

**Britt T. McKinney**  
Vice President-Nuclear Site Operations

**PPL Susquehanna, LLC**  
769 Salem Boulevard  
Berwick, PA 18603  
Tel. 570.542.3149 Fax 570.542.1504  
btmckinney@pplweb.com



NOV 03 2004

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Mail Station OP1-17  
Washington, DC 20555

**SUSQUEHANNA STEAM ELECTRIC STATION  
ADDITIONAL CLARIFICATION ON PROPOSED  
RELIEF REQUEST NOS. 3RR-01, 3RR-02 AND 3RR-04  
TO THE THIRD 10-YEAR INSERVICE INSPECTION  
PROGRAM FOR SUSQUEHANNA SES UNITS 1 AND 2  
PLA-5826**

**Docket Nos. 50-387  
and 50-388**

- Reference: 1) Letter (PLA-5767) from B. L. Shriver (PPL) to NRC Document Control Desk titled "Response to Request for Additional Information from NRC on Proposed Relief Request Nos. 3RR-01, 3RR-02, and 3RR-04 to the Third 10-Year Inservice Inspection Program for Susquehanna SES Units 1 and 2," dated June 18, 2004.*
- 2) Letter (PLA-5804) from B. T. McKinney (PPL) to NRC Document Control Desk titled "Clarification to Responses provided for Relief Requests 3RR-01, 3RR-02, and 3RR-04 for Third 10-Year Inservice Inspection Program for Susquehanna SES Units 1 and 2 on June 18, 2004," dated September 16, 2004.*

The purpose of this letter is to provide additional clarification to PPL's responses provided in References 1 and 2, based on a telecon between PPL and NRC on September 29, 2004. The new information is presented after the NRC's original question and PPL's original response for ease of review.

**NRC Question No. 2 (for Relief Request 3RR-01):**

In PPL's Risk Informed Inservice Inspection (RI-ISI) program Report, Section 3.5, "Inspection Location Selection and NDE Selection under Additional Examinations," PPL states that "examinations performed that reveal flaws or relevant conditions exceeding the applicable acceptance standards shall be extended to include additional examination." Please provide a specific time line for all scenarios that would require an inspection sample increase. Also, be more specific as to the time frame of additional inspections that may become necessary if flaws are found in the first sample expansion. The Nuclear Regulatory Commission (NRC) staff expects that sample expansion examinations will be performed in the same time frame that is outlined in the ASME, Section XI IWB-2430.

A047

**Original PPL Response:**

In accordance with the Proposed Alternative in Relief Request 3RR-01, the RI-ISI program will perform any additional examinations required as a result of flaws or relevant conditions in accordance with Code Case N-578-1 Subarticle 2430. In addition to the provisions of this Subarticle, PPL will perform any examinations of either a first or second sample expansion during the same outage timeframe as when the original flaws or relevant conditions are found.

**Clarification to PPL's Original Response to Question No. 2 for Relief Request 3RR-01:**

PPL will perform any examinations of a first and, if necessary, a second sample expansion during the same outage timeframe as when the original flaws or relevant conditions are found.

**NRC Question No. 3 (for Relief Request 3RR-02):**

If the pumps are disassembled for maintenance or repair, does PPL intend to perform the required examination in accordance with the Code requirements?

**Original PPL Response:**

If welds or portions of welds are made accessible for inspection due to maintenance or repair activities, PPL will perform the required ASME Section XI examinations of those portions of welds made accessible through the disassembly activities. Additional disassembly will not be performed for the sole purpose of inspection.

**NRC Question No. 4 (for Relief Request 3RR-02):**

PPL does not provide an adequate explanation/description of its alternative in the "Proposed Alternative Examinations" section of its request. Please explain in clear and concise manner, the proposed alternative.

**Original PPL Response:**

In the event the subject welds, or portions of the welds, become accessible upon disassembly of any one (1) of the pumps in each of these systems (pump groups), the accessible portions of the welds will be surface examined from the inside surface to the maximum extent practicable and in accordance with the applicable Section XI requirements for surface examinations. In addition, all pumps will be subject to the visual examination requirements of Examination Category C-H, thus, providing assurance of pump structural integrity.

**Clarification to PPL's Original Responses to Question Nos. 3 and 4 for Relief Request 3RR-02:**

For the RHR and Core Spray pump casing welds, a surface or volumetric examination will be performed on the welds or portions of welds that are accessible. During normal maintenance activities, should a weld or portion of a weld become completely accessible (no restrictions), this weld or portion of this weld will have a surface or volumetric examination performed. Should access to these welds or portions be restricted so that examiners cannot adequately perform a surface or volumetric examination, a visual (VT-1) or remote visual (VT-1) examination will be performed, to the extent practicable, on these welds.

**NRC Question No. 1 (for Relief Request 3RR-04):**

Please provide a drawing that clearly shows interference that prevents a Code-required inspection from being performed (including dimensions).

**Original PPL Response:**

PPL Drawings C-198623, FF113010 sheet 5501, and FF113011 sheet 8101 are provided to illustrate the obstructions which preclude complete examination of the CRD housing welds discussed in Relief Request 3RR-04. (See Attachment A to Enclosure 3 of Reference 1).

**Clarification to PPL's Original Responses to Question No. 1 for Relief Request 3RR-04:**

This Relief Request proposes that a visual (VT-1) examination of the CRD welds be performed in lieu of a surface examination. As can be seen in the photographs provided in Reference 2, the area around the CRDs is congested with shoot-out steel, various cables and other structural supports. Some welds or portions of welds may not be accessible for a visual (VT-1) examination. If a visual examination can not be performed, a remote visual (VT-1) examination to the extent practicable will be performed. If a remote examination is not practicable, then a VT-2 visual examination will be performed.

There are no new commitments made in this letter.

If you have any questions, please contact Mr. C. T. Coddington at (610) 774-4019.

Sincerely,

A handwritten signature in black ink, appearing to read "B. T. McKinney". The signature is stylized with a large, looped "B" and a long, sweeping underline.

B. T. McKinney

Copy: NRC Region I

Mr. A. J. Blamey, NRC Sr. Resident Inspector

Mr. R. V. Guzman, NRC Project Manager

Mr. R. Janati, DEP/BRP