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

**SUSQUEHANNA STEAM ELECTRIC STATION
REPLY TO A NOTICE OF VIOLATION
PLA-7212**

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

References: 1) NRC Letter, "Susquehanna Steam Electric Station – NRC Problem Identification and Resolution Inspection Report and Notice of Violation 05000387/2014009 and 05000388/2014009," dated August 1, 2014.

In accordance with 10 CFR 2.201, PPL Susquehanna, LLC (PPL) hereby submits the Reply to a Notice of Violation (NOV) for the Susquehanna Steam Electric Station (SSES), Unit 1 and Unit 2.

By Inspection Report (IR), dated August 1, 2014 (Reference 1), the Nuclear Regulatory Commission (NRC) identified that PPL is in violation of 10 CFR 50.54(q)(2) and 10 CFR 50.47(b)(4). The NRC has previously concluded there is a need for remote temperature monitoring of certain areas in the reactor building that have not previously been instrumented to provide that capability to emergency responders. The NRC concluded during Problem Identification and Resolution inspection activities that compliance was not restored in a timely manner.

PPL accepts the violation. The enclosure to this letter re-states the violation, and contains the response to the NOV. PPL intends to take all appropriate actions for the station to resolve the issue.

This letter contains new regulatory commitments and no revision to existing regulatory commitments.

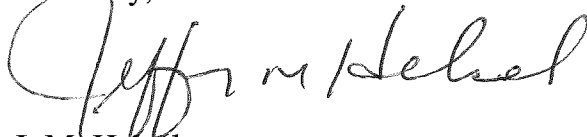
Regulatory Commitments	Completion Dates	Tracking Numbers
PPL will submit an updated EAL Scheme for NRC review, which removes the area temperatures from the EALs associated with the NOV in IR 05000387/388; 2014009.	December 31, 2014	DI-2014-27345

Regulatory Commitments	Completion Dates	Tracking Numbers
PPL will implement the updated EAL scheme; [e.g., compliance restored.]	June 30, 2015* <i>Based Upon NRC Approval (as stated in Enclosure Section 5)</i>	DI-2014-27346
Operations Directive to dispatch an operator to affected area(s) to determine area temperature, if a condition is suspected that could result in elevated Reactor Building temperatures for the following Unit 1 and 2 RB areas: 818 General Area 779 General Area 749 General Area 719 General Area 683 General Area 670 General Area 645 Core Spray Pump Room A 645 Core Spray Pump Room B 645 Reactor Building Sump Room	Completed (as stated in Enclosure Section 3)	Operations Directive 14-03, Revision 0
Revise Operations Directive to routinely assess on a shiftly basis, each of these nine areas listed above for high temperature conditions indicative of an unisolable leak, and document performance of assessments in operator rounds.	Completed (as stated in Enclosure Section 3)	Operations Directive 14-03, Revision 1

* Completion Date is a date considered to be as soon as practical after NRC approval.

Should you have any questions regarding this submittal, please contact Mr. John Tripoli, Manager – Nuclear Regulatory Affairs at (570) 542-3100, or David R. Lewis, Pillsbury Winthrop Shaw Pittman LLP (202) 663-8474.

Sincerely,



J. M. Helsel
Nuclear Plant Manager

Enclosure

Copy: NRC Region I

Mr. J. E. Greives, NRC Sr. Resident Inspector

Mr. J. A. Whited, NRC Project Manager

David R. Lewis, Counsel for PPL Susquehanna, LLC;

Pillsbury Winthrop Shaw Pittman LLP

Mr. D. L. Young, Nuclear Energy Institute (NEI)

Enclosure
PPL Susquehanna, LLC Reply to Notice of Violation

Restatement of the Violation⁽¹⁾

During an NRC inspection conducted on June 2, through June 20, a violation of NRC requirements was identified. The violation is listed below:

