

## SAFEGUARDS INFORMATION

October 28, 2004

Mr. Bryce L. Shriver  
Senior Vice President and Chief Nuclear Officer  
PPL Susquehanna, LLC  
769 Salem Boulevard  
Berwick PA 18603

SUBJECT: SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2 -  
ADMINISTRATIVE CHANGE TO FACILITY OPERATING LICENSES IN  
CONJUNCTION WITH THE COMMISSION ORDER EA-03-086 REGARDING  
REVISED DESIGN BASIS THREAT (DBT) AND REVISIONS TO PHYSICAL  
SECURITY PLAN, TRAINING AND QUALIFICATIONS PLAN, AND  
SAFEGUARDS CONTINGENCY PLAN (TAC NOS. MC2979 AND MC2980)

Dear Mr. Shriver:

By letter dated April 28, 2004, PPL Susquehanna, LLC submitted a supplemental response in accordance with Order EA-03-086, "Order Requiring Compliance with Revised Design Basis Threat," dated April 29, 2003, (DBT Order) for Susquehanna Steam Electric Station, Units 1 and 2. Section III.A of the Order requires licensees to revise their physical security plans (PSP), training and qualification plans (T&Q Plans), and safeguards contingency plans (SCPs) to provide protection against the revised DBT set forth in Attachment 2 to the DBT Order. These revised plans, along with an implementation schedule, were required to be submitted to the Nuclear Regulatory Commission (NRC or the Commission) for review and approval no later than April 29, 2004.

In the revised security plans for Susquehanna Steam Electric Station, Units 1 and 2, you included information related to the independent spent fuel storage installation (ISFSI) co-located at the site. The DBT Order did not require this information to be included in the revised security plans for Susquehanna Steam Electric Station, Units 1 and 2. However, Order EA-02-104, "Compensatory Measures for Dry Independent Spent Fuel Storage Installation," dated October 16, 2002, required licensees to comply with the requirements, set forth in an attachment to the Order, that described the compensatory measures necessary to protect the ISFSI as a result of the heightened threat environment following the September 11, 2001, terrorist attacks. On September 9, 2004, the NRC staff requested that you clarify whether the

**NOTICE: Enclosure 2 contains Safeguards Information.  
Upon separation from Enclosure 2, this letter and  
Enclosure 1 are DECONTROLLED.**

SAFEGUARDS INFORMATION

information provided in the revised security plan for Susquehanna Steam Electric Station, Units 1 and 2 related to the ISFSI, modified the response you provided to Order EA-02-104. By letter dated September 23, 2004, you indicated that the actions you have taken in response to Order EA-02-104 remain essentially unchanged and therefore, there is no decrease in effectiveness of the protective measures in place for the ISFSI.

The NRC staff's review of the PSP, SCP, and T&Q Plans submitted in your letter dated April 28, 2004, as supplemented on July 7, July 26, August 9, and October 8, 2004, has focused on ensuring the necessary programmatic elements are contained in these plans in order to provide high assurance that activities involving special nuclear material are not inimical to the common defense and security and do not constitute an unreasonable risk to the public health and safety.

The NRC staff has determined that these plans contain the necessary programmatic elements that, when effectively implemented, will provide the required high assurance that the Susquehanna Steam Electric Station, Units 1 and 2 will be protected against the revised DBT. The NRC staff, therefore, approves the PSP, SCP, and T&Q Plan for Susquehanna Steam Electric Station, Units 1 and 2. However, ultimately, the effectiveness of these plans will be judged on your ability to meet regulatory requirements through facility implementing procedures and site practices. As such, your facility implementing procedures and practices will continue to be subject to future NRC review and inspection, including NRC-conducted force-on-force exercises.

In addition, the NRC staff noted that your PSP included alternatives to certain requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Section 73.55. In each case, the NRC staff found that the alternative measures provide an equivalent level of protection to that of the associated requirement and meet the high assurance objective of 10 CFR 73.55(a). The NRC staff, therefore, approves the alternatives shown in the table below. The NRC staff's evaluation is discussed further in the enclosed Safety Evaluation (SE).

