

Kevin Cimorelli
Site Vice President

Susquehanna Nuclear, LLC
769 Salem Boulevard
Berwick, PA 18603
Tel. 570.542.3795 Fax 570.542.1504
Kevin.Cimorelli@TalenEnergy.com



March 31, 2022

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

10 CFR 50.90

**SUSQUEHANNA STEAM ELECTRIC STATION
PROPOSED AMENDMENT TO LICENSES NPF-14
AND NPF-22: RELOCATE TECHNICAL
SPECIFICATION UNIT STAFF QUALIFICATION
REQUIREMENTS TO SUSQUEHANNA QUALITY
ASSURANCE PROGRAM
PLA-7883**

**Docket No. 50-387
and 50-388**

Reference: NRC Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," dated December 12, 1995 (ADAMS Accession No. ML031110271).

Pursuant to 10 CFR 50.90, Susquehanna Nuclear, LLC (Susquehanna), is submitting a request for an amendment to the Technical Specifications (TS) for the Susquehanna Steam Electric Station (SSES), Units 1 and 2, Facility Operating License numbers NPF-14 and NPF-22. The proposed amendment would modify TS 5.3.1, "Unit Staff Qualifications."

The proposed amendment would relocate the TS Unit Staff Qualification Requirements to the Susquehanna Quality Assurance Program, which is located in Sections 13.4 and 17.2 of the Susquehanna Updated Final Safety Analysis Report (FSAR), consistent with NRC Administrative Letter 95-06 (Reference 1) guidance.

Enclosure 1 provides a description and assessment of the proposed changes along with Susquehanna's determination that the proposed changes do not involve a significant hazard consideration. Enclosure 2 provides the existing TS pages marked to show the proposed changes. Enclosure 3 provides revised (clean) TS pages. Enclosure 4 provides an excerpt of FSAR Table 17.2-1, which already reproduces the TS requirements and is provided for information only.

While this request is submitted under neither exigent nor emergent circumstances, Susquehanna requests NRC approval of the proposed changes and issuance of the requested license

amendment by February 28, 2023. Once approved, the amendment shall be implemented within 60 days.

In accordance with 10 CFR 50.91, Susquehanna is providing a copy of this application, with enclosures, to the designated Commonwealth of Pennsylvania state official.

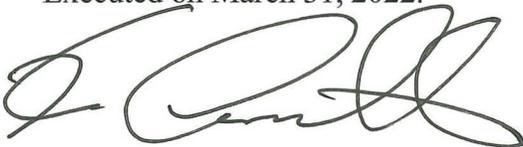
Both the Plant Operations Review Committee and the Nuclear Safety Review Board have reviewed the proposed changes.

There are no new or revised regulatory commitments contained in this submittal.

Should you have any questions regarding this submittal, please contact Ms. Melisa Krick, Manager – Nuclear Regulatory Affairs, at (570) 542-1818.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 31, 2022.

A handwritten signature in black ink, appearing to read 'K. Cimorelli', written over a horizontal line.

K. Cimorelli

Enclosures:

1. Description and Assessment
2. Marked-Up Technical Specification Pages
3. Revised (Clean) Technical Specification Pages
4. FSAR Table 17.2-1 Excerpt (Submitted for Information Only)

Copy: NRC Region I
Mr. C. Highley, NRC Sr. Resident Inspector
Ms. A. Klett, NRC Project Manager
Mr. M. Shields, PA DEP/BRP

Enclosure 1 to PLA-7883

Description and Assessment

1. SUMMARY DESCRIPTION
2. DETAILED DESCRIPTION
 - 2.1 Current Technical Specifications Requirements
 - 2.2 Reason for the Proposed Change
 - 2.3 Description of the Proposed Change
3. TECHNICAL EVALUATION
 - 3.1 Technical Analysis
 - 3.2 Conclusions
4. REGULATORY EVALUATION
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 - 4.3 No Significant Hazards Consideration Analysis
 - 4.4 Conclusions
5. ENVIRONMENTAL CONSIDERATION
6. REFERENCES

SUSQUEHANNA ASSESSMENT

1. Summary Description

Pursuant to 10 CFR 50.90, Susquehanna Nuclear, LLC (Susquehanna), is submitting a request for an amendment to the Technical Specifications (TS) for the Susquehanna Steam Electric Station (SSES), Units 1 and 2, Facility Operating License numbers NPF-14 and NPF-22. The proposed amendment would modify TS 5.3.1, "Unit Staff Qualifications." Specifically, the proposed amendment would permit the relocation of the Unit Staff Qualifications from the TS to the Susquehanna Quality Assurance Program (QAP), which is located in the Updated Final Safety Analysis Report (FSAR).

