



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

February 10, 2020

Mr. Kevin Cimorelli
Site Vice President
Susquehanna Nuclear, LLC
769 Salem Boulevard
NUCSB3
Berwick, PA 18603-0467

**SUBJECT: SUSQUEHANNA STEAM ELECTRIC STATION, UNIT NOS. 1 AND 2 -
CORRECTION TO AMENDMENT NOS. 275 AND 257 RE: TEMPORARY
CHANGES TO ALLOW REPLACEMENT OF THE EMERGENCY SERVICE
WATER SYSTEM PIPING (EPID L-2019-LLA-0004)**

Dear Mr. Cimorelli:

On January 17, 2020, the U.S. Nuclear Regulatory Commission (NRC) issued Amendment No. 275 to Renewed Facility Operating License No. NPF-14 and Amendment No. 257 to Renewed Facility Operating License No. NPF-22 for the Susquehanna Steam Electric Station, Unit Nos. 1 and 2, respectively. These amendments consisted of changes to the technical specifications (TSs) in response to your application dated January 9, 2019, as supplemented by letters dated June 3, 2019, and December 9, 2019.

Your staff recently informed us of an error in the NRC staff's safety evaluation on page 8 supporting a temporary extension of completion times for TS 3.7.1 and TS 3.7.2. As described in your application dated January 9, 2019, the only planned piping activity in 2020 is the replacement of the safeguards 480 volt load center transformer 1X210. However, our safety evaluation inadvertently stated that both 1X210 and 1X220 transformers would be replaced.

In addition, the Attachment page for Unit No. 2 indicated that we were removing page 3.7-3e and replacing it with another page 3.7-3e. No page number should have appeared in the Remove column.

The corrected pages are enclosed and contain a marginal line indicating the area of change.

We apologize for any inconvenience. If you have any questions, please contact me at 301-415-8004 or Sujata.Goetz@nrc.gov.

Sincerely,

/RA/

Sujata Goetz, Project Manager
Plant Licensing Branch I
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-387 and 50-388

Enclosures:

1. Corrected Safety Evaluation page 8
2. Corrected Attachment page for
Unit No. 2

cc: Listserv

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WATER SYSTEM PIPING (EPID L-2019-LLA-0004) DATED FEBRUARY 10,
2020

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ENCLOSURE 1

CORRECTED SAFETY EVALUATION PAGE 8

measures 2 and 3 can also employ the FLEX equipment for functional redundancy, should an event occur, and the operable subsystems need to be placed in service.

The licensee noted that during the planned initial ESW piping replacement activities in 2020, the safeguards 480 V load center transformer 1X210 will also be replaced, utilizing the extension to LCO 3.7.1 approved for Susquehanna, Unit 2, in License Amendment No. 248, dated January 26, 2017. That amendment approved a temporary change to the Unit 2 TS 3.7.1 to increase the CT from 72 hours to 7 days to accommodate the 480 V engineered safeguard system load center transformer replacements in Unit 1.

The transformer replacements will occur on the same division as the proposed initial ESW piping replacement. In the January 26, 2017 safety evaluation for License Amendment No. 248, the NRC staff found the following four actions acceptable to mitigate the consequences of a dual unit LOOP and component failure in the only operable RHRSW loop during the transformer replacements by retaining the capability to maintain both units in safety shutdown with the spent fuel pools adequately cooled:

1. Unit 1 in MODE 5 for at least 24 hours, with the core and fuel pools connected through the reactor cavity.
2. Spray pond temperature is maintained less than 82 °F.
3. ESSW pumphouse doors or dampers aligned to provide adequate cooling prior to replacing 1X210 and 1X220.
4. Designated personnel to open the spray array valves and close the bypass valve.

To ensure that the licensee addressed the compensatory measure in the footnotes of the TSs regarding the CT of 14 days for TS 3.7.1 Condition B and TS 3.7.2 Conditions B and C during the replacement of the ESW piping for the opposite unit, the NRC staff requested additional information by e-mail dated May 7, 2019 (ADAMS Accession No. ML19128A023). In its supplemental letter dated June 3, 2019, the licensee determined that it was necessary to revise the wording of the footnotes modifying TS 3.7.1 Condition B and TS 3.7.2 Conditions B and C for both units. Specifically, the licensee proposed revising the wording for all such footnotes to state:

This Completion Time is only applicable during the Unit [1 or 2, as appropriate] 'A' and 'B' ESW piping replacement while the compensatory measures identified in Section 3.3 of Enclosure 1 to letter PLA-7751 are in place. Upon completion of pipe replacement activities, this temporary extension is no longer applicable and will expire on June 25, [2026 or 2027, as appropriate].

The NRC staff found that this proposed response did not adequately define the operating condition of the shutdown unit while in the extended CT and requested additional information in its letter dated November 14, 2019.

The respective required actions of TS 3.7.1 Condition B and TS 3.7.2 Conditions B and C, combined with the compensatory measures, are acceptable remedial measures when the respective LCO is not met during the ESW piping replacements to justify continued operation for up to 14 days during the ESW piping replacements. The staff reviewed the compensatory measures and administrative controls to ensure that they are implemented during the maintenance activity. These compensatory actions provide reasonable assurance that the risk associated with the requested extension of the CTs for the ESW and RHRSW subsystems will

ENCLOSURE 2

CORRECTED ATTACHMENT PAGE FOR UNIT NO. 2

ATTACHMENT TO LICENSE AMENDMENT NO. 257

SUSQUEHANNA STEAM ELECTRIC STATION, UNIT 2

RENEWED FACILITY OPERATING LICENSE NO. NPF-22

DOCKET NO. 50-388

Replace the following page of the Renewed Facility Operating License with the attached revised page. The revised page is identified by amendment number and contains a marginal line indicating the area of change.

REMOVE

Page 3

INSERT

Page 3

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE

TOC - 1

TOC - 2

TOC - 3

TOC - 4

3.7-1

3.7-2

3.7-3

3.7-3a

3.7-3b

3.7-3c

3.7-3d

3.7-4

INSERT

3.7-1

3.7-2

3.7-3

3.7-3a

3.7-3b

3.7-3c

3.7-3d

3.7-3e

3.7-4

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