



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

DEC 20 1984

Docket No.: 50-388

Mr. Norman W. Curtis
Vice President
Engineering and Construction Nuclear
Pennsylvania Power & Light Company
2 North Ninth Street
Allentown, Pennsylvania 18101

Dear Mr. Curtis:

SUBJECT: AMENDMENT NO. 4 TO FACILITY OPERATING LICENSE NO. NPF-22 -
SUSQUEHANNA STEAM ELECTRIC STATION, UNIT 2

The Nuclear Regulatory Commission has issued the enclosed Amendment No. 4 to Facility Operating License No. NPF-22 for the Susquehanna Steam Electric Station, Unit 2. The amendment is in response to your letter dated May 3, 1984. The amendment incorporates Change S into the Physical Security Plan and License Condition 2.D of Facility Operating License No. NPF-22.

A copy of the related safety evaluation supporting Amendment No. 4 to Facility Operating License NPF-22 is enclosed.

Sincerely,

A handwritten signature in cursive script, appearing to read "A. Schwencer".

A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing

Enclosures:

1. Amendment No. 4 to NPF-22
2. Safety Evaluation

cc: See next page

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Original signed by

A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing

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See Attached

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Susquehanna

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Vice President
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Allentown, Pennsylvania 18101

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Resident Inspector
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Bechtel Power Corporation
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P. O. Box 2357
Harrisburg, Pennsylvania 17120

Mr. William Matson
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212 Locust Street
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Harrisburg, PA 17108-1266

Susquehanna

cc: Governor's Office of State Planning & Development
Attn: Coordinator, State Clearinghouse
P O. Box 1323
Harrisburg, Pennsylvania 17120

Mr. Bruce Thomas, President
Board of Supervisors
R. D. #1
Berwick, Pennsylvania 18603

U. S. Environmental Protection Agency
Attn: EIS Coordinator
Region III Office
Curtis Building
6th and Walnut Streets
Philadelphia, Pennsylvania 19106

DEC 20 1984

Issuance of Amendment No. 4 to Facility Operating Licence No NPF-22
Susquehanna Steam Electric Station, Unit 2

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TBarnhart(4)

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

PENNSYLVANIA POWER & LIGHT COMPANY

ALLEGHENY ELECTRIC COOPERATIVE INC.

DOCKET NO. 50-388

SUSQUEHANNA STEAM ELECTRIC STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 4
License No. NPF-22

1. The Nuclear Regulatory Commission (the Commission or the NRC) having found that:
 - A. The application for an amendment filed by the Pennsylvania Power & Light Company dated May 3, 1984, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the regulations of the Commission;
 - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes in paragraph 2.D. of the Facility Operating License No. NPF-22 to read as follows:
 - D. PP&L shall fully implement and maintain in effect all provisions of the Commission approved physical security, guard training and qualification, and safeguards contingency plans, including amendments made pursuant to the authority of 10 CFR 50.54(p). The approved plans, which contain Safeguards Information as described in 10 CFR 73.21, are collectively entitled:

"Susquehanna Steam Electric Station Physical Security Plan",
Change A, dated July 31, 1978 (transmittal letter dated

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July 31, 1978); Change B, dated February 15, 1979 (transmittal letter dated February 15, 1979); Change C, dated August 15, 1979 (transmittal letter dated August 23, 1979); Change D, dated September 28, 1979 (transmittal letter dated October 8, 1979); Change E, dated May 22, 1980 (transmittal letter dated July 11, 1980); Change F, dated March 27, 1981 (transmittal letter dated April 8, 1981); Change G, (Safeguards Contingency Plan Chapter 11) dated May 29, 1981 (transmittal letter dated June 5, 1981); Change H, (Safeguards Contingency Plan Chapter 11), dated June 26, 1981 (transmittal letter dated June 29, 1981); Change I, dated March 19, 1982 (transmittal letter dated March 26, 1982); Change J, dated April 1, 1982 (transmittal letter dated April 23, 1982); Change K, dated May 4, 1982 (transmittal letter dated May 5, 1982); Change L, dated July 9, 1982 (transmittal letter dated July 13, 1982); Change M, dated October 15, 1982 (transmittal letter dated October 25, 1982); Change N, dated April 25, 1983 (transmittal letter dated May 6, 1983 as amended by letter of October 26, 1983); Change O, dated June 15, 1983 (transmittal letter dated June 16, 1983); Change P, dated June 24, 1983 (transmittal letter dated June 27, 1983) Change Q, dated November 30, 1983 (transmittal letter dated December 2, 1983); Change R, dated January 31, 1984 (transmittal letter dated February 21, 1984); Change S, no date (transmittal letter dated May 3, 1984); and "Susquehanna Security Training and Qualification Plan", Change A, dated August 26, 1981 (transmittal letter dated September 1, 1981); Change B, dated February 3, 1983 (transmittal letter dated February 11, 1983 as amended by letter of October 26, 1983).

