

# UNITED STATES NUCLEAR REGULATORY COMMISSION

REGION I 475 ALLENDALE ROAD KING OF PRUSSIA, PA 19406-1415

March 4, 2011

Mr. Timothy S. Rausch Senior Vice President and Chief Nuclear Officer PPL Susquehanna, LLC 769 Salem Boulevard Berwick, PA 18603-0467

SUBJECT:

ANNUAL ASSESSMENT LETTER FOR SUSQUEHANNA STEAM ELECTRIC

STATION, UNITS 1 AND 2 (05000387/2010001 and 05000388/2010001)

Dear Mr. Rausch:

On February 8, 2011, the Nuclear Regulatory Commission (NRC) completed its end-of-cycle performance review of the Susquehanna Steam Electric Station (Susquehanna) Units 1 and 2. The NRC reviewed the most recent quarterly performance indicators (PIs) in addition to inspection results and enforcement actions from January 1, 2010 through December 31, 2010. This letter informs you of the NRC's assessment of your facility during this period and its plans for future inspections at your facility. This performance review and enclosed inspection plan do not include security information. A separate letter will include the NRC's assessment of your performance in the Security Cornerstone and its security-related inspection plan.

The NRC determined that overall, Susquehanna Units 1 and 2 operated in a manner that preserved public health and safety and met all cornerstone objectives. The NRC determined the performance at Susquehanna Unit 1 during the most recent quarter was within the Regulatory Response Column of the NRC's Reactor Oversight Process (ROP) Action Matrix because of one finding having low to moderate safety significance (i.e., white). The White finding was related to an internal flooding event on July 16, 2010, which required the operators to insert a manual scram and isolate the normal heat sink. The finding was discussed in Inspection Report 05000387;388/2010004 (ML103160334)<sup>1</sup>, finalized in a letter dated December 16, 2010 (ML103500332), and assigned to the 3<sup>rd</sup> quarter 2010.

The NRC determined the performance at Susquehanna Unit 2 was within the Licensee Response Column of the NRC's ROP Action Matrix because all inspection findings had very low safety significance (i.e., green), and all PIs indicated that your performance was within the nominal, expected range (i.e., green). Therefore, the NRC plans to conduct ROP baseline inspections at Susquehanna Unit 2.

As discussed in our assessment follow-up letter on December 16, 2010 (ML103500332), the NRC had planned to conduct Inspection Procedure (IP) 95001, "Inspection For One Or Two White Inputs in a Strategic Performance Area," for the White finding. However, the NRC

Designation in parenthesis refers to an ADAMS accession number. Documents referenced in this letter are publicly available using the accession number in ADAMS.

acknowledges that while outside of the 2010 assessment period, the unplanned scram of January 25, 2011, will cause Unit 1 to transition to the Degraded Cornerstone Column of the NRC's Action Matrix once the 1<sup>st</sup> quarter 2011 PI data for unplanned scrams is reported. As a result, the NRC will provide additional regulatory oversight to include a supplemental inspection using IP 95002, "Inspection for One Degraded Cornerstone or Any Three White Inputs in a Strategic Performance Area," when your staff notifies us of your readiness for this inspection. The IP 95002 inspection is conducted to provide assurance that the root causes and contributing causes of individual and collective risk-significant performance issues are understood, independently assess the extent of condition and extent of cause of individual and collective risk significant performance issues, and provide assurance that licensee corrective actions for risk significant performance issues are sufficient to address the root causes and contributing causes and prevent recurrence. On March 1, 2011, the PPL Manager-Regulatory Affairs (M Crowthers), informed the NRC that PPL requests that the NRC conduct the more detailed IP 95002 (in lieu of the previously planned IP 95001 inspection) to review and potentially close both the White finding and PI.

The NRC identified a cross-cutting theme during this assessment period in the Corrective Action Program (CAP) component of the Problem Identification and Resolution (PI&R) cross-cutting area. Specifically, PPL had four findings with a PI&R cross-cutting aspect of P.1(c) Corrective Action Program — Evaluation of Identified Problems. These findings included a White finding related to the July flooding event (ML103160334) and Green, non-cited violations related to control of Maintenance and Test Equipment (ML110400284), repetitive failures of the Control Structure Chillers (ML102250028), and the failure to correct inaccurate information in an Emergency Operating Procedure (ML100740339).

The NRC acknowledges that PPL completed a common cause analysis that identified evaluation weaknesses near the end of the 4<sup>th</sup> quarter of 2010, and that PPL developed corrective actions which will be implemented during the 1<sup>st</sup> and 2<sup>nd</sup> quarters of 2011. Notwithstanding, the NRC noted that PPL had a number of opportunities during 2010 to identify and address evaluation weaknesses prior to our identification of this cross-cutting theme. Significant among these opportunities was a biennial PI&R inspection (ML100740339) that identified programmatic CAP weaknesses during January 2010. In our evaluation of whether a substantive cross-cutting issue (SCCI) exists, the NRC staff did not have a concern with PPL's scope of efforts or progress to date to address the cross-cutting theme, once identified. Specifically, PPL has implemented corrective actions commensurate with the significance of the issues, and a reasonable duration of time has not yet passed to determine if these actions will be effective in substantially mitigating the theme. Therefore, the NRC determined that a SCCI does not exist in the PI&R cross-cutting area at this time.

