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SUBJECT: Documents util organizational & philosophical concepts re independent safety assessment function outlined at 801014 meeting w/VRC. Formation of nuclear safety assessment group proposed.

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PP&L

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NORMAN W. CURTIS
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December 8, 1980

Mr. B. J. Youngblood, Chief
Licensing Branch No. 1
U.S. Nuclear Regulatory Commission
Washington, DC 20555

SUSQUEHANNA SES
NUCLEAR SAFETY ASSESSMENT PLANS
ER 100450 FILE 841-02
PLA-585

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Dear Mr. Youngblood:

On October 14, 1980, a meeting was held between members of our respective staffs to discuss, among other subjects, PP&L's intentions with respect to providing an independent safety assessment function. At that meeting, we presented our organizational and philosophical concepts on safety assessment including the independent safety engineering group function.

This letter serves to formally document those concepts as requested by Mr. R. Stark, your Project Manager for Susquehanna.

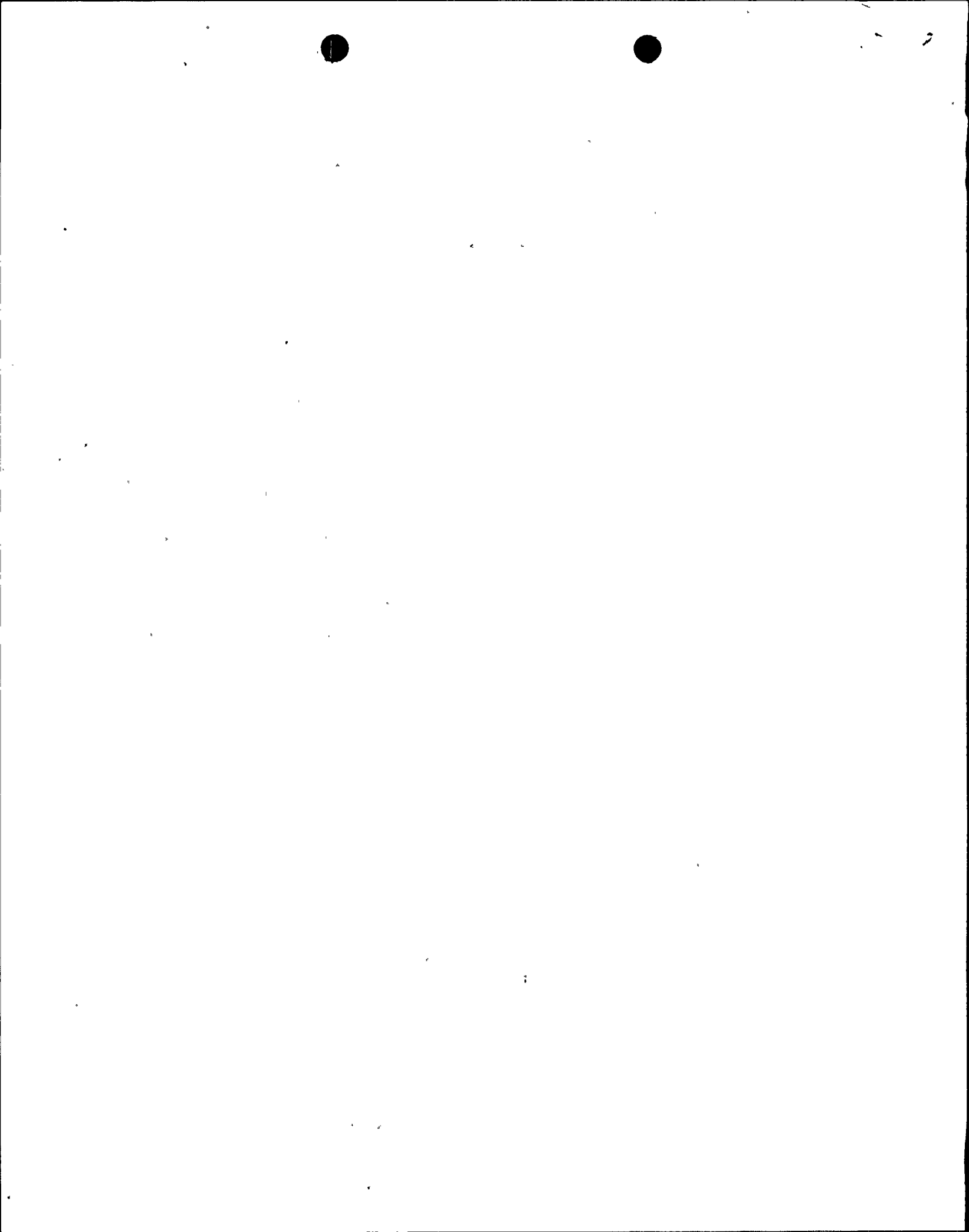
Background

In December 1979, PP&L initiated a program of changes designed to strengthen the Company's current and long term internal management of the construction and operating phases of the Susquehanna nuclear plant. As a result of this program, a singular purpose nuclear department was formed and a new senior executive management position established. A current management organization chart is attached as Exhibit A.

Prior to the issuance of Mr. Denton's letter of May 13, 1980 (SECY-80-242), which described the concept of an Independent Safety Engineering Group (ISEG), PP&L had determined to establish an independent Nuclear Safety Assessment Group (NSAG). This group was invisioned as providing an independent evaluation of all of PP&L's nuclear activities with particular emphasis on assessing the effectiveness and quality of the Company's nuclear operations and related safety programs. Upon further development of this concept, and giving consideration to Mr. Denton's letter and NUREG-0731, it was decided that NSAG would not replace or incorporate the functions of either the on-site or off-site review/audit groups nor would it relieve line management of any of its responsibilities. Additionally, it was decided to include the ISEG function within the bounds of NSAG's charter. The NSAG organization, as shown in Exhibit B, was then formalized.