Enforcement. 10 CFR 50.54(q)(2) states, in part, that a licensee shall follow and maintain the effectiveness of an emergency plan that meets the requirements in Appendix E to this Part and, for power reactor licensees, the planning standards in 10 CFR 50.47(b). 10 CFR 50.47(b)(4) requires, in part, that a standard emergency classification and action level scheme is in use by the licensee, the bases of which include facility system and effluent parameters. Contrary to the above, since October 2003, PPL did not follow and maintain a standard emergency classification and action level scheme. Specifically, PPL did not take timely corrective actions to provide an adequate means to measure temperature in nine out of 21 areas, where reactor building temperature is considered for the fission product barrier degradation and is used for emergency classification. As a result, this deficiency adversely affected PPL's ability to classify an emergency such that a Site Area Emergency would be declared in a degraded manner.

PPL's corrective actions to correct this deficiency will not be complete until PPL implements NEI 99-01 Revision 6, which is subject to NRC review and approval and is projected to be completed in December 2015, nearly 4 years from the time of initial issue identification and nearly twelve years since the issue first existed.

Because PPL failed to restore compliance with NRC requirements within a reasonable time after the issue was discussed in a formal exit meeting on January 24, 2014 and documented in NRC Inspection Report 05000387; 388/2013005 on February 14, 2014, this violation is being treated as a cited violation, consistent with the NRC Enforcement Policy, Section 2.3.3, which states, in part, that a cited violation will be considered if the licensee fails to restore compliance within a reasonable time after a violation is identified. This is a violation of 10 CFR 50.54(q)(2) and 10 CFR 50.47(b)(4). (NOV 05000387; 388/2014009-04, Failure to Take Action to Restore Degraded Emergency Action Level Scheme).

⁽¹⁾ Notice of Violation (NOV) 05000387; 388/2014009-04 Failure to Take Action to Restore Degraded Emergency Action Level Scheme

Reply to the Violation

1. Admission or Denial of the Violation

PPL accepts the violation.

2. Reason(s) for the Violation

Through inspection activities, the NRC has concluded there is a need for remote temperature monitoring of certain areas in the reactor building that have not previously been instrumented to provide that capability to emergency responders. The NRC concluded during a Problem Identification and Resolution (PI&R) inspection activity that compliance was not restored in a timely manner.

Compensatory actions were not in place for the identified issue because PPL could find no requirements to install new dedicated monitoring instrumentation to implement the existing Emergency Operating Procedure (EO-000-104), or to require new instrumentation to operate the plants in connection with the current design and licensing basis. The current SSES Emergency Action Level (EAL) Scheme and Bases is based on NEI 99-01 Revision 4 guidance, which was endorsed by the NRC on October 8, 2003. On page 3.4, the guidance provides the following definition for Emergency Action Levels (EALs): "A predetermined, site-specific, observable threshold for a plant Initiating Condition that places the plant in a given emergency class. An EAL can be: an instrument reading; an equipment status indicator; a measurable parameter (onsite or offsite); a discrete observable event; results of analyses; entry into specific emergency operating procedures; or another phenomenon which, if occurs, indicates entry into a particular emergency class."

This definition makes it clear that EAL Initiating Conditions are not limited to instrument readings. In addition, there is nothing in the definition indicating that a measurable parameter (or even an instrument reading) must be remotely monitored. Because the EALs, however, list these temperatures used by the EOP, the NRC concludes there must be an instrumented basis for their use in the EALs. As long as there is no installed temperature monitoring capability for those temperatures listed in the EAL, the NRC concludes there would be a degraded ability to perform the emergency classifications.

3. Corrective Steps That Have Been Taken and the Results Achieved

In connection with the original question, PPL consulted with the Nuclear Energy Institute (NEI) on implementation of the NEI 99-01, Revision 4, and the currently endorsed Revision 6 EAL schemes in the industry. A submittal of a question about emergency preparedness (EPFAQ No. 2014-010), from NEI was added to the www.regulations.gov for a 30-day public comment period. PPL does not expect this

would resolve in time to be useful to address the cited violation actions, but the information may be helpful in directing future activities associated with implementing PPL's commitment regarding this issue.

