



**Pennsylvania Power & Light Company**

Two North Ninth Street • Allentown, PA 18101 • 215 / 770-5151

Norman W. Curtis  
Vice President-Engineering & Construction-Nuclear  
215/770-7501

DEC 10 1984

Mr. Stephen M. Goldberg  
U.S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Washington, D.C. 20555

FILE COPY

SUSQUEHANNA STEAM ELECTRIC STATION  
COMMENTS ON ATWS EQUIPMENT QA GUIDANCE  
ER 100450 FILE 842-03  
PLA-2372

Dear Mr. Goldberg:

On November 6, 1984, the NRC published a draft generic letter for comment. The letter provides quality assurance (QA) guidance for non-safety related equipment to be installed pursuant to the Anticipated Transient Without Scram (ATWS) rule (10 CFR 50.62). PP&L's comments on the draft guidance follow.

PP&L has actively participated in industry efforts aimed at resolution of the safety classification issue (safety-related vs. important-to-safety). In this regard, PP&L endorses the approach outlined by the NRC in the ATWS Rule statement of considerations for developing explicit guidance for non-safety-related ATWS equipment which can be justified by the special nature of the equipment. We support the concept of identifying a safety concern and promulgating clear guidelines to address those concerns. The approach taken to develop specific ATWS equipment QA guidance is precisely the approach PP&L would advocate for imposing regulatory constraints on non-safety-related equipment as may be justified to respond to a specific safety concern. We applaud the NRC's concept of developing these requirements on a case by case basis.

In contrast, the non-safety-related ATWS equipment QA guidance proposed in the draft generic letter goes well beyond that justified by the safety concerns identified and the Commission directive which accompanied the ATWS Rule. Practically, the proposed QA guidance does not represent a significant relaxation of the imposed requirements for safety-related equipment. For ATWS equipment, which is installed to respond to extremely improbable circumstances beyond the plant design basis, classification of the equipment as non-safety-related is clearly appropriate. Imposition of this classification should be extended to QA requirements. Only for limited exceptions, if any, should requirements beyond normal utility practice be imposed. The NRC staff found as a result of plant visits that utility practices for non-safety-related equipment would be adequate for the ATWS equipment. The QA guidance in the draft generic letter goes well beyond the scope justified.

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 Internal Security - Communist Section, New York Office, dated  
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SSES PLA-2372  
ER 100450 FILE 842-03  
Mr. Stephen M. Goldberg

We request that the proposed generic letter be revised to be consistent with the findings of the NRC staff and the vanishingly small probability of occurrence of a circumstance requiring reliance on the ATWS equipment. The resulting generic letter should not include numerous, specific QA requirements in excess of normal utility practice as the present draft does.

Sincerely,



N. W. Curtis  
Vice President-Engineering & Construction-Nuclear

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DOCKET NO(S). 50-387/388  
Mr. Norman W. Curtis, Vice President  
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SUBJECT: Susquehanna Steam Electric Station, Units 1 and 2

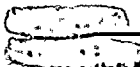
The following documents concerning our review of the subject facility are transmitted for your information.

- Notice of Receipt of Application, dated \_\_\_\_\_.
- Draft/Final Environmental Statment, dated \_\_\_\_\_.
- Notice of Availability of Draft/Final Environmental Statement, dated \_\_\_\_\_.
- Safety Evaluation Report, or Supplement No. \_\_\_\_\_, dated \_\_\_\_\_.
- Notice of Hearing on Application for Construction Permit, dated \_\_\_\_\_.
- Notice of Consideration of Issuance of Facility Operating License, dated \_\_\_\_\_.
- Monthly Notice; Applications and Amendments to Operating Licenses Involving no Significant Hazards Considerations, dated October & November 1984
- Application and Safety Analysis Report, Volume \_\_\_\_\_.
- Amendment No. \_\_\_\_\_ to Application/SAR dated \_\_\_\_\_.
- Construction Permit No. CPPR- \_\_\_\_\_, Amendment No. \_\_\_\_\_ dated \_\_\_\_\_.
- Facility Operating License No. \_\_\_\_\_, Amendment No. \_\_\_\_\_, dated \_\_\_\_\_.
- Order Extending Construction Completion Date, dated \_\_\_\_\_.
- Other (Specify) \_\_\_\_\_

Office of Nuclear Reactor Regulation

Enclosures:  
As stated

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Susquehanna

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