



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

February 11, 2021

LICENSEE: Susquehanna Nuclear, LLC

FACILITY: Susquehanna Steam Electric Station, Units 1 and 2

SUBJECT: SUMMARY OF THE JANUARY 26, 2021, MEETING WITH SUSQUEHANNA NUCLEAR REGARDING A FUTURE LICENSE AMENDMENT REQUEST RELATED TO ADOPTING TECHNICAL SPECIFICATIONS TASK FORCE TRAVELER TSTF-505, REVISION 2 (EPID L-2020-LRM-0118)

On January 26, 2021, a Category 1 public teleconference meeting was held between the U.S. Nuclear Regulatory Commission (NRC) staff and the representatives of Susquehanna Nuclear (the licensee) using video conferencing capabilities. The purpose of the meeting was to discuss a future license amendment request (LAR) for Susquehanna Steam Electric Station Units 1 and 2 (Susquehanna) to adopt Technical Specifications Task Force (TSTF) Traveler TSTF-505, "Provide Risk-Informed Extended Completion Times – RITSTF [Risk-Informed TSTF] Initiative 4b," Revision 2 (Agencywide Documents Access and Management System (ADAMS) Package Accession No. ML18183A493). The meeting notice dated January 5, 2021, is available in ADAMS at Accession No. ML21005A161, and the meeting slides provided by Susquehanna Nuclear are available at ADAMS Accession No. ML21025A175. A list of attendees is provided as an enclosure to this letter.

The licensee expects to submit the proposed LAR for Susquehanna, Units 1 and 2, by the end of March 2021.

The proposed amendment would revise technical specification (TS) requirements to permit the use of risk-informed completion times (RICTs) for 22 limiting condition of operations (LCOs) for both units. The RICTs would be applicable in Modes 1 and 2. The licensee is not proposing to apply RICTs to loss of function actions and is proposing the following variations from TSTF-505, Revision 2, for Susquehanna:

- Propose to include some plant-specific Required Actions that are not in TSTF-505.
- Propose to include TS 3.3.2.1 in the RICT program, which has been generically excluded from TSTF-505.
- TSTF-505 has some Conditions and Required Actions that are in standard technical specifications, but are not applicable to Susquehanna.

Regarding probabilistic risk assessment (PRA), the licensee stated that:

- Susquehanna plans to use internal events, internal fire, and internal flooding models.

- Susquehanna does not have a seismic PRA model and a seismic penalty will be applied to all RICTs. Additional large early release frequency will be applied when containment is de-inerted.
- Other external hazards have been screened out.
- Software being used will be similar to the one use for Maintenance rule (a)(4) configuration risk management program.

The NRC staff asked the licensee about the revision of Regulatory Guide (RG) 1.200, "An Approach for Determining The Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities," that would be supporting the application. The licensee stated that Revision 2 of RG 1.200, dated March 2009 (ADAMS Accession No. ML090410014), will be followed.

The licensee stated during the meeting that mitigating strategies (FLEX) were credited in the PRA. The NRC staff stated that the depth and level-of-detail of the staff's review of FLEX modeling is commensurate with its impact on the RICT calculations. The NRC staff cited Question 05 ("Probabilistic Risk Assessment Modeling and Uncertainty of FLEX Equipment and Actions") in the Peach Bottom Supplement to License Amendment Request, dated December 2, 2020 (ADAMS Accession No. ML20337A301), as a representative example of the type of information requested as part of the staff's review of FLEX modeling.

The licensee stated during the meeting that the PRA was peer reviewed in accordance with RG 1.200, Revision 2, and that a number of facts and observations (F&Os) were identified. The licensee further stated that 13 F&Os remain open after an F&O closure review was performed in accordance with Appendix X to Nuclear Energy Institute (NEI) 05-04/07-12/12-[13], "Close-Out of Facts and Observations (F&Os)." It was not clear to the NRC staff when this F&O closure review was conducted and whether it used the final revision of Appendix X dated February 21, 2017 (ADAMS Accession No. ML17086A431), as accepted by NRC in its letter dated May 3, 2017 (ADAMS Accession No. ML17079A427), which specifies conditions for accepting Appendix X. The NRC staff noted that F&O closure reviews conducted by other licensees before May 2017 typically used draft Appendix X guidance that had gaps relative to the final guidance as accepted by NRC. The NRC staff provided feedback that the LAR should indicate whether the F&O closure review is consistent with Appendix X, as accepted (with conditions) by NRC's letter dated May 3, 2017. If not consistent, the LAR should include one of the following to address the inconsistency: (1) describe the results of a gap assessment between the F&O closure review and Appendix X, as accepted, and how any gaps were resolved (which may require reconvening the independent assessment team, as applicable), or (2) disposition the F&Os that were closed during the F&O closure review.

No one identified themselves as being members of the public during the meeting. Public meeting feedback forms were not received.

Please direct any inquiries to me at 301-415-8004 or Sujata.Goetz@nrc.gov.

/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

Enclosure:
List of Attendees

cc: Listserv

LIST OF ATTENDEES

MEETING WITH SUSQUEHANNA NUCLEAR REGARDING A FUTURE
LICENSE AMENDMENT REQUEST RELATED TO ADOPTING
TECHNICAL SPECIFICATIONS TASK FORCE TRAVELER TSTF-505, REVISION 2
AT SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2
JANUARY 26, 2021

Name	Affiliation
Sue Goetz	U.S. Nuclear Regulatory Commission (NRC)
Ed Miller	NRC
Khadijah West	NRC
Robert Pascarelli	NRC
Andrea Russell	NRC
Jay Robinson	NRC
Henry Wagage	NRC
Ahsan Sallman	NRC
Charles Moulton	NRC
Keith Tetter	NRC
Corey Dukehart	NRC
James Danna	NRC
Victor Cusumano	NRC
James Kim	NRC
Shilp Vasavada	NRC
Bernard Grenier	NRC
Alexander Schwab	NRC
Joshua Havertape	NRC
Henry Marchlewski	NRC
Malcolm Patterson	NRC
Todd Hilsmeier	NRC
Steven Alfernik	NRC
Mark Wishart	Jensen Hughes Contractors
Nicholas Sternowski	Jensen Hughes Contractors
Shane Jurek*	Susquehanna Nuclear
Katie Brown	Susquehanna Nuclear
Melisa Krick	Susquehanna Nuclear
Brian Vresko	Susquehanna Nuclear
Ian Francis	Susquehanna Nuclear
Jake Boyer	Susquehanna Nuclear
Dave Ambrose	Susquehanna Nuclear
David Hoppe	Susquehanna Nuclear
John Schrage	Entergy

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ADAMS Accession No. ML21035A184

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DATE	02/08/2021	02/05/2021	02/11/2021	02/11/2021

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