



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

July 28, 2017

Mr. Brad Berryman
Site Vice President
Susquehanna Nuclear, LLC
769 Salem Boulevard
NUCSB3
Berwick, PA 18603-0467

SUBJECT: SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2 – ISSUANCE OF AMENDMENTS REVISING TECHNICAL SPECIFICATIONS TO ADOPT TSTF-522, REVISION 0 (CAC NOS. MF9154 AND MF9155)

Dear Mr. Berryman:

The U.S. Nuclear Regulatory Commission (NRC or the Commission) has issued the enclosed Amendment No. 268 to Renewed Facility Operating License No. NPF-14 and Amendment No. 250 to Renewed Facility Operating License No. NPF-22 for the Susquehanna Steam Electric Station, Units 1 and 2, respectively. These amendments consist of changes to the Technical Specifications in response to your application dated February 1, 2017,¹ as supplemented by letter dated May 17, 2017.²

These amendments approve adoption of NRC-approved Technical Specifications Task Force (TSTF) Improved Standard Technical Specifications Change Traveler TSTF-522, Revision 0, "Revise Ventilation System Surveillance Requirements to Operate For 10 Hours per Month," dated March 30, 2010.³

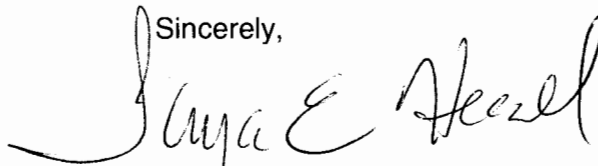
¹ Agencywide Documents Access and Management System (ADAMS) Accession No. ML17032A259

² ADAMS Accession No. ML17137A128

³ ADAMS Accession No. ML100890316

A copy of our related safety evaluation is also enclosed. Notice of Issuance will be included in the Commission's Biweekly *Federal Register* Notice.

Sincerely,

A handwritten signature in black ink, appearing to read "Tanya E. Hood". The signature is fluid and cursive, with a large initial "T" and "H".

Tanya E. Hood, Project Manager
Plant Licensing Branch I
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-387 and 50-388

Enclosures:

1. Amendment No. 268 to License
No. NPF-14
2. Amendment No. 250 to License
No. NPF-22
3. Safety Evaluation

cc w/enclosures: Distribution via Listserv



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

SUSQUEHANNA NUCLEAR, LLC

ALLEGHENY ELECTRIC COOPERATIVE, INC.

DOCKET NO. 50-387

SUSQUEHANNA STEAM ELECTRIC STATION, UNIT 1

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 268
Renewed License No. NPF-14

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for the amendment filed by Susquehanna Nuclear, LLC, dated February 1, 2017, as supplemented by letter dated May 17, 2017, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the regulations of the Commission;
 - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Renewed Facility Operating License No. NPF-14 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 268, and the Environmental Protection Plan contained in Appendix B are hereby incorporated in the license. Susquehanna Nuclear, LLC shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION



James G. Danna, Chief
Plant Licensing Branch I
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Facility Operating
License and Technical Specifications

Date of Issuance: July 28, 2017

ATTACHMENT TO LICENSE AMENDMENT NO. 268
SUSQUEHANNA STEAM ELECTRIC STATION, UNIT 1
RENEWED FACILITY OPERATING LICENSE NO. NPF-14
DOCKET NO. 50-387

Replace the following page of the Facility Operating License with the attached revised page. The revised page is identified by amendment number and contains a marginal line indicating the area of change.

REMOVE
Page 3

INSERT
Page 3

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE
TS / 3.6-44
TS / 3.7-8

INSERT
TS / 3.6-44
TS / 3.7-8

- (3) Susquehanna Nuclear, LLC, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed neutron sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;
 - (4) Susquehanna Nuclear, LLC, pursuant to the Act and 10 CFR Parts 30, 40, and 70 to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
 - (5) Susquehanna Nuclear, LLC, pursuant to the Act and 10 CFR Parts 30, 40, and 70 to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.
- C. This license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

Susquehanna Nuclear, LLC is authorized to operate the facility at reactor core power levels not in excess of 3952 megawatts thermal in accordance with the conditions specified herein. The preoperational tests, startup tests and other items identified in License Conditions 2.C.(36), 2.C.(37), 2.C.(38), and 2.C.(39) to this license shall be completed as specified.