The NRC will monitor your scope of efforts and progress in addressing the cross-cutting theme through the baseline inspection program and IP 95002 supplemental inspection to assess the adequacy of your efforts and to determine whether a continuing cross-cutting theme and SCCI should be assigned during subsequent assessment periods.

From January 1 to December 31, 2010, the NRC issued one severity level IV traditional enforcement violation associated with impeding the regulatory process (ML110400284). Therefore, the NRC plans to conduct IP 92702, "Follow-up on Traditional Enforcement Actions including Violations, Deviations, Confirmatory Action Letters, Confirmatory Orders, and Alternative Dispute Resolution Confirmatory Orders," to follow-up on this violation.

T. Rausch

The enclosed inspection plan details the inspections, less those related to physical protection, scheduled through June 30, 2012. Routine inspections performed by resident inspectors are not included in the inspection plan. The inspections listed during the last nine months of the inspection plan are tentative and may be revised at the mid-cycle performance review. The NRC provides the inspection plan to allow for the resolution of any scheduling conflicts and personnel availability issues. The IP 95002 inspection will be scheduled and conducted within 180 days of when you formally inform the NRC that you are ready for this inspection. In addition to the baseline inspections, we also plan on conducting IP 71004 regarding Unit 2 power up-rate activities and the IP 92702 follow-up inspection discussed above. The NRC will contact you as soon as possible to discuss changes to the inspection plan should circumstances warrant.

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In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC website at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

Please contact Paul Krohn at 610-337-5120 with any questions you have regarding this letter.

Sincerely,

Darrell J Roberts, Director Division of Reactor Projects

Docket Nos. 50-387; 50-388 License Nos. NPF-14, NPF-22

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Susquehanna Inspection/ Activity Plan

T. Rausch

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Sincerely,
/RA/
Darrell J Roberts, Director
Division of Reactor Projects

Docket Nos. 50-387; 50-388 License Nos. NPF-14, NPF-22

cc w/encl: Distribution via ListServ

Susquehanna Inspection/ Activity Plan

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#### SUNSI REVIEW COMPLETE: \_AAR (Reviewer's Initials)

ML110620317

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## Susquehanna

## Inspection / Activity Plan

01/01/2011 - 06/30/2012

Unit	Planne	d Dates	l			No. of Staff
Number	Start	End	Inspection A	ctivity	Title	on Site
The second of th	an Principles of the Principle		12/13EXM	- INITIAL	OPERATOR LICENSING EXAM	3
1	01/17/2011	01/21/2011	U01793		FY11- SUSQUEHANNA U1&2 INITIAL OPERATOR LICENSING EXAM	
			1/9EXAM	- SUSQU	EHANNA INITIAL EXAM	6
1	12/12/2011	12/16/2011	U01842		FY12-SUSQ INITIAL OPERATOR LICENSING EXAM	
1	01/16/2012	01/20/2012	U01842		FY12-SUSQ INITIAL OPERATOR LICENSING EXAM	
			71124	- HP		1
1,2	03/21/2011	03/25/2011	IP 2515/179		Verification of Licensee Responses to NRC Requirement for Inventories of Materials Tracked in NSTS	
1, 2	03/21/2011	03/25/2011	IP 71124.01		Radiological Hazard Assessment and Exposure Controls	
1, 2	03/21/2011	03/25/2011	IP 71124.02		Occupational ALARA Planning and Controls	
1, 2	03/21/2011	03/25/2011	IP 71124.03		In-Plant Airborne Radioactivity Control and Mitigation	
1,2	03/21/2011	03/25/2011	IP 71124.05		Radiation Monitoring Instrumentation	
			7111108G	- U2 INSI	ERVICE INSPECTION	1
2	04/11/2011	04/15/2011	IP 71111080	3	Inservice Inspection Activities - BWR	
			71004	- UNIT 2	POWER UPRATE INSPECTION	2
2	04/05/2011	05/15/2011	IP 71004		Power Uprate	
			71124	- HP		1
2	05/02/2011	05/06/2011	IP 71124.01		Radiological Hazard Assessment and Exposure Controls	
2	05/02/2011	05/06/2011	IP 71124.02		Occupational ALARA Planning and Controls	
2	05/02/2011	05/06/2011	IP 71124.03		In-Plant Airborne Radioactivity Control and Mitigation	
			TRI FIRE	- TRIENI	NIAL FIRE PROTECTION INSPECTION	4
1, 2	06/06/2011	06/10/2011	IP 71111057	Г	Fire Protection [Triennial]	
1, 2	06/20/2011	06/24/2011	IP 71111057	г	Fire Protection [Triennial]	
			71124	- REMP		1
1,2	06/06/2011	06/10/2011	IP 71124.07		Radiological Environmental Monitoring Program	•
			92702	- FOLLO	OW UP CA MSPI SLIV VIOLATION	1
1,2	05/30/2011	06/30/2011	IP 92702		Followup On Corrective Actions For Violations And Deviations	
			711111B	- SUSQ	REQUAL INSP W/ P/F RESULTS	2
1, 2	09/19/2011	09/23/2011	IP 7111111	В	Licensed Operator Requalification Program	
			TI-177	- MANA	GING GAS ACCUMULATION IN ECCS	3
1, 2	08/29/2011	09/02/2011	IP 2515/177	•	Managing Gas Accumulation In Emergency Core Cooling, Decay Heat Removal & Containment Spray System	
			<b>EP PROGR</b>	- EP PR	OGRAM INSPECTION	1
1, 2	10/10/2011	10/14/2011	IP 7111402		Alert and Notification System Testing	
1, 2	10/10/2011	10/14/2011	IP 7111403		Emergency Preparedness Organization Staffing and Augmentation System	
1, 2	10/10/2011	10/14/2011	IP 7111404		Emergency Action Level and Emergency Plan Changes	
1,2	10/10/2011	10/14/2011	IP 7111405		Correction of Emergency Preparedness Weaknesses and Deficiencies	

