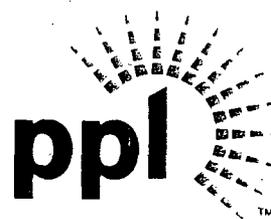


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PR 50 and 52
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Office of the Secretary
ATTN: Rulemakings and Adjudications Staff
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

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October 26, 2009 (10:00am)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

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**SUSQUEHANNA STEAM ELECTRIC STATION
COMMENTS ON THE PROPOSED RULEMAKING,
ENHANCEMENTS TO EMERGENCY PREPAREDNESS
REGULATIONS (74 Fed. Reg. 23254)
PLA-6575**

Docket Nos. 50-387
and 50-388

PPL Susquehanna, LLC (PPL) appreciates the opportunity to comment on the proposed rulemaking and associated NRC and FEMA guidance regarding enhancements to emergency preparedness regulations. In that regard, PPL hereby supports the comments submitted by the Nuclear Energy Institute in and under cover of letter, dated October 19, 2009. Additionally PPL would like to offer the following comments.

Protection of Onsite Responders

The term "operations procedure" as used in NSIR/DPR-ISG-01, "Interim Staff Guidance Emergency Planning for Nuclear Power Plants," Rev. 0, Section IV.F should be replaced with the term "procedures" as licensee actions in response to a security event may be contained in other procedures such as Emergency Preparedness procedures. Licensees should retain the flexibility to determine based on established programs which procedures will contain the information necessary to respond to security events.

Also, PPL believes that the ISG should not prescribe how and what information must be contained in the Plant Page Announcements (ISG, Section IV.F) during a security event. Licensees should maintain the latitude to determine the method and the content of informing Station personnel of a hostile-based action as the specific situation will dictate the information to be shared and the best means of communication to Station personnel. For example, there may situations in which the plant page announcement should be short and to the point directing Station personnel to take cover or evacuate, and communications to specific plant staff be handled by other communication means such as hand held radios.

Template = SECY-067

DS 10

Exercise Issues

PPL disagrees with the guidance in ISG, Section IV.G to conduct biennial exercise scenarios with an initial classification of a General Emergency or one in which there is no radiological release. During exercises the objective is to provide multiple classifications, notifications, dose projections, and at least one protective action recommendation to allow not only onsite responders to demonstrate adequate implementation of the Emergency Plan, but also to afford offsite responders practice in developing action plans and implementing measures to alert, notify, and protect the public. This aspect is especially important for local community responders who participate in a full scale exercise only once every two years. Developing an exercise scenario that skips directly to a General Emergency or one in which there is no radiological release may undermine maintenance of key skills of all emergency responders. Furthermore, if scenarios are not to be used within three years of a biennial exercise, then the biennial exercises in a six year cycle may become very predictable (e.g. hostile-based action scenario, followed by a radiological release scenario, followed by a scenario with no radiological release, and then repeat of the cycle).

Additionally, ISG Section IV.G suggests that the NRC will review and approve all biennial exercise scenarios. Based upon discussions at Emergency Preparedness Rulemaking public meetings, PPL does not believe that pre-approval is NRC's intent. Moreover, the NRC goes on to state in the ISG that it could require a remedial exercise if (during or after the exercise) NRC and FEMA determine the exercise is not challenging enough. The latter would not make sense if the NRC had pre-approved the exercise scenario. If the intent is not for the NRC to approve biennial exercise scenarios, then the word "approve" should be removed from the rulemaking language.

If you have any questions regarding the comments above, please contact Mr. Michael Crowthers, Manager-Nuclear Regulatory Affairs at (610) 774-7766.



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