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 268, and the Environmental Protection Plan contained in Appendix B are hereby incorporated in the license. Susquehanna Nuclear, LLC shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

For Surveillance Requirements (SRs) that are new in Amendment 178 to Facility Operating License No. NPF-14, the first performance is due at the end of the first surveillance interval that begins at implementation of Amendment 178. For SRs that existed prior to Amendment 178, including SRs with modified acceptance criteria and SRs whose frequency of performance is being extended, the first performance is due at the end of the first surveillance interval that begins on the date the Surveillance was last performed prior to implementation of Amendment 178.

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>F. Two SGT subsystems inoperable during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.</p>	<p>F.1 -----NOTE----- LCO 3.0.3 is not applicable. -----</p>	
	<p>Suspend movement of irradiated fuel assemblies in secondary containment.</p>	<p>Immediately</p>
	<p><u>AND</u></p>	
	<p>F.2 Suspend CORE ALTERATIONS.</p>	<p>Immediately</p>
	<p><u>AND</u></p>	
	<p>F.3 Initiate action to suspend OPDRVs.</p>	<p>Immediately</p>

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.6.4.3.1 Operate each SGT filter train for ≥ 15 continuous minutes with heaters operating.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.6.4.3.2 Perform required SGT filter testing in accordance with the Ventilation Filter Testing Program (VFTP).</p>	<p>In accordance with the VFTP</p>
<p>SR 3.6.4.3.3 Verify each SGT subsystem actuates on an actual or simulated initiation signal.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.6.4.3.4 Verify each SGT filter cooling bypass and outside air damper opens and the fan starts on high charcoal temperature.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>F. Two CREOAS subsystems inoperable during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.</p> <p><u>OR</u></p> <p>One or more CREOAS subsystems inoperable due to an inoperable CRE boundary during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.</p>	<p>-----NOTE----- LCO 3.0.3 is not applicable. -----</p> <p>F.1 Suspend movement of irradiated fuel assemblies in the secondary containment.</p> <p><u>AND</u></p> <p>F.2 Suspend CORE ALTERATIONS.</p> <p><u>AND</u></p> <p>F.3 Initiate action to suspend OPDRVs.</p>	<p>Immediately</p> <p>Immediately</p> <p>Immediately</p>

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.7.3.1 Operate each CREOAS filter train for ≥ 15 continuous minutes with the heaters operating.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.7.3.2 Perform required CREOAS filter testing in accordance with the Ventilation Filter Testing Program (VFTP).</p>	<p>In accordance with the VFTP</p>
<p>SR 3.7.3.3 Verify each CREOAS subsystem actuates on an actual or simulated initiation signal.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>

(continued)



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

SUSQUEHANNA NUCLEAR, LLC

ALLEGHENY ELECTRIC COOPERATIVE, INC.

DOCKET NO. 50-388

SUSQUEHANNA STEAM ELECTRIC STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 250
Renewed License No. NPF-22

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for the amendment filed by the Susquehanna Nuclear, LLC, dated February 1, 2017, as supplemented by letter dated May 17, 2017, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the regulations of the Commission;
 - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Renewed Facility Operating License No. NPF-22 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 250, and the Environmental Protection Plan contained in Appendix B are hereby incorporated in the license. Susquehanna Nuclear, LLC shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION



James G. Danna, Chief
Plant Licensing Branch I
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Facility Operating
License and Technical Specifications

Date of Issuance: July 28, 2017

ATTACHMENT TO LICENSE AMENDMENT NO. 250
SUSQUEHANNA STEAM ELECTRIC STATION, UNIT 2
RENEWED FACILITY OPERATING LICENSE NO. NPF-22
DOCKET NO. 50-388

Replace the following page of the Facility Operating License with the attached revised page. The revised page is identified by amendment number and contains a marginal line indicating the area of change.

REMOVE
Page 3

INSERT
Page 3

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE
TS / 3.6-44
TS / 3.7-8

INSERT
TS / 3.6-44
TS / 3.7-8

- (3) Susquehanna Nuclear, LLC, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed neutron sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;
- (4) Susquehanna Nuclear, LLC, pursuant to the Act and 10 CFR Parts 30, 40, and 70 to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
- (5) Susquehanna Nuclear, LLC, pursuant to the Act and 10 CFR Parts 30, 40, and 70 to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.