This report does not include INPO and OUTAGE activities.

This report shows only on-site and announced inspection procedures.

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## Susquehanna

## Inspection / Activity Plan

01/01/2011 - 06/30/2012

Planne	d Dates	1		No. of Staff
Start	End	Inspection Activity	Title	on Site
and her distributed by the 200 kg/s constitution		EP PROGR - EP F	PROGRAM INSPECTION	1
10/10/2011	10/14/2011	IP 71151-EP01	Drill/Exercise Performance	
10/10/2011	10/14/2011	IP 71151-EP02	ERO Drill Participation	
10/10/2011	10/14/2011	IP 71151-EP03	Alert & Notification System	
		71124 - HP		1
10/17/2011	10/21/2011	IP 60855.1	Operation of an Independent Spent Fuel Storage Installation at Operating Plants	
10/17/2011	10/21/2011	IP 71124.01	Radiological Hazard Assessment and Exposure Controls	
10/17/2011	10/21/2011	IP 71124.02	Occupational ALARA Planning and Controls	
10/17/2011	10/21/2011	IP 71124.03	In-Plant Airborne Radioactivity Control and Mitigation	
		71152B - PI&I	R	4
02/13/2012	02/17/2012	IP 71152B	Identification and Resolution of Problems	
02/27/2012	03/02/2012	IP 71152B	Identification and Resolution of Problems	
		71124 - OCC	C RAD SAFETY	1
02/20/2012	02/24/2012	IP 71124.01	Radiological Hazard Assessment and Exposure Controls	
02/20/2012	02/24/2012	IP 71124.02	Occupational ALARA Planning and Controls	
02/20/2012	02/24/2012	IP 71124.03	In-Plant Airborne Radioactivity Control and Mitigation	
		7111108G - INS	ERVICE INSPECTION	1
04/02/2012	04/06/2012	IP 7111108G	Inservice Inspection Activities - BWR	
		71124 - OC	C RAD SAFETY	1
04/02/2012	04/06/2012	IP 71124.01	Radiological Hazard Assessment and Exposure Controls	
04/02/2012	04/06/2012	IP 71124.02	Occupational ALARA Planning and Controls	
		60855 - ISF	SI CAMPAING LOADING INSPECTION	1
06/01/2012	09/30/2012	IP 60855	Operation Of An ISFSI	
	Start  10/10/2011 10/10/2011 10/10/2011 10/17/2011 10/17/2011 10/17/2011 10/17/2011 02/13/2012 02/27/2012 02/20/2012 02/20/2012 04/02/2012 04/02/2012 04/02/2012	10/10/2011 10/14/2011 10/10/2011 10/14/2011 10/10/2011 10/14/2011 10/17/2011 10/21/2011 10/17/2011 10/21/2011 10/17/2011 10/21/2011 10/17/2011 10/21/2011 10/17/2011 00/21/2011 02/13/2012 02/17/2012 02/27/2012 03/02/2012 02/20/2012 02/24/2012 02/20/2012 02/24/2012 02/20/2012 02/24/2012 04/06/2012 04/06/2012 04/02/2012 04/06/2012	Start   End   Inspection Activity   EP PROGR - EP F   10/10/2011   10/14/2011   IP 71151-EP01   10/10/2011   10/14/2011   IP 71151-EP02   10/10/2011   10/14/2011   IP 71151-EP03   71124	Start   End   Inspection Activity   Title