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Mr. B. J. Younglood
December 8, 1980
Page 2

The following amplifications and clarifications are intended to aid in understanding PP&L's safety assessment and corporate management philosophy.

1. The Corporate Management Committee (CMC), with the exception of the Board of Directors, is the highest level corporate "governance" committee. The CMC, which normally meets one full day per week, overviews Company operations, reviews and/or makes major policy and financial decisions, critically examines all issues having significant public or regulatory impact and provides explicit direction as to the future course of Company activities. The Senior Vice President-Nuclear is a corporate officer and member of CMC.
2. This Senior Vice President-Nuclear position was created because of the need perceived by PP&L executive management to "bring a great depth of experience in nuclear plant operations and maintenance" to the Company's decision making bodies. The responsibilities of the Senior Vice President-Nuclear can be best understood by reiterating his CMC membership. It should be recognized that the Senior Vice President-Nuclear is charged with the same responsibilities for all concerns which touch the Company (e.g. financial, personnel, operations, etc.) as are all other CMC members and in turn, they provide a broad corporate overview of nuclear activities.
3. The Vice President-Nuclear Operations is the corporate officer in the direct management chain for nuclear power production. The Superintendent of Plant Susquehanna reports to this position.
4. The Vice President-Engineering & Construction - Nuclear is the corporate officer responsible for nuclear plant engineering, licensing and project construction.

NSAG Organizational Structure

In establishing the NSAG concept, PP&L executive management desired to charge a single manager with the sole task of assessing the totality of PP&L's nuclear activities. In order for this manager to be effective within PP&L's internal corporate structure, and to assure that NSAG reviews, assessments and recommendations are effectively presented and timely considered, an NSAG presence in the general office was deemed appropriate. Consequently, NSAG was structured with both on-site and off-site sections.

NUREG-0731 conceptualizes the Independent Safety Engineering Group and stipulates review functions. The relevant portion of those review functions are reproduced verbatim in Exhibit C.

Mr. B. J. Youngblood
December 8, 1980
Page 3

Based upon PP&L's internal organization structure and the physical separation between the general office and plant, several of these functions can best be performed in PP&L's general office.

To cite some examples:

- o An assessment of the timeliness, effectiveness and quality of the General Office's response to plant initiated requests.
- o An evaluation to determine the extent to which relevant industry experience is being factored into design considerations.
- o Comparison of Susquehanna operating experience with plants of similar design.

NSAG's general office section will be responsible for the conduct of administrative duties associated with NSAG's plant section. Thus, the on-site section will be able to devote its time to the conduct of its functions with minimum distractions. It is expected that the Shift Technical Advisors (STAs) and NSAG's on-site organization will mutually benefit from frequent exchanges of information and experience.

Giving consideration to the tasks accomplished in the general office and the benefit derived from interaction with the STAs, we believe that the organization shown in Exhibit B more than meets the intent of NUREG-0731. It should be further stated that although our on-site complement is somewhat smaller than that discussed in NUREG-0731 and subsequently in NUREG-0737, our total staffing is in excess of current Nuclear Regulatory Commission guidance.

NSAG Reporting Structure

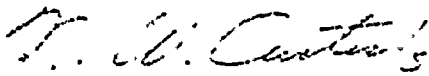
In determining the reporting chain for NSAG, consideration was given to both NUREG-0731 guidance and PP&L's management structure with major emphasis on the goal of achieving an effective NSAG function. The selected reporting structure (Manager-NSAG to Senior Vice President-Nuclear) has NSAG reporting to a senior corporate officer - not in the direct management chain for nuclear power production - who has the experience and knowledge to timely evaluate proposals and who has been granted the authority to make and implement decisions. In view of the fact that the Senior Vice President-Nuclear position was specifically created to provide a depth of nuclear experience and knowledge to PP&L's senior executive management, we believe that any attempt to have NSAG report higher than this level would be detrimental to the safety assessment function. That is, nuclear safety assessment items submitted to a higher level would be referred back to the Senior Vice President-Nuclear at the cost of timely response. It should be noted that NSAG will prepare periodic reports providing a synopsis of their activities and an evaluation of their findings. These reports will be distributed to all members of the Corporate Management Committee to assure a broad corporate overview.

Mr. B. J. Youngblood
December 8, 1980
Page 4

Conclusion

Although we differ in exact implementation details, we believe NSAG, as described herein, meets or exceeds the intent of NUREG-0731 with regard to the ISEG function; therefore, we presume the above is responsive and acceptable. Accordingly, we plan to continue with the implementation of NSAG unless you inform us of the need for further clarification.

Sincerely,



Norman W. Curtis

EXHIBIT C

NUREG-0731 EXTRACT

1. Evaluation for technical adequacy and clarity of all procedures important to the safe operation of the facility.
2. Evaluation of plant operations from a safety perspective.
3. Evaluation of the effectiveness of the quality assurance program.
4. Comparison of the operating experience of the plant and plants.
5. Assessment of plant performance regarding conformance to requirements related to safety.
6. Any other matter involving safe operation of the nuclear power plant that an independent review deems appropriate for consideration.
7. Assessment of plant safety programs.