Enclosure 2 of the Attachment contains Security-Related information and must be protected accordingly.

Upon separation of the Enclosure 2, this letter is decontrolled.

Timothy S. Rausch Senior Vice President & Chief Nuclear Officer

FEB 2 5 2015

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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 REQUIREMENTS FOR MITIGATION STRATEGIES FOR BEYOND-DESIGN-BASIS EXTERNAL EVENTS (NRC ORDER EA-12-049) PLA-7295

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

References:

- 1. NRC Order EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012
- 2. NRC Interim Staff Guidance JLD-ISG-2012-01, "Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," Revision 0, dated August 29, 2012
- 3. NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide," Revision 0, dated August 2012
- 4. PPL Letter (PLA-6923), "Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)," dated October 29, 2012
- 5. PPL Letter (PLA-6981), "Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (NRC Order EA-12-049)," dated February 28, 2013
- 6. PPL Letter (PLA-7072), "Request for Implementation Date Relief in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (NRC Order EA-12-049)," dated August 26, 2013
- 7. NRC Order EA-13-109, "Order to Modify Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation under Severe Accident Conditions," dated June 6, 2013
- 8. PPL Letter (PLA-7071), "First Six Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)," dated August 26, 2013
- PPL Letter (PLA-7134), "Request for Relaxation from NRC Order EA-12-049, 'Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events'" dated February 20, 2014
- 10. NRC Letter from J. S. Bowen to T. S. Rausch, "Susquehanna Steam Electric Station, Units 1 and 2 Interim Staff Evaluation Relating To Overall Integrated Plan In Response To Order EA-12-049 (Mitigation Strategies) (TAC NOS. MF0888 and MF0889)," dated January 24, 2014 (ADAMS # ML13339A764)

Enclosure 2 of the Attachment contains proprietary information. Withhold from public disclosure under 10CFR2.390(d)(1), as other than Safeguards Information, and designated as Security Sensitive Information. When Enclosure 2 of the Attachment is separated, the remainder of the Attachment and this cover letter are decontrolled.

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- 11. PPL Letter (PLA-7137), "Second Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (NRC Order EA-12-049)," dated February 28, 2014
- 12. NRC Letter from E. J. Leeds to T. S. Rausch, "Susquehanna Steam Electric Station Units 1 and 2 Relaxation of Certain Schedule Requirements for Order EA-12-049 'Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond Design Basis External Events," dated April 15, 2014
- 13. PPL Letter (PLA-7204), "Third Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (NRC Order EA-12-049)," dated August 28, 2014

The purpose of this letter is to provide PPL Susquehanna, LLC's (PPL) 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. Enclosure 1 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. Enclosure 2 is a revision of the Mitigation Strategies Overall Integrated Plan that includes several updates. The information provided in Enclosure 2 is considered to contain information concerning physical protection not otherwise designated as Safeguards Information and is designated "Security Sensitive Information" as defined in 10 CFR 2.390 (d)(1). Accordingly, PPL requests that the information provided in Enclosure 2 to the letter be withheld from public disclosure.

On March 12, 2012, the Nuclear Regulatory Commission ("NRC" or "Commission") issued an order (Reference 1) to PPL. Reference 1 was immediately effective and directs PPL to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment cooling, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. 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 12-06, Revision 0 (Reference 3) with clarifications and exceptions identified in Reference 2. Reference 4 provided PPL's initial status report regarding Mitigation Strategies. Reference 5 provided PPL's initial Mitigation Strategies Overall Integrated Plan.

Reference 1 requires submission of a status report at six-month intervals following submittal of the Overall Integrated Plan. Reference 3 provides direction regarding the content of the status reports.

The Request for Relaxation contained in Reference 9 supersedes the Request for Relief made in Reference 6. The Request for Relaxation is based on NRC mandated changes to the Hardened Containment Vent System implementation dates that impact the Mitigation

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Strategy Overall Integrated Plan. Specifically, the change in implementation dates for the Hardened Containment Vent Order (NRC Order EA-12-050 was rescinded and superseded by NRC Order EA-13-109) impacts the Mitigation Strategy Overall Integrated Plan and implementation timeline. The NRC approved this relaxation in Reference 12.

This letter contains no new or revised 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:

Sincerely,

T. Sl Rausch

Enclosure 1: PPL Susquehanna, LLC's Fourth Six Month Status Report for the Implementation of NRC Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events

Enclosure 2: PPL Susquehanna's Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), (February 2015) Security-Related Information -Withhold from Public Disclosure Under 10 CFR 2.390

Copy: NRC Region I

Mr. J. E. Greives, NRC Sr. Resident Inspector

Ms. Jessica A. Kratchman, NRR/JLD/PMB, NRC

Mr. J. A. Whited, NRC Project Manager

Mr. L. J. Winker, PA DEP/BRP