



2 4

WESTERN UNION



Pennsylvania Power & Light Company

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

Harold W. Keiser
Senior Vice President-Nuclear
215/770-4194

APR -3 1980

Director of Nuclear Reactor Regulation
Attn.: Dr. W.R. Butler, Project Director
Project Directorate I-2
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION
FIRE PROTECTION - ALTERNATE CO₂ TESTING
PLA-3365 FILES A17-15/A20-1/R41-2

Docket Nos. 50-387
and 50-388

Dear Dr. Butler:

Enclosed is PP&L's report addressing alternative testing of CO₂ systems. This report responds to Unresolved Item 89-09-01.

The testing and analysis performed by PP&L confirms that the automatic CO₂ systems addressed by the Susquehanna SES Technical Specifications will operate as designed thereby ensuring the extinguishment of deep seated cable fires.

As a precautionary action, fire watches were established for areas protected by CO₂ systems questioned by the staff. The results of testing indicate that precautionary actions are no longer required and will be discontinued.

The attached report is proprietary and in accordance with 10CFR2.790. An affidavit from Pennsylvania Power & Light Company is enclosed.

Very truly yours,

H. W. Keiser

cc: NRC Document Control Desk (original)
NRC Region I
Mr. G.S. Barber, NRC Sr. Resident Inspector
Mr. M.C. Thadani, NRC Project Manager
9004100316 900403
PDR ADOCK 05000387
F PDC

PENNSYLVANIA POWER & LIGHT COMPANY

AFFIDAVIT

I, Walter J. Rhoades, being duly sworn, depose and state as follows:

1. I am Group Supervisor-Nuclear, Pennsylvania Power & Light Company, and have been delegated the function of reviewing the information described in the document, Report on Alternative to CO₂ Full Discharge Test, Susquehanna Steam Electric Station, which is sought to be withheld and have been authorized to apply for its withholding.
2. This report contains the results of testing performed to support the development of a methodology intended to be used as an alternative to full discharge testing of CO₂ fire protection systems.
3. I am acquainted with the value and sensitivity of the information in relation to industry knowledge.
4. I have evaluated the document identified in Paragraph 1 above and found it to contain information (i.e. test results) which is proprietary and which is customarily held in confidence by Pennsylvania Power & Light Company. Access to such documents within the Company is limited and such documents are clearly identified as proprietary.
5. The information to the best of my knowledge and belief has consistently been held in confidence by Pennsylvania Power & Light Company, no public disclosures have been made, and it is not available in public sources. All disclosures to third parties have been made pursuant to regulatory provisions of proprietary agreements which provide for maintenance of the information in confidence.
6. Public disclosure of the information sought to be withheld is likely to cause harm to the competitive position of the Pennsylvania Power & Light Company and deprive or reduce the availability of profit making opportunities because it would provide other parties with valuable information.



2 3

1 2 3

1 2 3

AFFIDAVIT

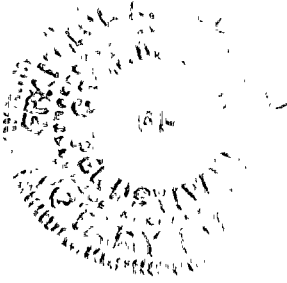
COMMONWEALTH OF PENNSYLVANIA)
: SS
COUNTY OF LEHIGH)

Walter J. Rhoades, being duly sworn, deposes and says:

That he has read the foregoing affidavit and the matters stated therein are true and correct to the best of his knowledge, information, and belief.

Executed at Allentown, Pennsylvania, this 28th day of March 1990.

Walter J. Rhoades
Walter J. Rhoades
Pennsylvania Power & Light Company



Sworn to and subscribed before me this 28th day of March, 1990.

Francine A. Greenzweig
Notary Public

NOTARIAL SEAL
Francine A. Greenzweig, Notary Public
City of Allentown, Lehigh County, Pa.
My Commission Expires Oct. 29, 1990

21



2000

4 3

