based on the above, address how you will consider the potential for multiple actions which could be a common mode failure (such as the use of a procedure) consistent with SR HR-A3, for the PRA model.

⁷ ADAMS Accession No. ML15209A974.

action failures in the disposition of single action failures. The NRC staff noted that this clarification should be incorporated in the response to RAI 10.

The licensee committed to respond to RAI 10 by November 13, 2015. The licensee should reference this public meeting summary when responding to the RAI. There were no regulatory decisions made at this meeting.

A list of the meeting attendees is enclosed. Members of the public were invited to attend the meeting, but there were no participants. No Public Meeting Feedback forms were received.

Please direct any inquiries to me at 301-415-4090 or Jeffrey.Whited@nrc.gov.

/RA/

Jeffrey A. Whited, Project Manager
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-387 and 50-388

Enclosures:

1. List of Attendees
2. RAI 10

cc w/enclosures: Distribution via Listserv

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JEvans, NRR

ADAMS Accession No.: ML15295A202

OFFICE	LPL1-2/PM	LPL1-2/LA	LPL1-2/BC	LPL1-2/PM
NAME	JWhited	LRonewicz	DBroaddus	JWhited
DATE	10/28/15	10/28/15	10/29/15	10/29/15

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