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

October 19, 2023

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

SUBJECT: SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2 – REGULATORY AUDIT PLAN IN SUPPORT OF RELIEF REQUEST 5RR-02 (EPID L-2023-LLR-0027)

Dear Mr. Casulli:

By letter PLA-8073 dated June 1, 2023 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML23152A244), Susquehanna Nuclear, LLC (the licensee) proposed an alternative to the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (BPV) Code for inspection of snubber attachments, associated with the fifth 10-Year inservice inspection (ISI) interval for Susquehanna Steam Electric Station, Units 1 and 2 (Susquehanna).

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the licensee's submittal 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 October 23, through November 3, 2023.

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

Sincerely,

Audrey L. Klett

Digitally signed by Audrey L. Klett
Date: 2023.10.19 09:13:48 -04'00'

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

Docket Nos. 50-387 and 50-388

Enclosure:
Audit Plan

cc: Listserv

REGULATORY AUDIT PLAN
IN SUPPORT OF RELIEF REQUEST 5RR-02
SUSQUEHANNA NUCLEAR, LLC
SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2
DOCKET NOS. 50-387 AND 50-388

1.0 BACKGROUND

By letter PLA-8073 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML23152A244), Susquehanna Nuclear, LLC, (the licensee) proposed an alternative to the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (BPV) Code for inspection of snubber attachments, associated with the fifth 10-Year inservice inspection (ISI) interval for Susquehanna Steam Electric Station, Units 1 and 2 (Susquehanna).

The U.S. Nuclear Regulatory Commission (NRC) staff has started its review of the alternative per Office of Nuclear Reactor Regulation (NRR) Office Instruction LIC-102, "Review of Relief Requests, Proposed Alternatives, and Requests to Use Later Code Editions and Addenda" (ML18351A218).

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 NRR Office Instruction LIC-111, "Regulatory Audits" (ML19226A274), 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 50.55a(z), "Alternatives to codes and standards requirements." The NRC staff will use NRR Office Instruction LIC-115, "Processing Requests for Additional Information" (ML21141A238), 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 bases underlying the proposed alternative and confirm the staff's understanding of the proposed alternative.
- Gain a better understanding of plant design features and their implications for the proposed alternative.
- 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 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 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.

- Audrey Klett, Plant Licensing Branch 1
- Gurjendra Bedi, Mechanical Engineering and Inservice Testing Branch
- Nachiketh Chandran, Mechanical Engineering and Inservice Testing Branch
- Stephen Cumblidge, Piping and Head Penetrations Branch

6.0 LOGISTICS

To support the schedule established when the NRC staff accepted the license amendment request (LAR) for technical review, 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 from approximately October 23, through November 3, 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 available and accessible for the NRC staff's review via an internet-based portal on or by October 23, 2023. The NRC staff requests that any supplemental information requested be available and accessible for the NRC staff's review within one week of the date of the NRC's notification to the licensee of the new requests. 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.

The NRC staff does not foresee the need for an onsite visit or in-person discussions between the NRC and licensee staff to discuss information to be provided on the portal at this time. However, if the need for such a meeting is identified in the future, the audit plan will be revised and the schedule for the audit will be adjusted accordingly. The NRC project manager will coordinate any changes to the audit schedule and location with the licensee.

7.0 SPECIAL REQUESTS

The NRC requests access to requested documents and information through a Web-based 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 and contractors 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.

LIST OF AUDIT REQESTS

ITEM No.	AUDIT REQUEST
1	ASME BPV Code, Section XI, IWF-2410, Inspection Program, paragraph (b) requires that "The required examination [of supports and attachments] shall be completed in accordance with the inspection schedule provided in Table IWF-2410-1, Inspection Program;" specifically, inspection period, calendar years of plant service, within the interval (3, 7, and 10 years). Please explain how these supports' inspection schedule interval (3, 7, and 10 years) and inspection schedule interval of snubbers by use of OMN-13 (up to 10 years) and supports containing snubbers will be examined and maintained (i.e., how will the licensee align the different inspection intervals under the two different requirements of the ASME OM Code with Code Case OMN-13 and ASME BPV Code, Section XI?).
2	ASME BPV Code, Section XI, IWF-2430(a) states, in part, that component supports examination performed in accordance with Table IWF-2500-1 (F-A) that reveal flaws or relevant conditions exceeding the acceptance standards of IWF-3400, and that requires corrective measures or repair/replacement activities in accordance with IWF-3122.2, shall be extended, during the current outage, to include the component supports immediately adjacent to flawed supports. Please explain how this situation (to include supports adjacent to flawed supports) will be considered, given that the proposed alternative only considers supports with snubbers. (Note: the adjacent supports could be affected with the snubber.)
3	In the "Proposed Alternative and Basis for Use" section of Alternative Request 5RR-02, it is noted that ASME OM Code Case OMN-13 requires 100% of safety-related snubbers to be examined and evaluated at least once every 10 years. This exceeds the requirements of the 2019 Edition of the ASME BPV Code, Section XI, Table IWF-2500-1 (F-A), which only requires 25% of Class 1, 15% of Class 2, and 10% of Class 3 supports/attachment over a 10-year interval. A. ASME OM Code Case OMN-13 allows extension of the snubber visual examination once every 10 years and can be implemented after the requirements of ISTD-4251, "Initial Examination Interval," and ISTD-4252, "Subsequent Examination Interval," have been satisfied and the previous examination per Table ISTD 4252-1, "Visual Examination Table," was performed satisfactorily at a maximum interval of two fuel cycles. Describe how the proposed snubber examination extended up to 10 years can be aligned with the 10-year ISI interval of the support and attachments (containing the snubber) for inspection. B. While using OMN-13 for snubbers during the extended interval of 10-years, if the number of unacceptable snubbers (pin-to-pin) exceeds Table ISTD-4252-1 limits (these unacceptable snubbers can be found during non-inspection activities, such as walkdowns, or any other events, such as water hammer), describe the action that will be taken and how these findings would align with the supports and attachments inspection (section 3.7(b) of OMN-13 requires that if, any time during an examination interval, the cumulative number of unacceptable snubbers exceeds the applicable values from the column in Table ISTD-4252-1, then the current examination interval shall end, and all remaining examinations must be completed within the current cycle).

ITEM No.	AUDIT REQUEST
	C. If the number of supports with snubbers exceeds the requirements of ASME BPV Code, Section XI, Table IWF-2500-1 (F-A), will any piping supports without snubbers be examined?
4	Describe the method of inspection of newly added supports with snubbers, and supports without snubbers, during the 10-year interval, as per Request 5RR-02 (e.g., if the licensee replaces a support or snubber that failed an inspection during the current interval, how would the inspection process be applied to that new support or snubber?). Please describe how the inspection process would apply the alternative proposed in Alternative Request 5RR-02 and meet IWF-2410(c).

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ADAMS Accession No.: ML23290A262 **NRR-106**

OFFICE	NRR/DORL/LPL1/PM	NRR/DORL/LPL1/LA	NRR/DEX/EMIB/BC
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DATE	10/17/2023	10/18/2023	10/13/2023
OFFICE	NRR/DNRL/NPHP/BC	NRR/DORL/LPL1/BC	NRR/DORL/LPL1/PM
NAME	MMitchell	HGonzález	AKlett
DATE	10/16/2023	10/16/2023	10/19/2023

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