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TALEN ENERGY

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

10 CFR 50.4

SUSQUEHANNA STEAM ELECTRIC STATION
CORRECTION OF TECHNICAL SPECIFICATION
TYPOGRAPHICAL ERROR FOR TS 3.6.4.1
PLA-7733

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

References:

1) *Letter from J. A Whited, NRC, to J. A. Franke, Talen, "Susquehanna Steam Electric Station, Units 1 and 2- Issuance of Amendments RE: Adoption of TSTF-425 (CAC Nos. MF5151 and MF5152)," dated May 20, 2016, ADAMS Accession Number ML16005A234.*
2) *Proposed Guidance for Correction of Technical Specification Typographical Errors, SECY-96-238, dated November 19, 1996.*

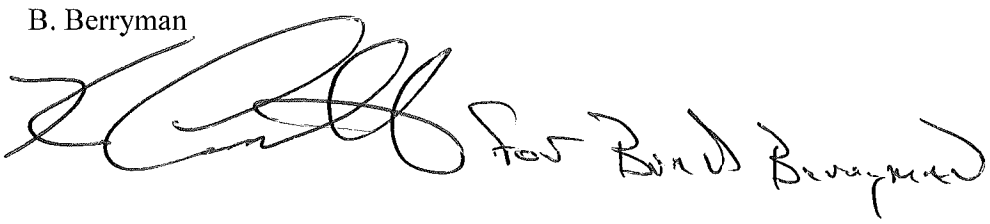
Susquehanna Nuclear, LLC is requesting correction for an inadvertent typographical error in Susquehanna Steam Electric Station (SSES) Unit 1 and Unit 2 Technical Specification (TS) 3.6.4.1, Secondary Containment. This error was introduced into the SSES Unit 1 and Unit 2 TS under Operating License NPF-14 Amendment 266 and Operating License NPF-22 Amendment 247, respectively (Reference 1). This letter requests the U. S. Nuclear Regulatory Commission's (NRC) approval of a correction to a typographical error.

This typographical error was not addressed in the notice to the public, not reviewed by the NRC, and falls within the scope of guidance provided in SECY-96-238 for correction (Reference 2).

Enclosure 1 of this letter describes the typographical error and required correction. Enclosures 2 and 3 provide the marked-up TS pages with the correction to the typographical error. Enclosures 4 and 5 provide the clean copies of the TS pages.

This letter contains no new regulatory commitments. Should you have any questions regarding this submittal, please contact Mr. Jason Jennings, Manager- Nuclear Regulatory Affairs at (570) 542-3155.

B. Berryman



Enclosure 1: Description of SSES Technical Specification Typographical Error
Enclosure 2: SSES Unit 1 TS 3.6.4.1 - Secondary Containment, Mark-up
Enclosure 3: SSES Unit 2 TS 3.6.4.1 - Secondary Containment, Mark-up
Enclosure 4: SSES Unit 1 TS 3.6.4.1 - Secondary Containment, Clean Copy
Enclosure 5: SSES Unit 2 TS 3.6.4.1 - Secondary Containment, Clean Copy

Copy: NRC Region I
Ms. T. E. Hood, NRC Project Manager
Ms. L. H. Micewski, NRC Sr. Resident Inspector
Mr. M. Shields, PA DEP/BRP

Enclosure 1:

Description of SSES
Technical Specification Typographical Error

Description of Technical Specification Typographical Error

1. Requested Action

   Consistent with the information contained in SECY-96-238, *Proposed Guidance for Correction of Technical Specification Typographical Errors* (Reference 12), Susquehanna Nuclear, LLC is requesting correction for an inadvertent typographical error in Susquehanna Steam Electric Station (SSES) Unit 1 and Unit 2 Technical Specification (TS) 3.6.4.1, Secondary Containment. This error was introduced into the SSES Unit 1 and Unit 2 TS under Amendment 266 and Amendment 247 (Reference 6), respectively. These errors remained uncorrected in Operating License NPF-14 Amendment 267 (Reference 9) and Amendment 270 (Reference 11), and Operating License NPF-22 Amendment 249 (Reference 9) and Amendment 252 (Reference 11).

2. Typographical Error

   The typographical error was introduced into the SSES Unit 1 and Unit 2 TS during implementation of the Operating License NPF-14 Amendment 266 and Operating License NPF-22 Amendment 247 (Reference 6). The following describes the specific errors and corrections.

   Error Location: Unit 1 TS page TS / 3.6-37 and Unit 2 TS page TS / 3.6-37

   SSES submitted a License Amendment Request to the NRC to adopt TSTF-425 which would modify the TS by relocating specific surveillance frequencies to a licensee-controlled program (References 1 through 5). This request, in part, resulted in Unit 1 and Unit 2 TS 3.6.4.1 replacing the specified frequency of Surveillance Requirement (SR) 3.6.4.1.4 and 3.6.4.1.5 with "In accordance with the Surveillance Frequency Control Program." During the mark-up process for the TS change, the removal of the frequency notes associated with SR 3.6.4.1.4 and 3.6.4.1.5 was missed. Each frequency note states to "Test each configuration at least one time every 60 months." Contrary to the intent of TSTF-425, these frequency notes restrict the licensee from independently managing the frequency of the associated surveillance.