<b>Approved Alternatives to the Requirements of 10 CFR Part 73</b>			
<b>SE Section</b>	<b>PSP Section</b>	<b>Alternative to 10 CFR</b>	<b>Description</b>
3.6.2	6.2	73.55(c)(3)	Isolation Zones
3.9.4.3	9.4.3	73.55(d)(4)	Protected Area (PA) vehicle search requirements
3.9.4.4	9.4.4	73.55(d)(1)	PA personnel search requirements
3.9.5.2	9.5	73.55(d)(1) 73.55(d)(4)	PA access control requirements
3.10.1	10.1	73.55(c)(5)	PA illumination requirements
3.13.1	14.1	73.55(c)(1) 73.55(d)(7)(i)(B)	Temporary reclassification of Vital Areas to PA status (devitalization)

Mr. Shriver

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Finally, consistent with Order EA-03-086, conforming administrative license changes to Facility Operating Licenses (FOLs) are required to ensure implementation of the DBT Order requirements. Therefore, administrative license changes to FOL Nos. NPF-14 and NPF-22 are being made to incorporate the reference to the revised **Physical Security Plan, Safeguards Contingency Plan, and Training and Qualification Plans** required by the DBT Order. These changes comply with the standards and requirements of the Atomic Energy Act of 1954, as amended, and the Commission's rules and regulations set forth in 10 CFR Chapter I.

Please replace the enclosed page to your FOLs as indicated in the Enclosure.

A copy of our SE (designated as Safeguards Information), is also enclosed.

Sincerely,

**/RA/**

John A. Nakoski, Chief  
Security Plan Review Team  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-387 and 50-388

Enclosures: 1. Administrative Change to FOL Nos. NPF-14 and NPF-22  
2. Safety Evaluation (**Safeguards Information**)

cc w/encl 1 only: See Mailing List 1

cc w/encls 1 and 2: Mr. Roland Ferentz, Manager, Nuclear Security

Mr. Shriver

-3-

Finally, consistent with Order EA-03-086, conforming administrative license changes to Facility Operating Licenses (FOLs) are required to ensure implementation of the DBT Order requirements. Therefore, administrative license changes to FOL Nos. NPF-14 and NPF-22 are being made to incorporate the reference to the revised **Physical Security Plan, Safeguards Contingency Plan, and Training and Qualification Plans** required by the DBT Order. These changes comply with the standards and requirements of the Atomic Energy Act of 1954, as amended, and the Commission's rules and regulations set forth in 10 CFR Chapter I.

Please replace the enclosed page to your FOLs as indicated in the Enclosure.

A copy of our SE (designated as Safeguards Information), is also enclosed.

Sincerely,

**/RA/**

John A. Nakoski, Section Chief,  
Security Plan Review Team,  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-387 and 50-388

Enclosures: 1. Administrative Change to FOL Nos. NPF-14 and NPF-22  
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cc w/encl 1 only: See Mailing List 1

cc w/encls 1 and 2: Mr. Roland Ferentz, Manager, Nuclear Security

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Accession No.: ML043120002

\*See Previous Concurrence

OFFICE	SPRT/TL	SPRT/PM	SPRT/LA	SPRT/PL	OGC	NSIR/SC	NRR/SC
NAME	PPeduzzi*	MChernoff*	CHawes*	JPeralta	RBaum	SMorris	JNakoski
DATE	10/14/04	10/15/04	10/15/04	10/16/04	10/22/04	10/28/04	10/28/04

OFFICIAL RECORD COPY

Susquehanna Steam Electric Station, Unit Nos. 1 and 2

cc w/o encl.:

Richard L. Anderson  
Vice President - Nuclear Operations  
PPL Susquehanna, LLC  
769 Salem Blvd., NUCSB3  
Berwick, PA 18603-0467

Aloysius J. Wrape, III  
General Manager - Nuclear Assurance  
PPL Susquehanna, LLC  
Two North Ninth Street, GENPL4  
Allentown, PA 18101-1179

Terry L. Harpster  
General Manager - Plant Support  
PPL Susquehanna, LLC  
769 Salem Blvd., NUCSA4  
Berwick, PA 18603-0467

Robert A. Saccone  
General Manager - Nuclear Engineering  
PPL Susquehanna, LLC  
769 Salem Blvd., NUCSB3  
Berwick, PA 18603-0467