2. Detailed Description

2.1 Current Technical Specifications Requirements

TS 5.3.1 currently requires:

- 1) Licensed Operators and Shift Technical Advisors shall meet the supplemental requirements in Regulatory Guide (RG) 1.8, Revision 2 (Reference 1);
- 2) Supervisor - Health Physics shall meet or exceed the qualification of RG 1.8, September 1975 (Reference 2); and
- 3) All other members of the unit staff shall meet or exceed the minimum qualifications of American National Standards Institute (ANSI) Standard ANSI N18.1-1971 (Reference 3) for comparable positions.

2.2 Reason for the Proposed Change

The existing TS requirements for unit staff qualifications are based on NRC endorsed industry standards to ensure that a licensee's staff is appropriately qualified for their respective positions. Susquehanna desires to relocate these TS requirements for unit staff qualifications to the QAP to provide flexibility in adopting updated NRC-endorsed standards, and to eliminate the need for future amendment requests due only to upgrades to future revisions to the ANSI/ANS 3.1 standard, ANSI N18.1 Standard, or RG 1.8.

2.3 Description of the Proposed Change

TS 5.3.1 is revised to state, “Each member of the unit staff shall meet or exceed the minimum qualifications referenced for comparable positions as specified in the Susquehanna Steam Electric Station Quality Assurance Program.” The unit staff qualification requirements are already reproduced in FSAR Table 17.2-1.^{1,2}

3. Technical Evaluation

3.1 Technical Analysis

The proposed change will relocate the TS requirements for unit staff qualifications to the SSES QAP. This amendment will not change any current staff qualification requirements at SSES and is only an administrative TS change.

10 CFR 50.36(c)(5) requires TS to include items in the administrative controls category. Items include provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner. In 1995, the NRC acknowledged that many license amendments were being processed (e.g., organizational changes, position title changes, organization description changes, procedure review process) to relocate TS items to the licensee’s QAP. The items being relocated from TS did not satisfy the criteria of 10 CFR 50.36 for inclusion as a limiting condition for operation and were adequately controlled by other regulations and related licensee programs. The NRC issued Administrative Letter (AL) 95-06 (Reference 4), to address this issue and to provide additional guidance for relocating TS administrative controls to the licensee’s QAP. The proposed change is consistent with the guidance in AL 95-06 for relocating a licensee’s TS requirements to its QAP.

The unit staff qualifications do not satisfy the criteria of 10 CFR 50.36 for inclusion in the TS as a limiting condition for operation and are adequately controlled by other regulations and Susquehanna training programs. Susquehanna meets the training requirements specified in 10 CFR 55 and NUREG-1021 (Reference 5). In addition, on March 20, 1985, the NRC issued the Commission Policy Statement on Training and Qualification of Nuclear Power Plant Personnel (Reference 6), which endorsed the training accreditation program developed by the Institute of Nuclear Power Operations (INPO), in association with the National Academy for

¹ FSAR Table 17.2-1 requires that, for all positions not otherwise stated in the table, individuals meet the minimum qualification requirements in ANSI N18.1-1978 rather than the 1971 version stated in TS 5.3.1. The qualification requirements in ANSI N18.1-1978 meet or exceed the qualification requirements of ANSI N18.1-1971 for all unit staff positions as is required by TS 5.3.1. Therefore, no changes are required to the qualification requirements delineated in FSAR Table 17.2-1. To aid the NRC’s review, Page 1 of Table 17.2-1 is included in Enclosure 4 for information only.