C. This license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

Susquehanna Nuclear, LLC is authorized to operate the facility at reactor core power levels not in excess of 3952 megawatts thermal in accordance with the conditions specified herein. The preoperational tests, startup tests and other items identified in License Conditions 2.C.(20), 2.C.(21), 2.C.(22), and 2.C.(23) to this license shall be completed as specified.

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 250, and the Environmental Protection Plan contained in Appendix B are hereby incorporated in the license. Susquehanna Nuclear, LLC shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

For Surveillance Requirements (SRs) that are new in Amendment 151 to Facility Operating License No. NPF-22, the first performance is due at the end of the first surveillance interval that begins at implementation of Amendment 151. For SRs that existed prior to Amendment 151, including SRs with modified acceptance criteria and SRs whose frequency of performance is being extended, the first performance is due at the end of the first surveillance interval that begins on the date the Surveillance was last performed prior to implementation of Amendment 151.

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
F. Two SGT subsystems inoperable during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.	F.1 -----NOTE----- LCO 3.0.3 is not applicable. -----	Immediately
	Suspend movement of irradiated fuel assemblies in secondary containment.	
	<u>AND</u>	
	F.2 Suspend CORE ALTERATIONS.	Immediately
	<u>AND</u>	
	F.3 Initiate action to suspend OPDRVs.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.6.4.3.1 Operate each SGT filter train \geq 15 continuous minutes with heaters operating.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.3.2 Perform required SGT filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.6.4.3.3 Verify each SGT subsystem actuates on an actual or simulated initiation signal.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.3.4 Verify each SGT filter cooling bypass and outside air damper opens and the fan starts on high charcoal temperature.	In accordance with the Surveillance Frequency Control Program

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>F. Two CREOAS subsystems inoperable during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.</p> <p>OR</p> <p>One or more CREOAS subsystems inoperable due to an inoperable CRE boundary during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.</p>	<p>-----NOTE----- LCO 3.0.3 is not applicable. -----</p>	<p>Immediately</p> <p>Immediately</p> <p>Immediately</p>
	<p>F.1 Suspend movement of irradiated fuel assemblies in the secondary containment.</p>	
	<p><u>AND</u></p> <p>F.2 Suspend CORE ALTERATIONS.</p>	
	<p><u>AND</u></p> <p>F.3 Initiate action to suspend OPDRVs.</p>	

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.7.3.1 Operate each CREOAS filter train for ≥ 15 continuous minutes with the heaters operating.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.7.3.2 Perform required CREOAS filter testing in accordance with the Ventilation Filter Testing Program (VFTP).</p>	<p>In accordance with the VFTP</p>
<p>SR 3.7.3.3 Verify each CREOAS subsystem actuates on an actual or simulated initiation signal.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>

(continued)



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 268 TO
RENEWED FACILITY OPERATING LICENSE NO. NPF-14
AND AMENDMENT NO. 250 TO
RENEWED FACILITY OPERATING LICENSE NO. NPF-22
SUSQUEHANNA NUCLEAR, LLC
ALLEGHENY ELECTRIC COOPERATIVE, INC.
SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2
DOCKET NOS. 50-387 AND 388

1.0 INTRODUCTION

By letter dated February 1, 2017,¹ as supplemented by letter dated May 17, 2017,² Susquehanna Nuclear, LLC (the licensee) requested changes to the Technical Specifications (TSs) for Susquehanna Steam Electric Station (SSES), Units 1 and 2. Specifically, the licensee requested to adopt U.S. Nuclear Regulatory Commission (NRC or the Commission)-approved Technical Specifications Task Force (TSTF) Standard Technical Specifications (STS) Change Traveler TSTF-522, "Revise Ventilation System Surveillance Requirements to Operate for 10 hours per Month," dated March 30, 2010.³

The supplemental letter dated May 17, 2017, provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the NRC staff's original proposed no significant hazards consideration determination as published in the *Federal Register* on April 11, 2017 (82 FR 17461).

The proposed change would revise surveillance requirements (SRs) that currently require operating the ventilation system for at least 10 continuous hours, with the heaters operating or operable, at a frequency controlled in accordance with the surveillance frequency program (SFCP). The SRs would be changed to require at least 15 continuous minutes of ventilation system operation with the heaters operating at a frequency controlled in accordance with the SFCP. Changes were proposed for TS 3.6.4.3, "Standby Gas Treatment (SGT) System," and TS 3.7.3, "Control Room Emergency Outside Air Supply (CREOAS) System," and in particular, SRs 3.6.4.3.1 and 3.7.3.1.