PPL is planning to submit an updated SSES EAL scheme for NRC review, which is based on the NRC endorsed NEI 99-01, Revision 6 EAL scheme. The proposed update will be submitted by the end of 2014. PPL started tracking the station's effort to implement new station EALs based on NEI 99-01 Revision 6 on January 25, 2011. The NRC endorsed NEI 99-01, Revision 6 for use on March 28, 2013. PPL's budget request for this EAL project was approved January 10, 2014, with a contract in place and being worked since March 1, 2014. PPL formally is committing to this submittal in this letter, and is using the commitment management process to track implementing the new EAL scheme update for the station, accordingly.

PPL issued Operations Directive 14-03, Rev. 0 during the NRC Problem Identification and Resolution inspection, on June 13, 2014. This directive is shown as a completed commitment on the cover letter and the directive will dispatch an operator to the affected area(s) to determine the area temperature, if a condition is suspected to be present that could result in elevated reactor building temperatures for the following areas that do not contain temperature monitors.

Affected Areas (Unit 1 and Unit 2 RB)	818 General Area
	779 General Area
	749 General Area
	719 general Area
	683 General Area
	670 General Area
	645 CS Pump Room A
	645 CS Pump Room B
	645 RB Sump Room

In addition, the Operations Directive 14-03 has been revised to require that the operators routinely assess each of these nine areas for high temperature conditions, indicative of an unisolable leak, and document the performance of that assessment for these areas in operator rounds.⁽²⁾

⁽²⁾ As allowed by the directive, the documentation of the assessments to these areas will have initially been made in Control Room Unit Logs (eSOMS) on a shiftly basis, until Operator Round (eSOMS) modules are fully updated.

4. Corrective Steps That Will be Taken to Avoid Further Violations

The NRC Inspection Report states that local monitoring for any area temperatures listed in the EAL would not be acceptable to the NRC, for purposes of implementing the EALs. However, PPL must also consider that the associated Emergency Operating Procedure (EOP) must still monitor and control the secondary containment environment in the reactor building, as appropriate to confirm conditions of an unisolable leak. This can involve being in many areas of the reactor building that do not need remote temperature monitoring to be installed. Therefore, there are no adverse impacts from continuing to rely on this EOP as originally intended in the interim, and PPL must continue to use the EOP parameters as intended in the EOP, while seeking to resolve full compliance for this finding on the EAL.

PPL formally commits to submit an update to the station's EAL scheme by end of the year 2014. Because the update would remove the associated area temperatures from specific reference in the EALs, there is no actual consequence from not having the temperatures remotely monitored in the interim. Additionally, and as described in Section 3.0 above, PPL has since revised the Operations Directive 14-03. The revised directive requires routinely and that once per shift, the nine areas in Units 1 and 2 are assessed for high temperature conditions indicative of an unisolable leak. Performance of those assessments is documented in operator rounds.

5. Date When Full Compliance Will be Achieved

PPL will be in full compliance when the area temperatures used by the SSES EALs are no longer in the EALs, as approved by the NRC. For this NOV, full compliance will be achieved after NRC review and approval of PPL's planned submittal of Revision 6 of the EALs. PPL commits to an implementation date of June 30, 2015, based on an assumption that NRC review and approval of the submitted updated EAL scheme will occur as soon as practical, and prior to June 15, 2015. This approval will remove the area temperatures from the EALs that are associated with the Notice of Violation (NOV) in Inspection Report 05000387; 388/2014009.

Considering this, a return to full compliance will be as soon as practical, on or after NRC approval, when an upgrade to the SSES EAL using the NRC endorsed NEI 99-01 Revision 6 EAL scheme can be implemented. Subsequent to June 30, 2015, if the committed activity is not complete, PPL will track any associated activity to complete this commitment as a licensing action with the NRC Project Manager, as determined appropriate by the NRC, and continue to track this activity in the commitment management program, until resolved.