² TS 5.3.1 currently uses the position title “supervisor – health physics”. In FSAR Table 17.2-1, this is equated to the position “Radiation Protection (Manager)” as described in Section 4.4.4 of ANSI N18.1-1971.

Nuclear Training (NANT). The NRC has documented discussion, approval, and acceptance of NANT guidelines in Regulatory Issue Summary 2001-01 (Reference 7). Susquehanna training programs employ the systems approach to training (SAT) required by 10 CFR 50.120 as embodied in the INPO NANT standards for plant staff personnel and their qualifications.

Consistent with the guidance in AL 95-06, future changes to the QAP staff qualification requirements will be evaluated under the 10 CFR 50.54(a) evaluation process.

3.2 Conclusions

The proposed change does not change current staff qualification requirements. The unit staff qualification requirements in the TS remain unchanged. Future changes to the QAP, as contained in the FSAR, are controlled by the 10 CFR 50.54(a) evaluation processes.

4. Regulatory Evaluation

4.1 Applicable Regulatory Requirements/Criteria

Title 10 Code of Federal Regulations (10 CFR) 50.36

10 CFR 50.36(c)(5) requires provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting to be included in the TS that are necessary to assure operation of the facility in a safe manner. The proposed change conforms to the 10 CFR 50.36(c)(5) requirements.

10 CFR 50.120

10 CFR 50.120 requires that each nuclear power plant licensee establish, implement, and maintain the training and qualification programs that are derived from a systems approach to training as defined in 10 CFR 55.4. The proposed change conforms to the 10 CFR 50.120 requirements.

10 CFR 55

10 CFR 55, Subpart D, "Applications," requires that operator license applications include information concerning an individual's education, experience, and other related matters to provide evidence and certification that the applicant has successfully completed the facility licensee's training program that is based on a systems approach to training. The proposed change conforms to the 10 CFR 55 requirements.

NUREG-1021

NUREG-1021 establishes the policies, procedures, and practices for examining licensees and applicants for reactor operator and senior reactor operator licenses at nuclear power reactor facilities under 10 CFR 55. The Susquehanna operator training program meets the current requirements of NANT Academy Document ACAD 10-001. The proposed change conforms to the NUREG-1021 requirements.

Regulatory Guide 1.8

RG 1.8 describes a method that the NRC staff finds acceptable for complying with the NRC's regulations regarding training and qualification of nuclear plant personnel. The proposed change maintains the current commitments to RG 1.8 (Revisions 1 and 2) as identified in the current TS staff qualification requirements and relocates the requirements to the QAP.

Administrative Letter 95-06

AL 95-06 discusses relocation of administrative controls related to quality assurance from the TS to licensee-controlled documents and programs. The proposed change to relocate TS unit staff qualifications is consistent with the guidance in AL 95-06, as discussed in Section 3.1.

Conclusion

Susquehanna has evaluated the proposed change against the applicable regulatory requirements and acceptance criteria. Susquehanna has determined that the applicable regulatory requirements continue to be met.

4.2 Precedent

The NRC has approved multiple similar amendment requests to allow relocation of unit staff qualification requirements from the TS to the QAP. Specifically, the NRC has issued such an amendment to Duke Energy Corporation (Duke) for the Brunswick, Catawba, McGuire, Oconee, Shearon Harris, and H. B. Robinson Plants in 2020 (Reference 8) and to Exelon for all its nuclear units in 2018 (Reference 9). As the proposed change is administrative in nature, the differences in design between SSES and the Duke and Exelon plants are irrelevant, and the NRC's prior approvals are applicable to Susquehanna's request for SSES.

4.3 No Significant Hazards Considerations Analysis

In accordance with the requirements of 10 CFR 50.90, Susquehanna Nuclear, LLC (Susquehanna), requests an amendment to the Technical Specifications (TS) for the Susquehanna Steam Electric Station (SSES), Units 1 and 2. The proposed amendment would

relocate the specific unit staff qualification requirements from TS 5.3.1 to the Quality Assurance Program (QAP), which is located within the SSES Updated Final Safety Analysis Report (FSAR).