   SR 3.6.4.1.4 and 3.6.4.1.5 frequency notes should be deleted resulting in the SR frequency being fully managed by the licensee-maintained Surveillance Frequency Control Program as approved by the NRC for SSES (Reference 6).

   This error was not noticed by the public nor approved by the NRC during review and approval of Operating License NPF-14 Amendments 266, 267, and 270 and Operating License NPF-22 Amendments 247, 249, and 252. Enclosures 2 and 3 provide the marked-up TS pages with the correction to the typographical error. Enclosures 4 and 5 provide the clean copies of the TS pages.

3. Applicability of SECY 96-238

   SECY 96-238 (SECY) (Reference 12) provides guidance to correct inadvertent typographical errors in the TS pages. The SECY allows for the use of an administrative letter to correct a typographical error upon meeting two requirements: 1) the error must have occurred in a specific license amendment; and 2) the error was not reviewed as part of the license amendment.

SSES has determined that the errors in Unit 1 and Unit 2 TS 3.6.4.1 were introduced under Amendment 266 and Amendment 247, respectively. These errors remained uncorrected in Operating License NPF-14 Amendment 267 and Amendment 270, and Operating License NPF-22 Amendment 249 and Amendment 252. Therefore, the first requirement is met.

When Operating License NPF-14 Amendment 266 and Operating License NPF-22 Amendment 247 were submitted for approval, the changes identified for the adoption of TSTF-425 did not identify any required change to the SR 3.6.4.1.4 and 3.6.4.1.5 frequency notes. These errors remained unidentified in Operating License NPF-14 Amendment 267 and Amendment 270, and Operating License NPF-22 Amendment 249 and Amendment 252. As such, the required change to the SR 3.6.4.1.4 and 3.6.4.1.5 frequency notes was not the subject of NRC review in the License Amendment Requests submitted under References 1 through 5, 7, 8, and 10.

Based on meeting both requirements for SECY 96-238, the use of this administrative letter to correct the identified typographical error in SSES Units 1 and 2 TS 3.6.4.1 is appropriate.

4. References

1) PPL Letter (PLA-7119), "Susquehanna Steam Electric Station Amendment Request No. 315 to License NPF-14 and Amendment Request No. 287 to License No. NPF-22: Adoption of Technical Specification Task Force Traveler TSTF-425, Revision 3, 'Relocate Surveillance Frequencies to Licensee Control--Risk Informed Technical Specification Task Force (RITSTF) Initiative 5'," dated October 27, 2014, ADAMS Accession Number ML14317A052.

2) Talen Letter (PLA-7334), "Susquehanna Steam Electric Station Response to Request for Additional Information on Technical Specification Changes to Adopt Traveler TSTF-425," dated July 02, 2015, ADAMS Accession Number ML15183A248.

3) Talen Letter (PLA-7381), "Susquehanna Steam Electric Station Response to Request for Additional Information on Technical Specification Changes to Adopt Traveler TSTF-425," dated September 21, 2015, ADAMS Accession Number ML15265A347.

4) Talen Letter (PLA-7406), "Susquehanna Steam Electric Station Response to Request for Additional Information on Technical Specification Changes to Adopt Traveler TSTF-425," dated November 11, 2015, ADAMS Accession Number ML15315A045.

5) Talen Letter (PLA-7441), "Susquehanna Steam Electric Station Supplemental Information on Technical Specification Changes to Adopt Traveler TSTF-425," dated January 29, 2016, ADAMS Accession Number ML16032A324.

6) Letter from J. A. Whited, NRC, to J. A. Franke, Talen, "Susquehanna Steam Electric Station, Units 1 and 2- Issuance of Amendments RE: Adoption of TSTF-425 (CAC Nos. MF5151 and MF5152)," dated May 20, 2016, ADAMS Accession Number ML16005A234.

7) Talen Letter (PLA-7486), "Susquehanna Steam Electric Station Proposed Amendment Request to Address Secondary Containment Access Openings," dated July 27, 2016, ADAMS Accession Number ML16210A001.

8) Talen Letter (PLA-7528), "Susquehanna Steam Electric Station Supplemental Information for License Amendment Request to Address Secondary Containment Access Openings," dated September 13, 2016, ADAMS Accession Number ML16257A598.

9) Letter from T. E. Hood, NRC, to B. Berryman, Talen, "Susquehanna Steam Electric Station, Units 1 and 2- Issuance of Amendments RE: Secondary Containment Access Openings (CAC Nos. MF8214 and MF8215)," dated March 27, 2017, ADAMS Accession Number ML17067A444.

