

Timothy S. Rausch
Senior Vice President & Chief Nuclear Officer

PPL Susquehanna, LLC
769 Salem Boulevard
Berwick, PA 18603
Tel. 570.542.3345 Fax 570.542.1504
tsrausch@pplweb.com



FEB 25 2015

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

**SUSQUEHANNA STEAM ELECTRIC STATION
FOURTH SIX-MONTH STATUS REPORT IN
RESPONSE TO MARCH 12, 2012 COMMISSION
ORDER MODIFYING LICENSES WITH REGARD
TO RELIABLE SPENT FUEL POOL LEVEL
INSTRUMENTATION (NRC ORDER EA-12-051)
PLA-7296**

**Docket No. 50-387
and No. 50-388**

References:

1. *NRC Order Number EA-12-051, Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation, dated March 12, 2012*
2. *NRC Interim Staff Guidance JLD-ISG-2012-03, Compliance with Order EA-12-051, Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation, Revision 0, dated August 29, 2012*
3. *NEI 12-02, Industry Guidance for Compliance with NRC Order EA-12-051, "To Modify Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation," Revision 1, dated August 2012*
4. *PPL Letter (PLA-6925) PPL Susquehanna's Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated October 29, 2012*
5. *PPL Letter (PLA-6980) PPL Susquehanna's Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated February 28, 2013*
6. *PPL Letter (PLA-7073) PPL Susquehanna's First Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated August 26, 2013*
7. *PPL Letter (PLA-7138) PPL Susquehanna's Second Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated February 27, 2014*
8. *PPL Letter (PLA-7222) PPL Susquehanna's Third Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated August 27, 2014*

The purpose of this letter is to provide the fourth six-month status report pursuant to Section IV, Condition C.2, of Reference 1, that delineates progress made in implementing the requirements of Reference 1.

On March 12, 2012, the Nuclear Regulatory Commission ("NRC" or "Commission") issued an order (Reference 1) to PPL Susquehanna, LLC (PPL). Reference 1 was immediately effective and directs PPL to install reliable spent fuel pool level instrumentation. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance (Reference 2) and an overall integrated plan pursuant to Section IV, Condition C. Reference 2 endorses industry guidance document NEI 12-02, Revision 1 (Reference 3) with clarifications and exceptions identified in Reference 2. Reference 4 provided PPL's initial status report regarding Spent Fuel Pool Level Instrumentation. Reference 5 provided PPL's overall integrated plan for Spent Fuel Pool Level Instrumentation.

Reference 1 requires submission of status reports at six-month intervals following submittal of the overall integrated plan. Reference 3 provides direction regarding the content of the status reports. References 6, 7 and 8 provided PPL's first, second, and third six-month updates. The enclosure provides an update of milestone accomplishments since the last status report, including any changes to the compliance method, schedule, or need for relief and the basis, if any. Any changes are identified in the enclosure.

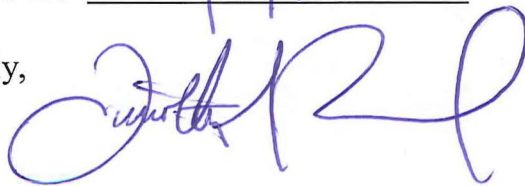
This letter contains no new regulatory commitments.

If you have any questions regarding this report, please contact Mr. Jeffery N. Grisewood, Manager – Nuclear Regulatory Affairs, at (570) 542-1330.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 2/25/15

Sincerely,



T. S. Rausch

Enclosure: PPL Susquehanna, LLC's Fourth Six Month Status Report for the
Implementation of NRC Order EA-12-051, Order Modifying Licenses with
Regard to Requirements for Reliable Spent Fuel Pool Level Instrumentation.

Copy: NRC Region I
Mr. J. E. Greives, NRC Sr. Resident Inspector
Mr. J. A. Whited, NRC Project Manager
Mr. L. J. Winker, PA DEP/BRP

Enclosure to PLA-7296

**PPL Susquehanna, LLC's Fourth Six Month
Status Report for the Implementation of NRC
Order EA-12-051, Order Modifying Licenses
with Regard to Requirements for Reliable Spent
Fuel Pool Level Instrumentation**

**PPL Susquehanna, LLC's Fourth Six Month Status Report
for the Implementation of NRC Order EA-12-051,
Order Modifying Licenses with Regard to Requirements
for to Reliable Spent Fuel Pool Level Instrumentation**

1. Introduction

PPL Susquehanna, LLC (PPL) developed an Overall Integrated Plan (Reference 8.1) [NOTE: References cited in this enclosure are contained in Section 8], documenting the requirements to install reliable Spent Fuel Pool Level Instrumentation (SFPLI), in response to Reference 8.2. This attachment provides an update of milestone accomplishments since submittal of the Overall Integrated Plan, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

2. Milestone Accomplishments

Training on the new SFPLI system has started since the third six-month update submitted under Reference 8.9. The milestones are current as of January 31, 2015.

