Jon A. Franke
Site Vice President

Susquehanna Nuclear, LLC
769 Salem Boulevard
Berwick, PA 18603
Tel. 570.542.2904 Fax 570.542.1504
Jon.Franke@TalenEnergy.com

TALEN ENERGY

MAY 10 2016

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

10 CFR 50.73

SUSQUEHANNA STEAM ELECTRIC STATION
LICENSEE EVENT REPORT 50-387/2016-006-00
UNIT 1 LICENSE NO. NPF-14 **Docket No. 50-387**
PLA-7461

Attached is Licensee Event Report (LER) 50-387/2016-006-00. 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 discretion 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 the NRC enforcement guidance memorandum (EGM) 11-003, Revision 3, "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 the specified OPDRV activities.

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.

J. A. Franke

Attachment: LER 50-387/2016-006-00

Copy: NRC Region I
Mr. J. E. Greives, NRC Sr. Resident Inspector
Ms. T. E. Hood, NRC Project Manager
Mr. M. Shields, PA DEP/BRP

NRC FORM 366 (11-2015) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB: NO. 3150-0104 EXPIRES: 10/31/2018

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.

LICENSEE EVENT REPORT (LER)

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

1. FACILITY NAME	2. DOCKET NUMBER	3. PAGE
Susquehanna Steam Electric Station Unit 1	05000387	1 of 3

4. TITLE

Implementation of Enforcement Guidance Memorandum (EGM) 11-003, Revision 3

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
										05000
03	16	2016	2016	- 006	- 00	05	10	2016	FACILITY NAME	DOCKET NUMBER
										05000

9. OPERATING MODE

5

10. POWER LEVEL

000

11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: *(Check all that apply)*

☐ 20.2201(b)	☐ 20.2203(a)(3)(i)	☐ 50.73(a)(2)(ii)(A)	☐ 50.73(a)(2)(viii)(A)
☐ 20.2201(d)	☐ 20.2203(a)(3)(ii)	☐ 50.73(a)(2)(ii)(B)	☐ 50.73(a)(2)(viii)(B)
☐ 20.2203(a)(1)	☐ 20.2203(a)(4)	☐ 50.73(a)(2)(iii)	☐ 50.73(a)(2)(ix)(A)
☐ 20.2203(a)(2)(i)	☐ 50.36(c)(1)(i)(A)	☐ 50.73(a)(2)(iv)(A)	☐ 50.73(a)(2)(x)
☐ 20.2203(a)(2)(ii)	☐ 50.36(c)(1)(ii)(A)	☐ 50.73(a)(2)(v)(A)	☐ 73.71(a)(4)
☐ 20.2203(a)(2)(iii)	☐ 50.36(c)(2)	☐ 50.73(a)(2)(v)(B)	☐ 73.71(a)(5)
☐ 20.2203(a)(2)(iv)	☐ 50.46(a)(3)(ii)	☐ 50.73(a)(2)(v)(C)	☐ 73.77(a)(1)
☐ 20.2203(a)(2)(v)	☐ 50.73(a)(2)(i)(A)	☐ 50.73(a)(2)(v)(D)	☐ 73.77(a)(2)(i)
☐ 20.2203(a)(2)(vi)	☒ 50.73(a)(2)(i)(B)	☐ 50.73(a)(2)(vii)	☐ 73.77(a)(2)(ii)
	☐ 50.73(a)(2)(i)(C)	☐ OTHER Specify in Abstract below or in NRC Form 366A	

12. LICENSEE CONTACT FOR THIS LER

LICENSEE CONTACT	TELEPHONE NUMER *(Include Area Code)*
M. Krick, Senior Engineer - Nuclear Regulatory Affairs	(570) 542-1818

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

☐ YES *(If yes, complete 15. EXPECTED SUBMISSION DATE)* ☒ NO

15. EXPECTED SUBMISSION DATE

MONTH	DAY	YEAR

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 3/16/2016 and 4/11/2016, Susquehanna Steam Electric Station (SSES) performed Operations with the Potential for Draining the Reactor Vessel (OPDRV) activities on Unit 1 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 3 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.

NRC FORM 366A (11-2015) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB: NO. 3150-0104 EXPIRES: 10/31/2018

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 NUMBER	3. LER NUMBER		
		YEAR	SEQUENTIAL NUMBER	REV NO.
Susquehanna Steam Electric Station, Unit 1	05000387	2016	- 006	- 00

NARRATIVE

CONDITIONS PRIOR TO EVENT

Unit 1 – Mode 5, 0 percent Rated Thermal Power

EVENT DESCRIPTION

While in Mode 5, Refueling, OPDRVs were performed as part of the Unit 1 19th Refueling and Inspection Outage (U1 19 RIO) without an operable secondary containment. This event timeline is as follows:

3/15/2016, 0300 – Operations entered Unit 1 Limiting Condition for Operations (LCO) 3.6.4.1 due to Zone I Secondary Containment isolated from the Recirculation Plenum and relaxed in support of outage activities.

3/16/2016, 0340 to 4/11/2016, 1230 – Station performed OPDRV activities under the provisions of EGM 11-003, Revision 3, in support of U1 19th RIO.

4/12/2016, 1700 – Operations cleared Unit 1 LCO 3.6.4.1

The station used the provisions of EGM 11-003, Revision 3 to perform the following outage activities:

- Recirculation system maintenance
- Reactor Water Cleanup (RWCU) system maintenance
- Residual Heat Removal (RHR) system maintenance
- Hydraulic Control Unit (HCU) and Control Rod Drive (CRD) system maintenance
- Local Power Range Monitor (LPRM) replacements
- Control Rod Drive (CRD) Mechanism replacements

CAUSE OF EVENT

Implementation of EGM 11-003, Revision 3, interim actions during the U1 19th RIO was a planned activity. As such, no cause determination was performed on the events.

NRC FORM 366A (11-2015) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB: NO. 3150-0104 EXPIRES: 10/31/2018

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.

LICENSEE EVENT REPORT (LER) CONTINUATION SHEET

1. FACILITY NAME	2. DOCKET NUMBER	3. LER NUMBER		
		YEAR	SEQUENTIAL NUMBER	REV NO.
Susquehanna Steam Electric Station, Unit 1	05000387	2016	- 006	- 00

NARRATIVE

ANALYSIS/SAFETY SIGNIFICANCE

This event is reportable in accordance with 10 CFR 50.73(a)(2)(i)(B) as operations prohibited by SSES Unit 1 TS 3.6.4.1, which prohibits activities identified as OPDRVs while secondary containment is inoperable.

The OPDRV activities described in this report were accomplished using the interim actions provided by the NRC in EGM 11-003, Revision 3. 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 (TSTF) traveler associated with generic resolution of this issue within the time constraints given in EGM 11-003, Revision 3.

No regulatory commitments are associated with this report.

COMPONENT FAILURE INFORMATION

None

PREVIOUS SIMILAR EVENTS

LER 50-388/2015-005-00 (PLA-7340): "Condition Prohibited by Technical Specification Due to Implementation of Enforcement Guidance Memorandum (EGM) 11-003," dated June 10, 2015.
LER 50-387/2014-006-00 (PLA-7185): "Implementation of Enforcement Guidance Memorandum (EGM) 11-003, Revision 2," dated June 12, 2014.
LER 50-388/2013-001-00 (PLA 7018): "Implementation of Enforcement Guidance Memorandum (EGM) 11-003, Revision 1," dated June 14, 2013.