Susquehanna has evaluated the proposed amendment against the standards in 10 CFR 50.92 and has determined that the operation of the SSES in accordance with the proposed amendment presents no significant hazards. Susquehanna's evaluation against each of the criteria in 10 CFR 50.92 follows.

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The proposed change is administrative in nature. The unit staff qualification requirements remain the same and are being relocated from the TS to the QAP. It does not make any physical changes to the plant, and does not alter accident analysis assumptions, add any initiators, or affect the function of plant systems or the manner in which systems are operated, maintained, tested, or inspected. The proposed change does not require any plant modifications which affect the performance capability of the structures, systems, and components relied upon to mitigate the consequences of postulated accidents.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed change is administrative in nature. The unit staff qualification requirements remain the same and are being relocated from the TS to the QAP. It does not involve changes to unit staff selection, qualification, and training programs. The proposed change does not impact the accident analysis. The proposed change does not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed), a change in the method of plant operation, or new operator actions. The proposed change does not introduce failure modes that could result in a new accident, and the change does not alter assumptions made in the safety analysis. The proposed change does not alter or prevent the ability of the operators to perform their intended functions to mitigate the consequences of an accident or event.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No

The proposed change is administrative in nature. The unit staff qualification requirements remain the same and are being relocated from the TS to the QAP. Margin of safety is associated with confidence in the ability of the fission product barriers (i.e., fuel cladding, reactor coolant system pressure boundary, and containment structure) to limit the level of radiation dose to the public. The proposed change does not impact operation of the plant or its response to transients or accidents. The proposed change does not involve a change in the method of plant operation, and no accident analyses will be affected by the proposed change. Safety analysis acceptance criteria are not affected by this proposed change.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above evaluation, Susquehanna concludes that the proposed amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and accordingly, a finding of “no significant hazards consideration” is justified.

4.4 Conclusions

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

5. Environmental Consideration

The proposed amendment is confined to changes to recordkeeping, reporting, or administrative procedures or requirement. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(10)(ii). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

6. References

1. NRC Regulatory Guide 1.8, "Qualification and Training of Personnel for Nuclear Power Plants," Revision 2, dated April 1987 (ADAMS Accession No. ML003739928).
2. NRC Regulatory Guide 1.8, "Personnel Selection and Training," Revision 1, dated September 1975 (ADAMS Accession No. ML12305A250).
3. ANSI Standard N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel," dated March 8, 1971.
4. NRC Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," dated December 12, 1995 (ADAMS Accession No. ML031110271).
5. NRC NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," Revision 12, dated September 2021 (ADAMS Accession No. ML21256A276).
6. NRC Policy Statement, "Commission Policy Statement on Training and Qualification of Nuclear Power Plant Personnel," dated March 20, 1985 (50 FR 11147).
7. NRC Regulatory Issue Summary 2001-01, "Eligibility of Operator License Applications," dated January 18, 2001 (ADAMS Accession No. ML003733003).
8. NRC letter to Duke Energy Corporation, "Issuance of Amendments to Relocate the Unit/Facility/Plant Staff Qualification Requirements to the Duke Energy Quality Assurance Program Description (EPID L-2019-LLA-0142)," dated August 12, 2020 (ADAMS Accession No. ML20083F927).
9. NRC letter to Exelon, "Issuance of Amendments to Relocate the Staff Qualification Requirements (EPID L-2018-LLA-0053)," dated August 2, 2018 (ADAMS Accession No. ML18206A282).

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Marked-Up Technical Specification Pages

Revised Technical Specifications Pages

Unit 1 TS Page 5.0-5

Unit 2 TS Page 5.0-5

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

- 5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications [referenced for comparable positions as specified in the Susquehanna Steam Electric Station Quality Assurance Program](#) ~~of ANSI N18.1-1971 for comparable positions except licensed operators and Shift Technical Advisors who shall meet the supplemental requirements in Reg Guide 1.8 Rev. 2 and the supervisor-health physics who shall meet or exceed the qualification of Regulatory Guide 1.8 September 1975.~~
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Enclosure 3 of PLA-7883