3. Milestone Schedule Status

The following table provides a milestone schedule that supports the Overall Integrated Plan. This section provides the activity status of each item and the expected completion date noting any change. The dates are planning dates subject to change as design and implementation details are developed.

The revised milestone target completion dates do not impact the Order implementation date at this time.

Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Submit 60-Day Status Report	Oct 2012	Complete	
Submit Overall Integrated Plan	Feb 2013	Complete	
Submit 6 Month Updates:			
Update 1	Aug 2013	Complete	
Update 2	Feb 2014	Complete	
Update 3	Aug 2014	Complete	

Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Update 4	Feb 2015	Complete*	
Update 5	Aug 2015	Not Started	
Modifications:			
Modification Scoping Evaluation	July 2013	Complete	
Issue Unit 1 and Unit 2 Engineering Changes	March 2014	Complete	April 2014
Implementation Outage	June 2015	Not Started	May 2015
Procedures:			
Create Procedures	March 2015	Started	April 2015*
Training:			
Develop Training Plan	Dec 2014	Complete*	
Training Complete	March 2015	Started*	April 2015*
Full Site SFPLI Implementation	June 2015	Started*	May 2015
Submit Completion Report	August 2015	Not Started	July 2015
* Revised since the six month update submitted August 27, 2014 (Reference 8.9)			

4. Changes to Compliance Method

There are no changes to the compliance method as documented in the Overall Integrated Plan (Reference 8.1).

5. Need for Relief/Relaxation and Basis for the Relief/Relaxation

PPL expects to comply with the order implementation date and no relief/relaxation is required at this time.

6. Open Items from Overall Integrated Plan and Draft Safety Evaluation

Reference 8.6 provided PPL's Response to NRC's Request for Additional Information (RAI) identified in Reference 8.7. Reference 8.8 identifies that the licensee should not formally submit RAI responses on the docket but instead, put the responses and supporting information on their ePortal by September 30, 2014, as identified in the Interim Staff Evaluation (ISE). Susquehanna complied with this request.

The NRC stated that the RAIs will be closed by the Regulatory Audit Process. The NRC performed the Mitigation Strategies and Spent Fuel Pool Level Instrumentation Audit at Susquehanna the week of December 8, 2014. During the Audit Exit meeting the NRC considered all SFPLI related RAIs to be closed. The NRC's Audit Report will document the closure status of the SFPLI RAIs.

7. Potential Draft Safety Evaluation Impacts

None - PPL Susquehanna has not received a draft Safety Evaluation at this time but has received an ISE (Reference 8.7). The NRC performed the Mitigation Strategies and Spent Fuel Pool Level Instrumentation Audit at Susquehanna the week of December 8, 2014. During the Audit Exit meeting the NRC considered all SFPLI related RAIs from the ISE to be closed. The NRC's Audit Report will document the closure status of the SFPLI RAIs.

8. References

The following references support the updates to the Overall Integrated Plan described in this enclosure.

- 8.1 PLA-6980, "PPL Susquehanna's Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)," dated February 28, 2013.
- 8.2 NRC Order Number EA-12-051, "Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation," dated March 12, 2012.
- 8.3 NRC Interim Staff Guidance JLD-ISG-2012-03, "Compliance with Order EA-12-051, Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation, Rev 0", dated August 29, 2012.
- 8.4 NEI 12-02, "Industry Guidance for Compliance with Order EA-12-051 to Modify Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation, Revision 1", August 2012.

- 8.5 PLA-7026, "PPL Susquehanna's Response to Request for Additional Information on Overall Integrated Plan in Response to Order EA-12-051, Reliable Spent Fuel Pool Instrumentation," dated July 3, 2013.
- 8.6 PLA-7138, "PPL Susquehanna's Second Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)", dated February 27, 2014.
- 8.7 NRC Letter titled, "Susquehanna Steam Electric Station, Units 1 And 2 - Interim Staff Evaluation And Request For Additional Information Regarding the Overall Integrated Plan For Implementation Of Order EA-12-051, Reliable Spent Fuel Pool Instrumentation" (TAC NOS. MF0890 AND MF0891)," dated November 6, 2013.
- 8.8 NRC Letter titled, "Nuclear Regulatory Commission Audit of Licensee Responses to Reliable Spent Fuel Pool Instrumentation Order EA-12-051," dated March 26, 2014.
- 8.9 PLA-7222, "PPL Susquehanna's Third Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)", dated August 27, 2014.