¹ Agencywide Documents Access and Management System (ADAMS) Accession No. ML17032A259

² ADAMS Accession No. ML17137A128

³ ADAMS Accession No. ML100890316

The licensee stated that the license amendment request is consistent with NRC-approved Traveler TSTF-522. The availability of this TS improvement was announced in the *Federal Register* on September 20, 2012 (77 FR 58421) as part of the consolidated line item improvement process.

2.0 REGULATORY EVALUATION

One of the reasons air filtration and adsorption systems are required at nuclear power plants is to lower the concentration of airborne radioactive material that may be released from the site to the environment due to a design-basis event. Lowering the concentration of airborne radioactive materials can mitigate doses to plant operators and members of the public in the event of a design-basis event. A typical system consists of ventilation ductwork, fans, dampers, valves, instrumentation, prefilters or demisters, high efficiency particulate air filters, heaters, and activated charcoal adsorbers. These systems are tested by operating the systems and monitoring the response of the overall system, as well as individual components. Laboratory tests of charcoal adsorbers are also performed to ensure the charcoal adsorbs an acceptable amount of radioactive gases.

The regulatory requirements for design and testing of these systems are contained in Title 10 of the *Code of Federal Regulations* (10 CFR) 50.67 and Part 100, as well as Part 50, Appendix A, "General Design Criteria for Nuclear Power Plants," General Design Criteria 19, 41, 42, 43, and 61.

Regulatory Guide (RG) 1.52, Revision 2, "Design, Testing, and Maintenance Criteria for Post Accident Engineered-Safety-Feature Atmosphere Cleanup System Air Filtration and Adsorption Units of Light-Water-Cooled Nuclear Power Plants,"⁴ was published in March 1978 to provide guidance and criteria acceptable to the NRC staff for licensees to implement the regulations in 10 CFR Part 50 related to air filtration and adsorption systems.

Regulatory Position 4.d of Revision 2 of RG 1.52 provides guidance that "Each ESF [engineered safety feature] atmosphere cleanup train should be operated at least 10 hours per month, with the heaters on (if so equipped), in order to reduce the buildup of moisture on the adsorbers and high efficiency particular air filters." The purpose of this guidance is to minimize the moisture content in the system and, thereby, enhance efficiency in the event the system is called upon to perform its design-basis function.

Subsequent to the issuance of the above guidance, the NRC staff determined that 10 continuous hours of system operation would dry out the charcoal adsorber for a brief period of time, but following heater deenergization, the level of moisture accumulation in adsorbers would rapidly return to the pre-test level. The NRC staff subsequently issued NRC Generic Letter (GL) 99-02: "Laboratory Testing of Nuclear-Grade Activated Charcoal,"⁵ and Errata.⁶ GL 99-02 requested licensees to confirm that their charcoal testing protocols accurately reflect the adsorber gaseous activity capture capability. GL 99-02 also requested the licensees to account for the effects of moisture accumulation in adsorbers.

⁴ ADAMS Accession No. ML003740139

⁵ ADAMS Accession No. ML082350935

⁶ ADAMS Accession No. ML031110094

The NRC staff updated RG 1.52 to include the new information.⁷ RG 1.52, Revision 3, Regulatory Position 6.1, states, "Each ESF atmosphere cleanup train should be operated continuously for at least 15 minutes each month, with the heaters on (if so equipped), to justify the operability of the system and all its components."

One of the reasons for the previous 10-hour requirement for ventilation system operation with heaters operating was to minimize the effects of moisture on the adsorbers' ability to capture gaseous activity. However, these effects are already accounted for in the Ventilation Filter Testing Program (VFTP) at each facility, as described below.

The NRC's regulatory requirements related to the content of the TSs are contained in 10 CFR 50.36. The regulations at 10 CFR 50.36 require that the TSs include items in the following categories: (1) safety limits, limiting safety systems settings, and limiting control settings; (2) limiting conditions for operation (LCOs); (3) SRs; (4) design features; and (5) administrative controls. SRs are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the LCOs will be met.

The NRC's guidance for the format and content of licensee TSs can be found in NUREG-1433, "Standard Technical Specifications General Electric Plants BWR/4."