10) Talen Letter (PLA-7644), "Susquehanna Steam Electric Station Proposed Amendments to Revise Technical Specifications to Adopt TSTF-551, Revise Secondary Containment Surveillance Requirements," dated December 14, 2017, ADAMS Accession Number ML17348B097.

11) Letter from T. E. Hood, NRC, to B. Berryman, Talen, "Susquehanna Steam Electric Station, Units 1 and 2- Issuance of Amendments Nos. 270 and 252 RE: Technical Specifications to Adopt TSTF-551, 'Revise Secondary Containment Surveillance Requirements' (EPID L-2017-LLA-0410)," dated June 26, 2018, ADAMS Accession Number ML18150A281.

12) Proposed Guidance for Correction of Technical Specification Typographical Errors, SECY-96-238, dated November 19, 1996, ADAMS Accession Number 9611250030.

Enclosure 2:

SSES Unit 1 TS 3.6.4.1- Secondary Containment, Mark-up

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.6.4.1.3	Verify one secondary containment access door in each access opening is closed, except when the access opening is being used for entry and exit.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.1.4	----------NOTE---------- The maximum time allowed for secondary containment draw down is dependent on the secondary containment configuration. ----------	~~----------NOTE----------~~ ~~Test each configuration at least one time every 60 months.~~ ~~----------~~
	Verify each SGT subsystem will draw down the secondary containment to ≥ 0.25 inch of vacuum water gauge in less than or equal to the maximum time allowed for the secondary containment configuration that is OPERABLE.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.1.5	----------NOTE---------- The maximum flow allowed for maintaining secondary containment vacuum is dependent on the secondary containment configuration. ----------	~~----------NOTE----------~~ ~~Test each configuration at least one time every 60 months.~~ ~~----------~~
	Verify each SGT subsystem can maintain ≥ 0.25 inch of vacuum water gauge in the secondary containment for at least 1 hour at a flow rate less than or equal to the maximum flow rate permitted for the secondary containment configuration that is OPERABLE.	In accordance with the Surveillance Frequency Control Program

Enclosure 3:

SSES Unit 2 TS 3.6.4.1- Secondary Containment,

Mark-up

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.6.4.1.3	Verify one secondary containment access door in each access opening is closed, except when the access opening is being used for entry and exit.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.1.4	----------NOTE---------- The maximum time allowed for secondary containment draw down is dependent on the secondary containment configuration. ----------	~~----------NOTE----------~~ ~~Test each configuration at least one time every 60 months.~~ ~~----------~~
	Verify each SGT subsystem will draw down the secondary containment to ≥ 0.25 inch of vacuum water gauge in less than or equal to the maximum time allowed for the secondary containment configuration that is OPERABLE.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.1.5	----------NOTE---------- The maximum flow allowed for maintaining secondary containment vacuum is dependent on the secondary containment configuration. ----------	~~----------NOTE----------~~ ~~Test each configuration at least one time every 60 months.~~ ~~----------~~
	Verify each SGT subsystem can maintain ≥ 0.25 inch of vacuum water gauge in the secondary containment for at least 1 hour at a flow rate less than or equal to the maximum flow rate permitted for the secondary containment configuration that is OPERABLE.	In accordance with the Surveillance Frequency Control Program

Enclosure 4:

SSES Unit 1 TS 3.6.4.1- Secondary Containment,

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SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.6.4.1.3	Verify one secondary containment access door in each access opening is closed, except when the access opening is being used for entry and exit.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.1.4	----------NOTE---------- The maximum time allowed for secondary containment draw down is dependent on the secondary containment configuration. ----------	
	Verify each SGT subsystem will draw down the secondary containment to ≥ 0.25 inch of vacuum water gauge in less than or equal to the maximum time allowed for the secondary containment configuration that is OPERABLE.	In accordance with the Surveillance Frequency Control Program
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	Verify each SGT subsystem can maintain ≥ 0.25 inch of vacuum water gauge in the secondary containment for at least 1 hour at a flow rate less than or equal to the maximum flow rate permitted for the secondary containment configuration that is OPERABLE.	In accordance with the Surveillance Frequency Control Program

Enclosure 5:

SSES Unit 2 TS 3.6.4.1- Secondary Containment,

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SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.6.4.1.3	Verify one secondary containment access door in each access opening is closed, except when the access opening is being used for entry and exit.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.1.4	----------NOTE---------- The maximum time allowed for secondary containment draw down is dependent on the secondary containment configuration. ----------	
	Verify each SGT subsystem will draw down the secondary containment to ≥ 0.25 inch of vacuum water gauge in less than or equal to the maximum time allowed for the secondary containment configuration that is OPERABLE.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.1.5	----------NOTE---------- The maximum flow allowed for maintaining secondary containment vacuum is dependent on the secondary containment configuration. ----------	
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