



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

November 6, 2012

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

SUBJECT: SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2 –  
SUPPLEMENTAL INFORMATION NEEDED FOR ACCEPTANCE OF  
REQUESTED LICENSING ACTION RE: EXEMPTION REQUEST FROM THE  
BIENNIAL EMERGENCY PREPAREDNESS EXERCISE REQUIREMENTS OF  
10 CFR 50, APPENDIX E, SECTION IV.F.2.b (TAC NOS. ME9845 AND  
ME9846)

Dear Mr. Rausch:

By letter dated October 25, 2012,<sup>1</sup> PPL Susquehanna, LLC, (PPL) submitted an exemption request from the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, Appendix E, Section IV.F.2.b. for Susquehanna Steam Electric Station, Units 1 and 2 (SSES 1 and 2). Specifically, PPL requests postponement of the evaluation of the onsite elements of the SSES 1 and 2 biennial Emergency Preparedness exercise from October 23, 2012 to February 26, 2012. The purpose of this letter is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this exemption request. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Pursuant to Section 50.12(a) of 10 CFR, the NRC may, upon application by any interested person or upon its own initiative, grant exemptions from the requirements of the regulations of this part, which are authorized by law, will not present an undue risk to the public health and safety, and are consistent with the common defense and security. However, the NRC will not consider granting an exemption unless special circumstances are present.

The NRC staff has reviewed the application and concluded that the information delineated in the enclosure to this letter is necessary to enable the staff to make an independent assessment regarding the acceptability of the proposed exemption in terms of regulatory requirements and the protection of public health and safety and the environment.

In order to make the application complete, the NRC staff requests that PPL supplement the application to address the information requested in the enclosure by November 19, 2012. This will enable the NRC staff to begin its detailed technical review. If the information responsive to the NRC staff's request is not received by the above date, the application will not be accepted

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<sup>1</sup> Agencywide Documents Access and Management System Accession No. ML12300A108.

T. Rausch

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for review pursuant to 10 CFR 2.101, and the NRC will cease its review activities associated with the application. If the application is subsequently accepted for review, you will be advised of any further information needed to support the staff's detailed technical review by separate correspondence.

The information requested and associated time frame in this letter was discussed with Mr. John Tripoli of your staff on November 6, 2012.

If you have any questions, please contact me, at (301) 415-4090.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey A. Whited". The signature is fluid and cursive, with the first name being the most prominent.

Jeffrey A. Whited, Project Manager  
Plant Licensing Branch I-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-387 and 50-388

Enclosure:  
As stated

cc w/encl: Distribution via Listserv

SUPPLEMENTAL INFORMATION NEEDED

EXEMPTION REQUEST FROM 10 CFR 50

APPENDIX E SECTION IV.F.2.B

PPL SUSQUEHANNA, LLC

ALLEGHENY ELECTRIC COOPERATIVE, INC.

SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2

DOCKET NOS. 50-387 AND 50-388

By letter dated October 25, 2012, PPL Susquehanna, LLC, (PPL) submitted an exemption request from the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, Appendix E, Section IV.F.2.b. for Susquehanna Steam Electric Station, Units 1 and 2 (SSES 1 and 2). Specifically, PPL requests postponement of the evaluation of the onsite elements of the SSES 1 and 2 biennial Emergency Preparedness exercise October 23, 2012 to February 26, 2012.

Pursuant to 10 CFR 50.12(a), the Nuclear Regulatory Commission (NRC) may, upon application by any interested person or upon its own initiative, grant exemptions from the requirements of the regulations of this part, which are authorized by law, will not present an undue risk to the public health and safety, and are consistent with the common defense and security. However, the NRC will not consider granting an exemption unless special circumstances are present.

In the attachment to letter dated October 25, 2012, PPL Susquehanna, LLC, (PPL) discusses how the exemption request meets the criteria of 10 CFR 50.12(a)(1), however, it is unclear which of the special circumstances in accordance with 10 CFR 50.12(a)(2), are present in the request.

Page 1 of the attachment states,

A one-time change in the exercise schedule increases the interval between biennial exercises, but in most cases the postponed exercise still falls within the 35 month window thus meeting the intent of the regulation cited in the [regulatory issue summary] RIS.

It is unclear to the NRC staff whether this is a statement, or if this is citing Section 50.12(a)(2) special circumstance criterion (ii) which states, "Application of the regulation in the particular circumstances would not serve the underlying purpose of the rule or is not necessary to achieve the underlying purpose of the rule".

Enclosure

Page 1 of the attachment also states,

The Unit 1 shutdown will affect a significant number of employees who will then not be available to support the drill. PPL had planned to deploy approximately 115 players and controllers to conduct the exercise. This includes an operating shift as well as several key managers. During an outage, these individuals are deployed on different shifts and typically are covering 12-hour periods staffing our Outage Control Center and other outage functions 24 hours a day. October 23 was the fourth day of the Unit 1 outage. In addition, SSES Unit 2 is still in operation.

Page 2 of the attachment states,

Although the conduct of an exercise or drill and associated critiques involves only a limited amount of time, it would be an undue burden during this period of time to manage this activity during the course of an outage.

It is unclear to the NRC staff whether these are statements or if they are citing Section 50.12(a)(2) special circumstance criterion (iii) which states, "Compliance would result in undue hardship or other costs that are significantly in excess of those contemplated when the regulation was adopted, or that are significantly in excess of those incurred by others similarly situated".

Page 2 of the attachment also states,

From a risk perspective, PPL believes it is less risk to public health and safety to reschedule the onsite portion of the exercise to February 26, 2013.

It is unclear to the NRC staff whether this is a statement or if this is citing Section 50.12(a)(2) special circumstance criterion (iv) which states, "The exemption would result in benefit to the public health and safety that compensates for any decrease in safety that may result from the grant of the exemption".

Page 2 of the attachment also states,

This request for an exemption provides only temporary relief since the onsite portion of the exercise will be performed on February 26, 2013. PPL made a good faith effort to comply with the regulation. An extensive amount of planning was performed, a challenging scenario was developed, and required submission dates for exercise scenarios were met.

It is unclear to the NRC staff whether this is a statement or if this is citing Section 50.12(a)(2) special circumstance criterion (v) which states, "The exemption would provide only temporary relief from the applicable regulation and the licensee or applicant has made good faith efforts to comply with the regulation".

In order to make the application complete, the NRC staff requests that PPL supplement the application to specifically identify which special circumstances are present in the request. The NRC staff also requests that the basis for the special circumstances be clearly outlined in the supplement.

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for review pursuant to 10 CFR 2.101, and the NRC will cease its review activities associated with the application. If the application is subsequently accepted for review, you will be advised of any further information needed to support the staff's detailed technical review by separate correspondence.

The information requested and associated time frame in this letter was discussed with Mr. John Tripoli of your staff on November 6, 2012.

If you have any questions, please contact me, at (301) 415-4090.

Sincerely,

*/RA/*

Jeffrey A. Whited, Project Manager  
Plant Licensing Branch I-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-387 and 50-388

Enclosure:  
As stated

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**\*via email**

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DATE	11/06/2012	11/06/2012	11/06/2012	11/06/2012	11/06/2012

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