



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

January 11, 2023

Mr. Derek Jones
Acting Site Vice President
Susquehanna Nuclear, LLC
769 Salem Boulevard
NUCSB3
Berwick, PA 18603-0467

SUBJECT: SUSQUEHANNA STEAM ELECTRIC STATION, UNIT 2 – REGULATORY
AUDIT PLAN IN SUPPORT OF LICENSE AMENDMENT REQUEST TO REVISE
CERTAIN CONTROL ROD TECHNICAL SPECIFICATIONS
(EPID L-2023-LLA-0003)

Dear Mr. Jones:

By letter PLA-8042 dated January 10, 2023 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML23010A265), Susquehanna Nuclear, LLC (the licensee) requested to amend Renewed Facility Operating License No. NPF-22 for Susquehanna Steam Electric Station, Unit 2. The licensee requested to revise certain technical specifications for the control rods.

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the licensee's application and determined that a regulatory audit would assist in the timely completion of the review. The NRC staff will conduct a regulatory audit to support its review in accordance with the enclosed audit plan. A regulatory audit is a planned activity that includes the examination and evaluation of primarily non-docketed information.

The NRC staff will conduct the audit to increase its understanding of the application and identify information that will require docketing to support the NRC staff's regulatory findings. The NRC staff will conduct the audit virtually from approximately January 11-15, 2023.

D. Jones

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If you have any questions, please contact me at (301) 415-0489 or by e-mail at Audrey.Klett@nrc.gov.

Sincerely,

/RA/

Audrey L. Klett, Senior Project Manager
Plant Licensing Branch I
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-388

Enclosure:
Audit Plan

cc: Listserv

**REGULATORY AUDIT PLAN
BY THE OFFICE OF NUCLEAR REACTOR REGULATION
IN SUPPORT OF LICENSE AMENDMENT REQUEST TO REVISE
TECHNICAL SPECIFICATIONS FOR REACTOR STEAM DOME PRESSURE – LOW
INSTRUMENTATION FUNCTION ALLOWABLE VALUES
SUSQUEHANNA NUCLEAR, LLC
SUSQUEHANNA STEAM ELECTRIC STATIONS, UNIT 2
DOCKET NO. 50-388**

1.0 BACKGROUND

By letter PLA-8042 dated January 10, 2023 (Reference 1), Susquehanna Nuclear, LLC, (the licensee) submitted a license amendment request (LAR) to amend the technical specifications (TS) in Renewed Facility Operating License No. NPF-22 for Susquehanna Steam Electric Station, Unit 2. The licensee proposed to modify certain technical specifications for the control rods. The licensee requested the U.S. Nuclear Regulatory Commission (NRC) to process the LAR on an emergency basis.

The NRC staff has started its review of the LAR per NRR Office Instruction LIC-101, “License Amendment Review Procedures” (Reference 2).

2.0 REGULATORY AUDIT BASIS

A regulatory audit is a planned license- or regulation-related activity that includes the examination and evaluation of information of primarily non-docketed information. NRC staff conducts an audit to gain understanding, verify information, and identify information that will require docketing to support the basis of a licensing or regulatory decision. An audit helps the NRC staff with understanding the licensee’s proposed changes, conducting its review, and gaining insights on the licensee’s processes and procedures related to the proposed changes.

The NRC staff will conduct this audit per Office of Nuclear Reactor Regulation (NRR) Office Instruction LIC-111, “Regulatory Audits” (Reference 3), with exceptions noted within this audit plan. The NRC staff will perform the audit to support its evaluation of whether the licensee’s request can be approved per Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.90, “Application for amendment of license, construction permit, or early site permit.” The NRC staff will use the NRR Office Instruction LIC-115, “Processing Requests for Additional Information” (Reference 4), to request information needed to make a licensing or regulatory decision.

3.0 REGULATORY AUDIT SCOPE AND METHODOLOGY

NRC’s goals of the audit are the following:

- Gain a better understanding of the detailed calculations, analyses, and bases underlying the LAR and confirm the staff’s understanding of the LAR.
- Gain a better understanding of plant design features and their implications for the LAR.

- Identify any information needed to enable the staff's evaluation of whether the proposed changes challenge design-basis functions or adversely affect the capability or capacity of plant equipment to perform design-basis functions.
- Identify questions and requests that may become requests for additional information per NRR Office Instruction LIC-115.

4.0 INFORMATION AND OTHER MATERIAL NECESSARY FOR THE AUDIT

The NRC staff will request information (e.g., methodology, process information, and calculations) and interviews throughout the audit period. The NRC staff's initial audit questions and discussion topics are listed in the attachment to this audit plan. The NRC's licensing project manager will email any additional audit questions or requests as supplements to this audit plan so that the licensee can better prepare for audit discussions with NRC staff. The NRC staff requests the licensee to have the requested audit information listed in the audit items list to be readily available and accessible for the NRC staff's review via a Web--based portal. Any information accessed through the licensee's portal will not be held or retained in any way by NRC staff. The NRC staff will schedule audit meetings with the licensee as needed.

5.0 TEAM ASSIGNMENTS

The audit team will consist of the following NRC staff.

