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JUL 16 2015

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

**SUSQUEHANNA STEAM ELECTRIC STATION
SUPPLEMENTAL INFORMATION TO LICENSE
AMENDMENT REQUEST FOR CHANGES IN RCS
PRESSURE AND TEMPERATURE (P/T) LIMITS
PLA-7360**

**Docket No. 50-387
and No. 50-388**

- References:*
1. Letter PLA-7181, "[Proposed Amendments to] Revise Technical Specification 3.4.10, RCS Pressure and Temperature (P/T) Limits," dated August 11, 2014 (Accession ML14223A780).
 2. Letter PLA-7299, "Response to Request for Additional Information on Technical Specification Changes to RCS Pressure and Temperature (P/T) Limits [TAC Nos. MF4597 and MF4598]," April 6, 2015 (ML15097A386).
 3. Federal Register 79 FR 70209; Docket NRC-2014-0252, dated November 25, 2014, [Basis for proposed no significant hazards consideration determination], (ML14317A552).

Susquehanna Nuclear, LLC is providing a revised evaluation of a no significant hazards consideration (NSHC) in the Attachment to this letter. This replaces information previously provided for the License Amendment Request (LAR) in Reference 1. The LAR is a request to revise Technical Specifications (TS) 3.4.10, RCS [Reactor Coolant System] Pressure and Temperature (P/T) Limits for the Susquehanna Steam Electric Station (SSES), Units 1 and 2. In Reference 2, additional information is provided with supporting analysis for making changes in TS Figures 3.4.10-1 through 3.4.10-3. The supporting analysis in Reference 2 defines new curves that are more limiting than those included with Reference 1. The supporting analysis is to be included as a basis for the determination of the NSHC in Reference 3.

Susquehanna Nuclear, LLC has determined that the supplemental information in this letter, and the supporting analysis provided in Reference 2, continue to support the prior determination of a NSHC. Furthermore, the additional information also does not affect the bases for concluding that neither an environmental impact statement nor an environmental assessment needs to be prepared in connection with the proposed amendment.

There are no new regulatory commitments associated with this submittal.

If you have any questions or require additional information, please contact Mr. Jeffery N. Grisewood (570) 542-1330.

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

Executed on: July 16, 2015

Sincerely,

A handwritten signature in black ink, appearing to be 'J. A. Franke', written over a horizontal line.

J. A. Franke

Attachment: Revised Information in the No Significant Hazards Consideration

Copy: NRC Region I
Mr. J. E. Greives, NRC Sr. Resident Inspector
Mr. J. A. Whited, NRC Project Manager
Mr. B. Fuller, PA DEP/BRP

Attachment to PLA-7360

**Revised Information in the
No Significant Hazards Consideration**

Revised Information in the No Significant Hazards Consideration**Susquehanna Nuclear, LLC,
Docket Nos. 50-387 and 50-388,
Susquehanna Steam Electric Station (SSES), Units 1 and 2**

Description of amendment request: The amendment proposes changes to SSES, Units 1 and 2, Technical Specification (TS) 3.4.10, "RCS [Reactor Coolant System] Pressure and Temperature (P/T) Limits," which includes revisions to the P/T Limits curves. The primary effect of the revision is to provide P/T Limits curves that extend into the vacuum region to mitigate the risk of a level transient during startup and shutdown, and to update the analysis supporting use of the new curves. Updated analysis will address considerations included in Regulatory Information Summary (RIS) 2014-11, "Information on Licensing Applications for Fracture Toughness Requirements for Ferritic Reactor Coolant Pressure Boundary Components," dated October 14, 2014. The new curves account for updated surveillance material and fluence data for the vessel beltline materials. References to the new updated analysis will be made in an associated TS Bases change when the new limits are approved for use in the TS.

Basis for proposed no significant hazards consideration determination: As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below, along with NRC edits in square brackets:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed changes request that the P/T limits curves in TS 3.4.10, "RCS Pressure and Temperature (P/T) Limits" be revised by extending each of the P/T Limits curves below 0 psig to allow operation with the RPV [reactor pressure vessel] at a vacuum. These changes update the analysis for ferritic RPV components, taking into account the considerations discussed by RIS 2014-11, and account for updated surveillance material and fluence data for the vessel beltline materials.

The P/T curves are used as operational limits during heatup or cooldown maneuvering, when pressure and temperature indications are monitored and compared to the applicable curve to determine that operation is within the allowable region. The P/T curves provide assurance that station operation is consistent with previously evaluated accidents.

Thus, the probability of an accident or the radiological consequences of an accident previously evaluated are not significantly increased.

Revised Information in the No Significant Hazards Consideration
(continued)

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed changes do not change the response of any plant equipment to transient conditions. The proposed changes do not introduce any new equipment, modes of system operation, or failure mechanisms.

Therefore, there are no new types of failures or new or different kinds of accidents or transients that could be created by these changes. The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

The consequences of a previously evaluated accident are not increased by these proposed changes, since the Loss of Coolant Accident analyzed in the FSAR [Final Safety Analysis Report] assumes a complete break of the reactor coolant pressure boundary. The proposed changes to the P/T Limits curves do not change this assumption.

Therefore, the proposed changes do not involve a significant reduction in a margin of safety.