Revised (Clean) Technical Specification Pages

Revised Technical Specifications Pages

Unit 1 TS Page 5.0-5

Unit 2 TS Page 5.0-5

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Enclosure 4 of PLA-7883

FSAR Table 17.2-1 Excerpt

FSAR Table 17.2-1, Page 1 of 3

(Provided for Information Only)

NO CHANGES - INCLUDED FOR INFORMATION ONLY
SSES-FSAR

Table Rev. 69

TABLE 17.2-1 QUALITY ASSURANCE PROGRAM DESCRIPTION COMPLIANCE MATRIX			
NRC Reg. Guide	ANSI Standard	Subject	Clarifications & Exceptions
1.8, Rev. 4 (June 2019)	ANSI/ANS 3.1-2014	Personnel Selection & Training	Commitment to the following section of ANSI/ANS 3.1-2014, as modified by RG 1.8, Rev. 4: 4.2.4, “[Senior Manager] Engineering”
1.8, Rev. 3 (May 2000)	ANSI/ANS 3.1-1993	Personnel Selection & Training	Commitment to the following section of ANSI/ANS 3.1-1993, as modified by RG 1.8, Rev. 3: 4.3.7, “Quality Assurance (Manager)” The allowance contained in Regulatory Position 2.1.1 of RG 1.8, Rev. 3, has been expanded to include approval and documentation by the “responsible executive” in addition to the “plant manager”. The term “Quality Verification” is defined as “The act of reviewing, inspecting, testing, checking, auditing, or otherwise determining and documenting whether items, processes, services, or documents conform to specified requirements integral to the QA Program.” (LDCN 4894)
1.8, Rev. 2 (April 1987)	ANSI/ANS 3.1-1981	Personnel Selection & Training	Commitment to the following sections of ANSI/ANS 3.1-1981, as modified by RG 1.8, Rev. 2: 4.3.1.1, “Shift Supervisor”; 4.3.1.2, “Senior Operator”; 4.4.8, “Shift Technical Advisor”; 4.5.1.2, “Licensed Operators” 4.7.1, Supervisor of Organization Unit Responsible for Independent Review”; 4.7.2, [Independent Review] “Staff Specialist”.
1.8, Rev. 1-R (Sept. 1975)	ANSI N18.1-1971	Personnel Selection & Training	Commitment to the following section of ANSI N18.1-1971, as modified by RG 1.8, Rev. 1-R: 4.4.4, “Radiation Protection (Manager)”.
None	ANSI/ANS 3.1–1978	Personnel Selection & Training	1. Commitment to ANSI/ANS 3.1-1978 for all positions addressed therein, except those listed above. 2. SSES TS 5.2.2.f states that the operations manager <i>or the assistant operations manager</i> shall hold an SRO license.
1.28, Rev. 1	N45.2–1977	QA Program Requirements For Nuclear Facilities	Full compliance.
1.30, 8/72	N45.2.4–1972	Electrical Installation, Inspection & Testing	Commitment to the extent required by ANSI N18.7-1976. Calibration status of installed plant instrumentation is maintained via a computer information system.
1.33, Rev. 2	N18.7–1976	Administrative Controls & Operational QA	Full compliance except for: 1) Review frequency of procedures that comply with NRC Safety Evaluation dated July 27, 2001, performed for Vermont Yankee and frequency of program audits. See Section 17.2.2 for details. (LDCNs 3353 and 3466) 2) Allowance of up to 25% ‘Grace’ for audits except for audits controlled by 10CFR requirements. See Section 17.2.18 for details. (LDCN 5552) 3) Alternative requirements may be implemented in lieu of imposing a quality assurance program consistent with ANSI N45.2 for NVLAP & A2LA accredited commercial-grade calibration services. See Section 17.2.4 and 17.2.7 for details (LDCN 3957) 4) Procurement documents do not need to require a quality assurance program consistent with 10CFR50, Appendix B and ANSI N45.2-1971 and a pre-award evaluation and post-award audits are not required for work performed at the National Institute of Standards and Technology. See Section 17.2.4 & 17.2.7 for details. (LDCN 3957)
1.37, 3/73	N45.2.1–1973	Cleaning Fluid Systems & Components	Commitment to the extent required by ANSI N18.7–1976.