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**MAY 15 2015**

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

**SUSQUEHANNA STEAM ELECTRIC STATION  
RESPONSE TO PRELIMINARY WHITE FINDING IN  
NRC INSPECTION REPORT 05000387/2015503  
AND 05000388/2015503  
PLA-7332**

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

Reference: 1. *NRC Letter from Raymond Lorson to T. S. Rausch (PPL Susquehanna, LLC),  
"Susquehanna Steam Electric Station Units 1 and 2 - Problem Identification and  
Resolution Sample Inspection Report 05000387/2015503 and 05000388/2015503 with  
Preliminary White Finding," dated April 16, 2015.*

On April 16, 2015, PPL Susquehanna LLC (PPL) received the NRC Inspection Report (Reference 1) describing a preliminary white finding regarding timely event declaration for an unisolable primary system leak outside of primary containment. This type of leakage can cause high area radiation levels or high area temperatures in excess of Emergency Action Level (EAL) criteria. The inspection report provided PPL the option of responding to the preliminary white finding within 30 days. This letter provides that response. PPL acknowledges this performance deficiency. PPL recognizes that there were previous opportunities to identify and correct this issue.

A root cause determination and extent of condition determination are underway to identify the cause, validate any other aspects of the program that might be subject to similar deficiencies, and provide corrective actions. In immediate response to the notice of this proposed finding, the subject procedure was revised to clearly state that assessment of EAL entry commences immediately when one or more reactor building area radiation limits or area temperature limits are exceeded. The appropriate personnel were notified of this change.

While PPL acknowledges the significance of a white finding, the training and programs in place prior to this finding would ensure that the impact of this deficiency would remain relatively minor. The regulatory requirement is to classify the event within 15 minutes of receiving indication of entry-level conditions and to provide notification within the next 15 minutes. The subject of this preliminary white finding relates to one specific accident type - a primary coolant system leak outside primary containment, and inside the secondary containment. This performance deficiency was not noted in any other accident type. The potential delay previously allowed by our procedures relates to the time

allowed for the operators to attempt to isolate the leak prior to declaring an "unisolable primary system leak" under the EAL criteria following receipt of an alarm indicating leakage into secondary containment.

PPL regularly conducts drills in its simulator to measure the performance of its operating crews while mitigating the effects of a variety of accident scenarios. Our operators are trained to expeditiously isolate leaks per procedures, and are regularly evaluated in these efforts. Any crew failure to promptly attempt isolation during these exercises is corrected through our training program. Personnel are trained to promptly make an emergency declaration if EAL entry conditions are met.

PPL reviewed two years of history of operator performance in the simulator for this type of event. While our procedure allowed completion of isolation actions prior to emergency declaration, in the majority of the scenarios involving this type of event, the operators took the proper mitigating actions, correctly declared an emergency within 15 minutes of indication of the steam leak, and communicated with offsite agencies in less than 30 minutes. Only in cases where a crew failed to meet timeliness requirements and was subsequently coached or remediated was there any delay in the notification of the public beyond a few minutes. Completing these actions in a timely manner ensured protection of the public's health and safety.

In summary, although our procedure allowed determination of isolation capability before declaration of an emergency, it did not result in the organization being incapable of declaring a Site Area Emergency or General Emergency within 15 minutes. Consequently, the impact to the health and safety of the public was minimal.

There are no new or revised regulatory commitments contained in this letter. Please contact Jeff Grisewood, Regulatory Affairs Manager, at 570-542-1330 if there are any questions regarding this response.

Respectfully,



Jon A. Franke  
Site Vice President  
PPL Susquehanna

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