Jon A. Franke
Site Vice President

PPL Susquehanna, LLC
769 Salem Boulevard
Berwick, PA 18603
Tel. 570.542.2904 Fax 570.542.1504
jfranke@pplweb.com

MAR 3 1 2014

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

SUSQUEHANNA STEAM ELECTRIC STATION
RESPONSE TO REQUEST FOR ADDITIONAL
INFORMATION ON FOURTH TEN-YEAR
INSERVICE TESTING INTERVAL
PROPOSED RELIEF REQUESTS
PLA-7148

Docket No 50-387
and No. 50-388

References: 1. PPL Letter (PLA-7055), "Proposed Relief Requests for the Fourth Ten-Year Inservice Testing Interval for Susquehanna Units 1 and 2," dated October 8, 2013 (Accession ML13282A554).

2. *PPL Letter (PLA-7120), "Revised Proposed Relief Requests for the Fourth Ten-Year Inservice Testing Interval for Susquehanna Units 1 and 2," dated December 12, 2013 (Accession ML13347B233).*

3. *NRC Letter, "Request for Additional Information Regarding Relief Requests for the Fourth 10-Year Inservice Testing Interval (TAC Nos. MF2905 Through MF2912 and MF2915)," dated January 31, 2014 (Accession ML14013A150).*

4. *PPL Letter (PLA-7142), "Response to Request for Additional Information on Fourth Ten-Year Inservice Testing Interval Proposed Relief Requests," dated February 26, 2014 (Accession ML14059A084).*

The purpose of this letter is for PPL Susquehanna, LLC (PPL) to provide clarification to the information previously provided in response to NRC question RAI-4 from Reference 3. The NRC requested this clarification in a discussion on March 6, 2014, at which time PPL agreed to provide the additional information. This response supports the current NRC review of the proposed alternative requests in References 1 and 2. The requested information is in Attachment 1 to this letter which replaces the original response to RAI-4 (Reference 4) in its entirety.

There are no new regulatory commitments associated with this response.

If you have any questions or require additional information, please contact Mr. Duane L. Filchner (570) 542-6501.

Sincerely,

J. A. Franke

Attachment 1: Response to Request for Additional Information

Copy: NRC Region I
Mr. J. Greives, NRC Sr. Resident Inspector
Mr. J. Whited, NRC Project Manager
Mr. L. Winker, PA DEP/BRP

Attachment 1 to PLA-7148

Response to Request for Additional Information

Response to Request for Additional Information

This additional information relates to PPL letters dated October 8,[1] and December 12, 2013[2] that submitted a group of relief requests for the Susquehanna Steam Electric Station, (SSES) Units 1 and 2. These relief requests are associated with the Fourth 10-Year Inservice Testing (IST) Interval. The additional information provided in this attachment relates specifically to the relief request 1RR-05, regarding alternative requirements for check valve testing frequency. The relief request 1RR-05 is an alternative to requirements of the American Society of Mechanical Engineers Operation and Maintenance Code (ASME OM Code), Section ISTC-3522(c), for four check valves (086018, 086118, 086241, and 086341). The NRC requested additional information (RAI) in a letter dated January 31, 2014.[3] PPL responded to the RAI in a letter dated February 26, 2014.[4] The NRC clarified the requested information with PPL in a discussion on March 6, 2014, at which time PPL agreed to supplement the information provided in response to the NRC question RAI-4. The balance of this attachment provides the requested information.

RAI-4:

The proposed alternative of this relief request is to verify the close function once during the operating fuel cycle instead of during refueling outages. This method has the potential of testing a valve at the end of a cycle and then again at the beginning of the next cycle. This could lead to a situation where the close verify test will not be performed for almost 4 years. Please verify that the maximum interval between tests will be less than 24 months.

PPL's Response:

Check valves 086241 (Emergency Service Water (ESW) Control Structure Chiller (CSC) Loop A Keepfill) and 086341 (ESW CSC Loop B Keepfill) are tested on a 24 month frequency. Each of these check valves have a separate surveillance test which accomplishes their required inservice testing. The requested alternative requires performance of the closure test at least once per operating cycle, and the scheduled test interval is required to be once every 24 months. This does not allow scheduling this test to be at the beginning of one operating cycle and at the end of the next operating cycle. Therefore, the maximum scheduled interval between tests will remain 24 months.

---

(1) PPL Letter (PLA-7055), "Proposed Relief Requests for the Fourth Ten-Year Inservice Testing Interval for Susquehanna Units 1 and 2," dated October 8, 2013 (Accession ML13282A554).
(2) PPL Letter (PLA-7120), "Revised Proposed Relief Requests for the Fourth Ten-Year Inservice Testing Interval for Susquehanna Units 1 and 2," dated December 12, 2013 (Accession ML13347B233).
(3) NRC Letter, "Request for Additional Information Regarding Relief Requests for the Fourth 10-Year Inservice Testing Interval (TAC Nos. MF2905 Through MF2912 and MF2915)," dated January 31, 2014 (Accession ML14013A150).
(4) PPL Letter (PLA-7142), "Response to Request for Additional Information on Fourth Ten-Year Inservice Testing Interval Proposed Relief Requests," dated February 26, 2014 (Accession ML14059A084).

Response to Request for Additional Information

Check valves 086018 (Emergency Condenser Water Circulating Pump A Discharge Check Valve) and 086118 (Emergency Condenser Water Circulating Pump B Discharge Check Valve) have an open safety function to provide a flow path from the emergency condenser water pump to the chiller condenser. These check valves are exercised tested open on a quarterly frequency.

The valves 086018 and 086118 will close to prevent backflow through an idle pump. The function is not required for safe shutdown or accident mitigation. The requested alternative requires performance of the closure test at least once per operating cycle, and the scheduled test interval is required to be once every 24 months. This does not allow scheduling this test to be at the beginning of one operating cycle and at the end of the next operating cycle. Therefore, the maximum scheduled interval between tests will remain 24 months.