Rocco R. Sgarro  
Manager - Nuclear Regulatory Affairs  
PPL Susquehanna, LLC  
Two North Ninth Street, GENPL4  
Allentown, PA 18101-1179

Walter E. Morrissey  
Supervising Engineer  
Nuclear Regulatory Affairs  
PPL Susquehanna, LLC  
769 Salem Blvd., NUCSA4  
Berwick, PA 18603-0467

Michael H. Crowthers  
Supervising Engineer  
Nuclear Regulatory Affairs  
PPL Susquehanna, LLC  
Two North Ninth Street, GENPL4  
Allentown, PA 18101-1179

Dale F. Roth  
Manager - Quality Assurance  
PPL Susquehanna, LLC  
769 Salem Blvd., NUCSB2  
Berwick, PA 18603-0467

Herbert D. Woodeshick  
Special Office of the President  
PPL Susquehanna, LLC  
634 Salem Blvd., SSO  
Berwick, PA 18603-0467

Bryan A. Snapp, Esq  
Assoc. General Counsel  
PPL Services Corporation  
Two North Ninth Street, GENTW3  
Allentown, PA 18101-1179

Supervisor - Document Control Services  
PPL Susquehanna, LLC  
Two North Ninth Street, GENPL4  
Allentown, PA 18101-1179

Richard W. Osborne  
Allegheny Electric Cooperative, Inc.  
212 Locust Street  
P. O. Box 1266  
Harrisburg, PA 17108-1266

Director - Bureau of Radiation Protection  
Pennsylvania Department of  
Environmental Protection  
P. O. Box 8469  
Harrisburg, PA 17105-8469

Senior Resident Inspector  
U.S. Nuclear Regulatory Commission  
P. O. Box 35, NUCSA4  
Berwick, PA 18603-0035

Regional Administrator, Region 1  
U.S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406

Susquehanna Steam Electric Station,  
Unit Nos. 1 and 2

cc w/o encl.:

Board of Supervisors  
Salem Township  
P. O. Box 405  
Berwick, PA 18603-0035

Dr. Judity Johnsrud  
National Energy Committee  
Sierra Club  
443 Orlando Avenue  
State College, PA 16803

Mr. Bryce L. Shriver  
Senior Vice President  
and Chief Nuclear Officer  
PPL Susquehanna, LLC  
769 Salem Boulevard  
Berwick, PA 188603-0467

PPL SUSQUEHANNA, LLC

DOCKET NO. 50-387

SUSQUEHANNA STEAM ELECTRIC STATION, UNIT 1

ADMINISTRATIVE LICENSE CHANGE TO FACILITY OPERATING LICENSE

License No. NPF-14

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. Consistent with Order EA-03-086, "Order Requiring Compliance with Revised Design Basis Threat," (DBT Order), issued on April 29, 2003, conforming administrative license changes to Facility Operating Licenses (FOLs) are required to ensure implementation of the DBT Order requirements. Therefore, an administrative license change to FOL No. 14 is being made to incorporate the reference to the revised **Physical Security Plan, Safeguards Contingency Plan, and Training and Qualification Plans** required by the DBT Order. These changes comply with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and 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 rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this administrative license change 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 administrative license change 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 administrative license change is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the FOL is changed, as indicated in the Attachment.
3. This administrative license change is effective as of its date of issuance and shall be implemented on or before October 29, 2004.

FOR THE NUCLEAR REGULATORY COMMISSION

*/RA/*

John A. Nakoski, Chief  
Security Plan Review Team  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Attachment: Changes to the FOL

Date of Issuance: October 28, 2004



CHANGES TO FACILITY OPERATING LICENSE NO. NPF-14

DOCKET NO. 50-387

Replace the following page of the Facility Operating License NPF-14 with the attached revised page as indicated. The revised page is identified by revision date and contains marginal lines indicating the area of change.

Remove Page

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Insert Page

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(32) Emergency Service Water System (Section 6.3.4, SSER #4)

Prior to startup following the first refueling outage, the operating licensee shall complete design modifications to the emergency service water (ESW) system, approved by the staff, to eliminate single failure in the ESW system which leads to the need for an uncooled residual heat removal (RHR) pump.

