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 FACIL: 50-387 Susquehanna Steam Electric Station, Unit 1, Pennsylvania 05000387  
 50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylvania 05000388  
 AUTH. NAME: CURTIS, N.W. AUTHOR AFFILIATION: Pennsylvania Power & Light Co.  
 RECIP. NAME: THOMPSON, H.L. RECIPIENT AFFILIATION: Division of Licensing

SUBJECT: Responds to Generic Ltr 85-07, "Implementation of Integrated Schedules for Plant Mods." No integrated living schedule will be negotiated. All NRC features incorporated. No backlog of regulatory mods exist.

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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

JUN 21 1985

Mr. Hugh L. Thompson, Jr., Director  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION  
RESPONSE TO GENERIC LETTER 85-07  
ER 100450 FILE 878  
PLA-2492

Docket Nos. 50-387  
and 50-388

Dear Mr. Thompson:

Generic Letter 85-07, "Implementation of Integrated Schedules for Plant Modifications," solicited our views regarding an integrated living schedule. Our response, following the format provided, is attached.

Very truly yours,

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

cc: M. J. Campagnone USNRC  
R. H. Jacobs USNRC

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ENCLOSURE 2

RESPONSE FORMAT - GENERIC LETTER 85-

PLANT NAME: Susquehanna Steam Electric Station

UTILITY: Pennsylvania Power & Light Company

I. INTENTIONS

- A. Intend to work with the staff to develop an ILS \_\_\_\_\_
- B. Have reservations that must be resolved before developing ILS \_\_\_\_\_
- C. Do not presently intend to negotiate an ILS with the staff   X
- D. Plan to implement an informal ILS only \_\_\_\_\_

II. STATUS

- A. If you answered I.A above:
  - 1. Have you settled on a method for prioritizing the work at your plant(s)?

Circle One:        Yes            No

If yes, select best description:

- Engineering judgement \_\_\_\_\_
- Analytic Hierarchy process \_\_\_\_\_
- Risk based analysis \_\_\_\_\_
- Cost-benefit analysis \_\_\_\_\_
- Other (please describe) \_\_\_\_\_

If no, provide estimated date for selecting a methodology: \_\_\_\_\_  
Date

or

If not presently available, provide estimated date for scheduling the selection of a methodology: \_\_\_\_\_

- 2. What is your estimated date for making a submittal to the NRC- \_\_\_\_\_

or

If not presently available, planned date for scheduling a submittal to the NRC \_\_\_\_\_

B. If you answered I.B above:

1. Please explain your reservations on separate sheet(s) or provide your schedule for supplying an explanation

See separate sheet(s)

or

Separate submittal scheduled for

\_\_\_\_\_  
(Date)

2. If available to meet with the staff to discuss your concerns, propose a time frame for such a meeting and provide a contact that can make arrangements

Contact/Time Frame \_\_\_\_\_

Phone Number \_\_\_\_\_

C. If you answered I.C

1. Would you be willing to meet with the staff to discuss the development of an ILS for your facility(s)?

Circle One:

Yes

No

If yes, propose a time frame for such a meeting and provide a contact that can make arrangements.

Contact \_\_\_\_\_

Time Frame \_\_\_\_\_

Phone Number \_\_\_\_\_

If no, any constructive comments you have would be appreciated.

(See Below)\*

### III. ADDITIONAL ITEMS

Please make any suggestions you may have as to how a utility sponsored availability/reliability project might be credited for plant safety enhancement. Provide additional constructive comments as appropriate.

\*SSES has incorporated essentially all NRC required features and does not have a backlog of regulatory required modifications. In recent years, NRC has been reasonable when imposing schedules and has permitted tailoring of schedules to fit our constraints. Consequently, we have little incentive to pursue an integrated schedule.