

SUSQUEHANNA NUCLEAR, LLC
REQUEST FOR PUBLIC MEETING

DISCUSSION OF ADDITIONAL PROPOSED CHANGES TO THE
SUSQUEHANNA STEAM ELECTRIC STATION (SSES)
EMERGENCY ACTION LEVEL (EAL) BASIS DOCUMENT SINCE
SUBMITTAL OF LICENSE AMENDMENT REQUEST TO ADOPT
NEI 99-01, REVISION 6, EMERGENCY ACTION LEVEL SCHEME
CHANGE (TAC NOS. MF6057 AND MF6058)

SUSQUEHANNA NUCLEAR, LLC

PUBLIC MEETING TO DISCUSS PROPOSED CHANGES TO THE SSES EMERGENCY PREPAREDNESS EAL BASIS DOCUMENT

Several proposed changes are being made to the SSES EAL Basis document as a result of the following:

- Corrective actions taken in response to the NRC EP White finding, and
- Susquehanna Nuclear, LLC, Emergency Operating Procedure (EOP) upgrade project to Revision 3 of the BWROG Emergency Procedure Guidelines (EPGs) /Severe Accident Guidelines (SAGs).

These proposed changes do not require prior NRC approval and were identified after SSES submitted a license amendment to the NRC to adopt the NEI 99-01, Rev. 6 EAL scheme change. (ML #15091A657)

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Section 3.1.1 – Added language directly from the NSIR/DPR-ISG-01 Interim Staff Guidance - EMERGENCY PLANNING FOR NUCLEAR POWER PLANTS Rev. 0 (November 2011) Section IV.H - Emergency Declaration Timeliness to provide complete classification timeliness guidance. This change was made as a result of corrective actions taken by Susquehanna Nuclear, LLC in response to the NRC EP White Finding.

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EAL SS6.1 – Updated the Heat Capacity Temperature Limit figure. This change was made as a result of the SSES EOP upgrade project to conform to Revision 3 of the generic BWROG EPGs/SAGs.

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EAL SU6.1 Bases – Added language currently in the NRC approved SSES EAL bases (NEI 99-01, Rev. 4 version) that clarifies that the EAL is not applicable if a manual scram is initiated and no RPS setpoint is exceeded. This change was made as a result of corrective actions taken by Susquehanna Nuclear, LLC, in response to the NRC EP White Finding.

Table F-1 Fission Product Barrier Threshold Matrix –
Revised PC Loss # 2 for PC Integrity or Bypass that
intentional Primary Containment venting can be
initiated via various EP-DS or EO procedures not just
EP-DS-004. This change was made as a result of the
SSES EOP upgrade project to conform to Revision 3
of the generic BWROG EPGs/SAGs.

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Fuel Clad Loss on Reactor Vessel Level Bases –
Updated the SAG entry conditions. This change
was made as part of the SSES EOP upgrade project
to conform to Revision 3 of the generic BWROG
EPGs/SAGs.

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Fuel Clad Loss Judgment Bases – Added language currently in the NRC approved SSES EAL bases (NEI 99-01 Rev. 4 version) that clarifies actions to take on loss of water level indication due to an electrical problem. This change was made as a result of corrective actions taken by Susquehanna Nuclear, LLC, in response to the NRC EP White Finding.

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Fuel Clad Potential Loss Judgment Bases – Added language currently in the NRC approved SSES EAL bases (NEI 99-01 Rev. 4 version) that clarifies actions to take on loss of water level indication due to an electrical problem. This change was made as a result of corrective actions taken by Susquehanna Nuclear, LLC, in response to the NRC EP White Finding.

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Reactor Coolant System (RCS) Loss # 2 on RCS Leak Rate Bases – Deleted the phrase “and keep them open” to eliminate the possibility of not declaring the barrier lost if all SRVs are not continuously kept open during emergency reactor pressure vessel (RPV) depressurization.

RCS Potential Loss for RCS leakage Bases –
Relocated the phrase (EAL “trigger”) and added the sentence “If it cannot be determined within 15 minutes of the EAL ‘Trigger’ that the leak is isolable and not the result of a condition previously described, the EAL shall be declared.” This change was made as a result of corrective actions taken in response to the NRC EP White Finding. No intent change.

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RCS Loss Judgment Bases – Added language currently in the NRC approved SSES EAL bases (NEI 99-01, Rev. 4 version) that clarifies actions to take on loss of water level indication due to an electrical problem. The change was made as a result of corrective actions taken by Susquehanna Nuclear, LLC, in response to the NRC EP White Finding.

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Primary Containment Potential Loss on Reactor Vessel Level Bases – Updated the SAG entry conditions. This change was made as a result of the SSES EOP upgrade project to conform to Revision 3 of the generic BWROG EPGs/SAGs.

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Primary Containment Loss for RCS leakage Bases –
Revised Max Safe language to align the Max Norm
language with respect to EAL “trigger” and declaration
requirements. This includes deleting the following
sentences:

- “If subsequent actions taken to isolate the leak are successful, the threshold for this EAL is still met and must be declared. Once leakage is isolated, downgrading the emergency may be appropriate.”

This change was made in response to the NRC EP
White Finding.

Primary Containment Loss for RCS leakage Bases –
Revised Max Safe language to match Max Norm
language.

- Added the sentence “If subsequent actions taken to isolate the leak are successful within the 15 minute classification period, this EAL should not be declared.”

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Primary Containment Potential Loss on Primary Containment Conditions Bases – Revised the procedure that defines deflagration (Hydrogen and Oxygen) limits as part of the SSES EOP upgrade project to conform to Revision 3 of the generic BWROG EPGs/SAGs.

Primary Containment Loss on PC Conditions –
Updated the Heat Capacity Temperature Limit
figure. This change was made as a result of the
SSES EOP upgrade project to conform to Revision 3
of the generic BWROG EPGs/SAGs.

Primary Containment Loss on PC Integrity or Bypass Bases – Revised to state that intentional Primary Containment venting can be initiated via various EP damage procedures or emergency operating procedures and not just EP-DS-004, “Primary Containment and RPV Venting.” This change was made as a result of the SSES EOP upgrade project to conform to Revision 3 of the generic BWROG EPGs/SAGs.