

DRAFT

REQUEST FOR ADDITIONAL INFORMATION

OFFICE OF NUCLEAR REACTOR REGULATION

LICENSE AMENDMENT REQUEST TO ADOPT TSTF-425 TO RELOCATE SPECIFIC

SURVEILLANCE FREQUENCIES TO A LICENSEE-CONTROLLED PROGRAM

PPL SUSQUEHANNA, LLC

SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2

DOCKET NOS. 50-387 AND 50-388

By letter dated October 27, 2014,<sup>1</sup> as supplemented by letter dated July 2, 2015,<sup>2</sup> Susquehanna Nuclear, LLC (the licensee), submitted a license amendment request for the Susquehanna Steam Electric Station, Units 1 and 2 (SSES). The proposed amendment would modify the SSES technical specifications by relocating specific surveillance frequencies to a licensee-controlled program with the implementation of Nuclear Energy Institute (NEI) 04-10, "Risk-Informed Technical Specifications Initiative 5b, Risk-Informed Method for Control of Surveillance Frequencies."<sup>3</sup> To complete its review, the U.S. Nuclear Regulatory Commission staff requests responses to the following questions.

8. In the response to request for additional information (RAI) 3, regarding Supporting Requirement (SR) HR-B2, the licensee clarified that the intent of the fact and observation (F&O) resolution was to indicate that there is no longer any reliance on staggered testing/maintenance principles for screening purposes, and that the pre-initiator process was used for screening. However, the licensee did not explain the review of the screening of common mode errors to ensure that the use of staggered testing/maintenance principles was just a typographical error. The licensee's response also seems to suggest that all common mode errors were screened out. Discuss the justification and conclusions on screening pre-initiator common mode errors. Also, discuss the considerations and the bases for the inclusion or exclusion of modeling of common-mode errors in the probabilistic risk assessment (PRA).
9. The response to RAI 4 does not discuss reflecting the current plant configuration and operating experience when considering external events using NEI 04-01 guidance. (The response does confirm this for the internal events analysis.) Please explain whether evaluation of fire risk and other external events supporting this application reflects, or considers, the current plant configuration and operating experience.

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<sup>1</sup> Agencywide Documents Access and Management System (ADAMS) Package Accession No. ML14317A052.

<sup>2</sup> ADAMS Accession No. ML15183A248.

<sup>3</sup> ADAMS Accession No. ML071360456.