

**Bryce L. Shriver**  
Senior Vice President and  
Chief Nuclear Officer

**PPL Susquehanna, LLC**  
769 Salem Boulevard  
Berwick, PA 18603  
Tel. 570.542.3120 Fax 570.542.1504  
blshriver@pplweb.com



JUL 18 2003

Mr. Samuel J. Collins  
Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**SUSQUEHANNA STEAM ELECTRIC STATION  
ANSWER IN RESPONSE TO APRIL 29, 2003, ORDER FOR  
COMPENSATORY MEASURES RELATED TO TRAINING  
ENHANCEMENTS ON TACTICAL AND FIREARMS PROFICIENCY  
AND PHYSICAL FITNESS APPLICABLE TO ARMED NUCLEAR  
POWER PLANT SECURITY FORCE PERSONNEL (EA-03-039)  
PLA-5630**

---

Dear Mr. Collins:

This letter was originally issued on June 2, 2003. However, PPL recently identified that the required oath or affirmation was inadvertently omitted. We are therefore resubmitting our response to satisfy this requirement; the content otherwise remains unchanged.

Section IV of the April 29, 2003, Order for Compensatory Measures Related to Training Enhancements on Tactical and Firearms Proficiency and Physical Fitness Applicable to Armed Nuclear Power Plant Security Force Personnel (EA-03-039) ("Order") states that, in accordance with 10 CFR §2.202, a licensee must submit an answer to the Order and may request a hearing on the Order within 35 days of the date of the Order.

This letter constitutes PPL Susquehanna, LLC's answer (pursuant to 10 CFR §2.202 and Section IV of the Order) and response (pursuant to 10 CFR 50.4 and Section III B.1, B.2 and C.1 of the Order.) PPL Susquehanna, LLC consents to the Order and does not request a hearing. PPL Susquehanna, LLC fully intends to comply with the Order and the schedule for achieving compliance.

However, because the NRC has used force-on-force testing as a standard by which compliance with the DBT was evaluated and because the tactics and capabilities associated with the DBT influence the training prescribed in the Order, PPL Susquehanna, LLC requests that the NRC provide a clear definition of the objectives and criteria for force on force exercises so that appropriate revisions can be made to safeguards contingency plans, security plans and security officer training and qualification plans.

Specifically, PPL Susquehanna, LLC needs a clear explanation of the purpose of the force-on-force exercise (e.g., is the purpose of force-on-force exercises for security officer training, or to evaluate licensee compliance with the Design Basis Threat?). Similarly, the success criteria for the force-on-force exercise needs to be established (e.g., is the criterion prevention of a large

IE53

offsite release, which would be consistent with the basis for risk-informing NRC regulations, or some other criteria?). Finally, if a force-on-force exercise is going to be used as a performance test of the licensee's ability to protect against the Design Basis Threat, a clear definition of adversary rules of engagement and adversary tactics is needed to provide appropriate predictability and stability in the regulatory program. Absent these clarifications, the standard by which licensee performance will be measured will continue to be a constantly moving target which is counter to the Commission's Principles of Good Regulation.

To enable PPL Susquehanna, LLC to meet the compliance dates specified in the Order, the requested clarifications are needed as soon as possible. If the clarifications cannot be provided by October 1, 2003, we respectfully request that the Director, Nuclear Reactor Regulation extend the dates for full implementation of the Order on a day-for-day basis until such clarifications are provided.

PPL Susquehanna, LLC also confirms its understanding that the Commission intends to exercise enforcement discretion to accommodate issues which may arise as licensees, in good faith, take reasonable actions to implement the specific requirements of this Order. We further understand that the Commission will exercise enforcement discretion for the period necessary to resolve such issues and to integrate the requirements of this Order with the orders issued February 25, 2002, as well as with other pertinent regulatory requirements, and our safeguards contingency plans, security plans and security officer training and qualification plans.

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

Executed on: 7/18/03

Respectfully submitted,



Bryce L. Shriver

Sr. Vice President and Chief Nuclear Officer

copy: NRC Region I  
Mr. R. V. Guzman, NRC Project Manager  
Mr. S. Hansell, NRC Sr. Resident Inspector  
Mr. R. Janati, DEP/BRP