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## SAFEGUARDS INFORMATION

MAR 1 5 2002

Mr. Samuel J. Collins Director, Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission One White Flint, North Room 5 DC, Mail Stop O-5 E7 11555 Rockville, Pike Rockville, MD 20852

## SUSQUEHANNA STEAM ELECTRIC STATION **RESPONSE TO THE FEBRUARY 25, 2002 NRC ORDER MODIFYING LICENSES EA-02-026** PLA-5453

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

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- 1. Letter, Samuel J Collins (USNRC) to R. G. Byram (PPL), "Issuance of Order for Interim Safeguards and Security Compensatory Measures For - Susquehanna Steam Electric Station, Units 1 and 2", dated February 25, 2002.
- 2. Letter, Ralph E. Beedle (NEI) to Chief Nuclear Officers dated March 8, 2002.
- 3. Letter, Samuel J Collins (USNRC) to Ralph E. Beedle (NEI), "Review of Industry Guidance Related to Interim Safeguards and Security Compensatory Measures", dated March 11, 2002.

By letter dated February 25, 2002 [Reference 1], the Nuclear Regulatory Commission (NRC) issued an Order Modifying Licenses (Effective Immediately) for the Susquehanna Steam Electric Station (SSES) Units 1 & 2. The Commission's Order modified the current Operating Licenses [NPF-14 & NPF-22] for the facilities to require compliance with specified interim safeguards and security compensatory measures in order to prudently address the current generalized high-level threat environment. Within the Order, the Commission recognized that licensees may have already initiated many of the measures set forth. The Commission also recognized that some measures may not be possible or necessary at some sites, or may need to be tailored to specifically accommodate the specific circumstances existing at the licensee's facility to achieve the intended objectives and avoid any unforeseen effect on safe operation.

> WHEN ATTACHMENT 1 IS SEPARATED FROM THIS DOCUMENT, HANDLE THIS DOCUMENT AS DECONTROLLED

PPL continues to maintain the effectiveness of security measures taken in response to the events of September 11, 2001 and continues to implement the objectives of Security Level III described in NRC Information Notice 98-35. In accordance with the Order at C.1., Attachment 1 to this letter provides PPL's schedule for achieving compliance with each requirement described in the Order [Attachment], and provides notification to the Commission, as required by the Order at A.1., that PPL has initiated implementation of the compensatory measures and will complete implementation no later than August 31, 2002 absent relief by the Commission of any specific requirement.

PPL, in preparing it's response, relied on NEI Guidance dated March 8, 2002 [Reference 2], which has been reviewed and endorsed by the NRC [Reference 3] as an acceptable means of implementing the interim compensatory measures. Certain compensatory measures, B.2.a.(1), B.2.a.(2), B.2.b. and B.4.e., require significant analyses which will require greater than 20 days to determine the appropriate actions. For these interim compensatory measures, PPL has provided its response and a proposed schedule consistent with Enclosure 2 to the NEI Guidance. PPL has requested by separate letter [Attachment 2], an extension of time to supplement the response to the Order for these specific compensatory measures.

Consistent with the provisions of the Order at B.1., PPL has provided justification for seeking relief from those interim compensatory measures for which PPL has determined that the requirements do not apply and thus are unnecessary in its specific circumstances.

PPL has determined that implementation of the interim compensatory measures will not adversely impact safe operation and will not cause PPL to be in violation of any provisions of any Commission regulation or the facility licenses.

In accordance with the Order at C.2., PPL will report to the Commission when full compliance is achieved with the interim compensatory measures described in the Order [Attachment]. In accordance with the Commissions regulations, PPL's responses to Conditions B.1., B.2., C.1., and C.2. of the Order are being submitted consistent with the specific requirements of 10 CFR 50.4 and 10 CFR 73.21.

If you have any questions regarding this submittal, please contact Mr. Terry L. Harpster, Manager, Nuclear Regulatory Affairs at (610) 774-7504.

Sincerely. Bynam

Attachments (2) copy: NRC Region I Mr. S. L. Hansell, NRC Sr. Resident Inspector Mr. T. G. Colburn, Sr. NRC Project Manager Mr. G. M. Tracy, USNRC

## Safeguards Information