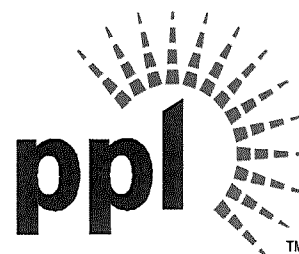


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FEB 28 2013

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-001

**SUSQUEHANNA STEAM ELECTRIC STATION
OVERALL INTEGRATED PLAN IN RESPONSE
TO MARCH 12, 2012 COMMISSION ORDER MODIFYING
LICENSES WITH REGARD TO REQUIREMENTS FOR
MITIGATION STRATEGIES FOR BEYOND DESIGN BASIS
EXTERNAL EVENTS (NRC ORDER EA-12-049)
PLA-6981**

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

- References:*
- 1) *NRC Order Number EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events dated March 12, 2012.*
 - 2) *NRC Interim Staff Guidance JLD-ISG-2012-01, "Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External events," Revision 0, dated August 29, 2012.*
 - 3) *NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide," Revision 0, dated August, 2012.*
 - 4) *PLA-6923: PPL Susquehanna, LLC's Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation strategies for Beyond-Design-Basis External events (Order Number EA-12-049), dated October 29, 2012.*

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued an order (Reference 1) to PPL Susquehanna, LLC (PPL). Reference 1 was immediately effective and directs Susquehanna Steam Electric Station to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 requires submission of an Overall Integrated Plan by February 28, 2013. The NRC Interim Staff Guidance (ISG) (Reference 2) was issued August 29, 2012 which

endorses industry guidance document NEI 12-06, Revision 0 (Reference 3) with clarifications and exceptions identified in Reference 2. Reference 3 provides direction regarding the content of this Overall Integrated Plan.

Reference 4 provided PPL's initial status report regarding mitigation strategies, as required by Reference 1.

The purpose of this letter is to provide the Overall Integrated Plan pursuant to Section IV, Condition C.1, of Reference 1. This letter confirms PPL has received Reference 2 and has an Overall Integrated Plan developed in accordance with the guidance for defining and deploying strategies that will enhance the ability to cope with conditions resulting from beyond-design-basis external events.

The information in Enclosure 1 provides the PPL Overall Integrated Plan for mitigation strategies pursuant to Reference 3. The Integrated Plan is based on conceptual design information. Final design details and associated procedure guidance, as well as any revisions to the information contained in Enclosure 1, will be provided in the 6-month Integrated Plan updates required by Reference 1.

Susquehanna's Hardened Containment Vent System Order EA-12-050 response will need to be revised if the NRC decides to impose any additional requirements like those described in SECY-12-0157, Options 2, 3, or 4, on Susquehanna,. The design information, milestones, and schedule dates for the compliance with Order EA-12-050 will need to be revised. Compliance with the existing Hardened Containment Vent System Order EA-12-050 deadlines will likely not be possible. Delays in implementing the Hardened Containment Vent System will also affect implementation of the Mitigation Strategies Order EA-12-049 actions. The SECY-12-0157 Options are titled: 1) Option 1: Reliable Hardened Vents (Status Quo or Base Case); 2) Option 2: Severe Accident Capable Venting System Order (without Filter); 3) Option 3: Filtered Severe Accident Venting System Order; and, 4) Option 4: Severe Accident Confinement Strategies.

If you have any questions regarding this submittal, please contact Mr. John L. Tripoli, Manager, Nuclear Regulatory Affairs, at (570) 542-3100.

This letter does not contain any new or revised regulatory commitments. The information contained in this submittal is based on conceptual level design information. The final design process will determine actual details such as - connection points, pipe routing, specific components, and electrical and pneumatic sizing and routing.

PPL requests that Enclosure 1 to this letter be withheld from public disclosure. The information represents Security-Related information as defined by 10 CFR 2.390.

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

Executed on 2/28, 2013.

T. S. Rausch

A handwritten signature in black ink, appearing to read 'T. S. Rausch', written in a cursive style.

Enclosure: 1) Overall Integrated Plan for Mitigation Strategies for Beyond
Design Bases External Events – Withhold From Public Disclosure in
Accordance with 10 CFR 2.390

Copy: Mr. P. W. Finney, NRC Sr. Resident Inspector
Mr. J. A. Whited, NRC Project Manager
Mr. L. J. Winker, PA DEP/BRP
Region I Administrator, NRC

Enclosure 1 to PLA-6981

**Overall Integrated Plan for Mitigation Strategies
for Beyond Design Bases External Events**