2. This amendment is effective as of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION


Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

Date of Issuance: **DEC 20 1984**

July 31, 1978); Change B, dated February 15, 1979 (transmittal letter dated February 15, 1979); Change C, dated August 15, 1979 (transmittal letter dated August 23, 1979); Change D, dated September 28, 1979 (transmittal letter dated October 8, 1979); Change E, dated May 22, 1980 (transmittal letter dated July 11, 1980); Change F, dated March 27, 1981 (transmittal letter dated April 8, 1981); Change G, (Safeguards Contingency Plan Chapter 11) dated May 29, 1981 (transmittal letter dated June 5, 1981); Change H, (Safeguards Contingency Plan Chapter 11), dated June 26, 1981 (transmittal letter dated June 29, 1981); Change I, dated March 19, 1982 (transmittal letter dated March 26, 1982); Change J, dated April 1, 1982 (transmittal letter dated April 23, 1982); Change K, dated May 4, 1982 (transmittal letter dated May 5, 1982); Change L, dated July 9, 1982 (transmittal letter dated July 13, 1982); Change M, dated October 15, 1982 (transmittal letter dated October 25, 1982); Change N, dated April 25, 1983 (transmittal letter dated May 6, 1983 as amended by letter of October 26, 1983); Change O, dated June 15, 1983 (transmittal letter dated June 16, 1983); Change P, dated June 24, 1983 (transmittal letter dated June 27, 1983) Change Q, dated November 30, 1983 (transmittal letter dated December 2, 1983); Change R, dated January 31, 1984 (transmittal letter dated February 21, 1984); Change S, no date (transmittal letter dated May 3, 1984); and "Susquehanna Security Training and Qualification Plan", Change A, dated August 26, 1981 (transmittal letter dated September 1, 1981); Change B, dated February 3, 1983 (transmittal letter dated February 11, 1983 as amended by letter of October 26, 1983).

2. This amendment is effective as of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION
Original signed by

Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

Date of Issuance: **DEC 20 1984**

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UNITED STATES
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DEC 20 1984

SAFETY EVALUATION

AMENDMENT NO. 4 TO NPF-22

SUSQUEHANNA STEAM ELECTRIC STATION, UNIT 2

Introduction

The licensee in a letter dated May 3, 1984, proposed an amendment to license condition 2.D. of the operating license for Susquehanna Steam Electric Station, Unit 2 to incorporate Change S into the Physical Security Plan. Change S involves changes to the screening program for contractor personnel desiring unescorted access to the protected and vital areas of the site.

Evaluation

Change S to Physical Security Plan

By letter dated March 1, 1984, PP&L submitted for staff review and approval a revision to their physical security plan involving changes to the screening program for contractor personnel desiring unescorted access to the protected and vital areas of the site. By letter dated May 3, 1984, PP&L requested the change to be incorporated into the Operating Licenses for Susquehanna Units 1 and 2. 10 CFR 73.55 requires that access to protected and vital areas be controlled. Access to vital areas is limited to individuals who are authorized access to vital equipment and who require such access to perform their duties. Authorization for unescorted access is based on employee screening criteria contained in ANSI 18.17-1973 and a staff Review Guideline #1 dated November 26, 1977 entitled "Screening of Individuals Granted Unescorted Access to the protected Area." ANSI 18.17-1983 recommends that screening be based on a program which consists of a

¹There are no NRC regulations that require screening as a prerequisite to unescorted access. The basis for inclusion of clearance programs in physical security plans is contained in a Statement of Considerations that accompanied the publication of 10 CFR 73.55.

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background investigation, an examination by a licensed psychiatrist to identify aberrant behavior and continued observation by supervisors for aberrant behavior. Review Guideline #1 provides that authorization may be based on reliability established by three continuous years of trust-worthy employment determined by a review of the individual's employment record. In addition, staff guidance has been provided for the granting of interim access authorizations for workers that would be on site only for a short period of time. This procedure is not as extensive as that set forth in ANSI 18.17 but is accompanied by certain restrictions under which access to vital areas is permitted. The licensee has complied with all current requirements and staff guidance regarding granting access to contractors to protected and vital areas.

The licensee has proposed to add an interim clearance program to the Susquehanna Physical Security Plan to allow granting of unescorted access to contractor personnel while a permanent clearance is being processed. The interim clearance would be applied only to contractor employees who have previously been awarded a "Temporary" clearance and who satisfied certain additional criteria including psychological evaluation and the supervisor's recommendation based on the individual past behavior as noted under the licensee's Continual Behavior Observation Program.

The licensee is also proposing to change the adjudication process for contractor clearances to permit the Director of Corporate Security to grant a clearance even though all information on the background investigator has not been received - provided that reasonable attempts have been made to obtain the information, or the missing data has been indirectly verified.

The proposed program for granting interim clearances essentially extends PP&L's temporary clearance until a permanent clearance can be processed, provided that the employee's behavior up to that time justified a position of trust (as determined through the licensee's Continual Behavior Observation Program). Accordingly, this change is only an extension of an ongoing program and no additional risk is introduced. The staff supports this change.

While there is no published guidance regarding granting a clearance with an incomplete background investigation, the staff's proposed rule for access authorization would permit granting a clearance before criminal history information has been obtained (because of long delay time involved). Under the licensee's proposal, attempts to obtain the missing information would have to be documented, or, for missing information verified by other means, only a small portion of the investigation could be involved. Since the entire matter of denial criteria is left to the discretion of the utility, it seems reasonable to also allow discretion to be used in these cases. Accordingly, the staff supports this change.

On the bases of the above, the staff concludes that the proposed changes to the Physical Security Plan are consistent with the intent of current regulatory requirements and published guidance, and are therefore acceptable.

Environmental Considerations

Changes to the License Condition 2.D. in this amendment related solely to safeguards matters and do not involve any significant construction impacts. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(12). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

Conclusion

We have concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Dated: **DEC 20 1984**