(33) The Additional Conditions contained in Appendix C, as revised through Amendment No. 188, are hereby incorporated into this license. PPL Susquehanna, LLC shall operate the facility in accordance with the Additional Conditions.

D. The operating licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plan, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Physical Security Plan, Training and Qualification Plan, Safeguards Contingency Plan and Security and Contingency Plan for Independent Spent Fuel Storage Facility," and was submitted October 8, 2004.

E. Exemptions from certain requirements of Appendices G and H to 10 CFR Part 50 are described in the Safety Evaluation Report and Supplements 1 and 2 to the Safety Evaluation Report. In addition, an exemption was requested until receipt of new fuel for first refueling from the requirements for criticality monitors in the spent fuel pool area, 10 CFR Part 70.24. Also, an exemption was requested from the requirements of Appendix J of 10 CFR Part 50 for the first fuel cycle when performing local leak rate testing of Residual Heat Removal (RHR) relief valves in accordance with Technical Specification 4.6.1.2. This latter exemption is described in the safety evaluation of License Amendment No. 13. These exemptions are authorized by law and will not endanger life or property or the common defense and security and are otherwise in the public interest and have been granted pursuant to 10 CFR 50.12. Except as here exempted, the facility will operate, to the extent authorized herein, in conformity with the application, as amended, and the rules and regulations of the Commission and the provisions of the Act.

F. This license is subject to the following additional condition for the protection of the environment:

Before engaging in additional construction or operational activities which may result in a significant adverse environmental impact that was not evaluated or that is significantly greater than that evaluated in the Final Environmental Statement and its

PPL SUSQUEHANNA, LLC

DOCKET NO. 50-388

SUSQUEHANNA STEAM ELECTRIC STATION, UNIT 2

ADMINISTRATIVE LICENSE CHANGE TO FACILITY OPERATING LICENSE

License No. NPF-22

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. Consistent with Order EA-03-086, "Order Requiring Compliance with Revised Design Basis Threat," (DBT Order), issued on April 29, 2003, conforming administrative license changes to Facility Operating Licenses (FOLs) are required to ensure implementation of the DBT Order requirements. Therefore, an administrative license change to FOL No. NPF-22 is being made to incorporate the reference to the revised **Physical Security Plan, Safeguards Contingency Plan, and Training and Qualification Plans** required by the DBT Order. These changes comply with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and 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 rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this administrative license change 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 administrative license change 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 administrative license change is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the FOL is changed, as indicated in the attachment.
3. This administrative license change is effective as of its date of issuance and shall be implemented on or before October 29, 2004.

FOR THE NUCLEAR REGULATORY COMMISSION

*/RA/*

John A. Nakoski, Chief  
Security Plan Review Team  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Attachment: Changes to the FOL

Date of Issuance: October 28, 2004

CHANGES TO FACILITY OPERATING LICENSE NO. NPF-22

DOCKET NO. 50-388

Replace the following page of the Facility Operating License NPF-22 with the attached revised page as indicated. The revised page is identified by revision date and contains marginal lines indicating the area of change.

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- 2. D. The operating licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plan, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Physical Security Plan, Training and Qualification Plan, Safeguards Contingency Plan and Security and Contingency Plan for Independent Spent Fuel Storage Facility," and was submitted October 8, 2004.
- E. Reporting to the Commission:  
  
PPL Susquehanna, LLC shall report any violations of the requirements contained in Section 2, Items C(1), C(3) through C(16) of this license within twenty-four (24) hours. Initial notification shall be made in accordance with the provisions of 10 CFR 50.72 with written followup in accordance with the procedures described in 10 CFR 50.73(b), (c), and (e).
- F. PPL Susquehanna, LLC shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.
- G. This license is effective as of the date of issuance and shall expire at midnight on March 23, 2024.

FOR THE NUCLEAR REGULATORY COMMISSION

Original signed by Darrell G. Eisenhut  
for Harold R. Denton

Harold R. Denton, Director  
Office of Nuclear Reactor Regulation

Attachments:

- 1. Attachment 1
- 2. Attachment 2
- 3. Appendix A - Technical Specifications (NUREG-1042)
- 4. Appendix B - Environmental Protection Plan

Date of Issuance: March 23, 1984

Amendment No. 462  
Amended by letter dated October 28, 2004