3.0 TECHNICAL EVALUATION

SR 3.6.4.3.1 currently requires operating each SGT filter train for at least 10 continuous hours with heaters operating at a frequency controlled in accordance with the SFCP, and would be changed to require at least 15 continuous minutes of SGT filter train operation with heaters operating at a frequency controlled in accordance with the SFCP. SR 3.7.3.1 currently requires operating each CREOS filter train for at least 10 continuous hours with the heaters operable at a frequency controlled in accordance with the SFCP, and would be changed to require at least 15 continuous minutes of CREOS filter train operation with heaters operating at a frequency controlled in accordance with the SFCP.

The NRC staff evaluated the licensee's proposed change against the applicable regulatory guidance in RG 1.52, Revision 3, guidance in the STS as modified by TSTF-522, and the regulatory requirements of 10 CFR 50.36. The proposed change would require at least 15 minutes of system operation. The NRC staff found that the proposed change is consistent with guidance in RG 1.52, Revision 3, and the regulatory requirements for design and testing of these systems as contained in 10 CFR 50.67 and 10 CFR Part 100, as well as General Design Criteria 19, 41, 42, 43, and 61.

The proposed change adopted the TS format and content, to the extent practicable, contained in the changes made to NUREG-1433, "Standard Technical Specifications General Electric BWR/4 Plants," by TSTF-522. The NRC staff found that the proposed change is consistent with guidance in the STS, as modified by TSTF-522.

The NRC staff compared the proposed changes to the existing SRs, as well as the regulatory requirements of 10 CFR 50.36. The existing SRs provide assurance that the necessary quality of ventilation systems and components will be maintained and that the LCOs will be met.

⁷ ADAMS Accession No. ML011710176

The proposed changes reduce the amount of required system operational time from 10 hours to 15 minutes. The 10-hour operational requirement for heaters was based on using the SR to eliminate moisture in the adsorbers and thus ensure the adsorbers would capture gaseous activity. The effects of moisture on the adsorbers' ability to capture gaseous activity are now accounted for in the licensee's VFTP by performing testing in a manner to account for the effects of moisture on the adsorbers' ability to capture gaseous activity.

The VFTP requirements are contained in TS 5.5.7 and require testing at a specific temperature and relative humidity value to account for the effects of moisture. Since the SRs are no longer relied upon to ensure the effects of moisture on the adsorbers' ability to capture gaseous activity are accounted for, the 10-hour heater operational requirement is unnecessary. The NRC staff found that reducing the required minimum system operation time to 15 minutes, consistent with RG 1.52, Revision 3, in conjunction with the VFTP, is sufficient to justify operability of the system and all its components. The NRC staff found that the proposed SR meets the regulatory requirements of 10 CFR 50.36 because it provides assurance that the necessary quality of ventilation systems and components will be maintained and that the LCO will be met. Based on the above, the NRC staff determined that the TS SR changes identified above are acceptable.

The regulation at 10 CFR 50.36(a)(1) states, in part: "A summary statement of the bases or reasons for such specifications ... shall also be included in the application, but shall not become part of the technical specifications." The licensee may make changes to the TS Bases without prior NRC staff review and approval in accordance with the TS Bases Control Program for TS 5.5.10. Accordingly, along with the proposed TS changes, the licensee also submitted TS Bases changes corresponding to the proposed TS changes. The NRC staff determined that TS Bases changes are consistent with the proposed TS changes and provide the purpose for each requirement in the specification consistent with the Commission's Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors, dated July 22, 1993 (58 FR 39132).

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Pennsylvania State official was notified of the proposed issuance of the amendments on July 3, 2017. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and change surveillance requirements. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration on April 11, 2017 (82 FR 17461), and there has been no public comment on such finding. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

6.0 CONCLUSION

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

Principal Contributor: M. Hamm

Date: July 28, 2017

SUBJECT: SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2 – ISSUANCE OF AMENDMENTS REVISING TECHNICAL SPECIFICATIONS TO ADOPT TSTF-522, REVISION 0 (CAC NOS. MF9154 AND MF9155) DATED JULY 28, 2017

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ADAMS Accession Number: ML17187A297 *by e-mail **by memorandum

OFFICE	DORL/LPL1/PM	DORL/LPL1/LA	DSS/SBPB/BC*	DSS/STSB/BC(A)**
NAME	THood	LRonewicz	RDennig (GPurciarello for)	JWhitman
DATE	07/06/2017	07/26/2017	07/14/2017	06/20/2017
OFFICE	OGC –NLO w/comments	DORL/LPL1/BC	DORL/LPL1/PM	
NAME	STurk	JDanna	THood	
DATE	07/25/2017	07/28/2017	07/28/2017	

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