- Ravi Grover, Technical Specifications Branch (STSB)
- Audrey Klett, Plant Licensing Branch 1 (LPL1)
- Charles Peabody, Nuclear Systems Performance Branch (SNSB)
- Joseph Ashcraft, Instrumentation and Controls Branch (EICB)

6.0 LOGISTICS

Audit activities will be performed remotely and virtually using Microsoft Teams, teleconference, and any Web-based portals or meeting spaces created by the licensee. NRC information requests and communications with licensee staff will be coordinated through the NRC's licensing project manager.

The audit will occur approximately January 11-15, 2023. If requested, the audit team will conduct a telephone conference with the licensee for the purposes of introducing the team, discussing the scope of the audit, and describing the information to be made available on the internet portal. The audit team will also confirm with the licensee if the information made available on the online portal contains any sensitive or proprietary information. The audit team may request that the licensee and its representatives answer any audit team questions during the audit related to information provided on the portal at a mutually agreeable day and time by telephone conference or Microsoft Teams meetings. The NRC will work with the licensee to schedule additional audit meetings to discuss information needs and questions arising from the NRC's review of the audited information.

The NRC staff requests the licensee to have the information referenced in section 4.0 of this audit plan and any supplemental information requested be available and accessible for the NRC staff's review via an internet-based portal as soon as practical to support the licensee's request that the NRC process the LAR on an emergency basis. The NRC's licensing project manager will inform the licensee via routine communications when the NRC staff no longer needs access

to the portal. The NRC staff requests the licensee to notify the NRC's licensing project manager when an audit item is added to its portal.

7.0 SPECIAL REQUESTS

The NRC requests access to requested documents and information through an online portal that allows the NRC staff to access documents over the Internet. The following conditions associated with the online portal must be maintained while the NRC staff have access to the online portal:

- The online portal will be password-protected. A separate password will be assigned to each member of the NRC staff and NRC contractors participating in the audit.
- The online portal will prevent the NRC participants from printing, saving, downloading, or collecting any information directly from the online portal.
- Conditions of use of the online portal will be displayed on the login screen and will require acknowledgment by each user.

Username and password information should be provided directly to members of the NRC staff and contractors. The NRC licensing project manager will provide the licensee names and contact information of the NRC staff and contractors participating in the audit. All other communications should be coordinated through the NRC project manager.

8.0 DELIVERABLES

The NRC staff will develop any requests for additional information (RAIs), as needed, via NRR Office Instruction LIC-115 and issue such RAIs separately from audit-related correspondence. The NRC staff will issue an audit summary report prior to completing its review of the LAR.

9.0 REFERENCES

1. Letter from D. Jones to the U.S. Nuclear Regulatory Commission, "Susquehanna Steam Electric Station Proposed Emergency Amendment to License NPF-22: Temporary Addition of Analyzed Rod Position Sequence PLA-8042," January 10, 2023 (ADAMS Accession No. ML23010A265)
2. U.S. Nuclear Regulatory Commission, NRR Office Instruction LIC-101, Revision 6, "License Amendment Review Procedures," July 31, 2020 (ADAMS Accession No. ML19248C539)
3. U.S. Nuclear Regulatory Commission, NRR Office Instruction LIC-111, Revision 1, "Regulatory Audits," October 31, 2019 (ADAMS Accession No. ML19226A274)
4. U.S. Nuclear Regulatory Commission, NRR Office Instruction LIC-115, Revision 1, "Processing Requests for Additional Information," August 5, 2021 (ADAMS Accession No. ML21141A238)

LIST OF AUDIT REQUESTS

ITEM No.	AUDIT REQUEST
1	Technical specification bases for technical specifications (TS) 3.1.3, 3.1.6, and 3.3.2.1
2	Discussion of whether the analyzed rod position withdrawal and insertion sequences were developed per the existing control rod drop accident methodology and, if yes, where the methodology addresses the analyzed rod position sequence.
3	Discussion of whether the rod worth minimizer will be reprogrammed from the banked position withdrawal sequence to the analyzed rod position sequence, or whether it will be controlled administratively per TS 3.3.2.1 Required Action C.2.2.
4	Discussion of the actual sequence changes and how the licensee will effectively manage the anticipated control rod friction issues during the restart and power ascension rod manipulations.
5	Discussion of whether the inoperable rods along the periphery be withdrawn from the core.

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CERTAIN CONTROL ROD TECHNICAL SPECIFICATIONS
(EPID L-2023-LLA-0003) DATED JANUARY 11, 2023

DISTRIBUTION:

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RidsRgn1MailCenter Resource	RGrover, NRR
RidsNrrPMSusquehanna Resource	CPeabody NRR
RidsNrrLAKZelevnock Resource	OYee, NRR
RidsNrrDexEmib Resource	JRobinson, NRR
RidsNrrDnrlNvib Resource	

ADAMS Accession No.: ML23010A087

OFFICE	NRR/DORL/LPL1/PM	NRR/DORL/LPL1/LA	NRR/DSS/SNPB/BC
NAME	AKlett	KEntz	DWoodyatt
DATE	01/11/2023	01/11/2023	01/11/2023
OFFICE	NRR/DSS/STSB/BC	NRR/DORL/LPL1/BC	NRR/DORL/LPL1/PM
NAME	VCusumano (RElliott for)	HGonzález	AKlett
DATE	01/11/2023	01/11/2023	01/11/2023

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