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SUBJECT: Provides status & direction of efforts to rewrite plant emergency action levels.

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OCT 15 1990

Director of Nuclear Reactor Regulation
Attention: 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
EMERGENCY ACTION LEVEL REWRITE
PLA-3453 FILE A17-13

Dear Dr. Butler:

This letter provides the status and direction of our efforts to rewrite the SSES Emergency Action Levels (EALs).

BACKGROUND

This project was initiated based on NRC exercise comments, lessons learned in our February 3, 1990 Alert, and weaknesses identified during internal drills. The objective of the project is to revise the SSES EALs into clear and specific EALs that reflect the intended definition of each emergency class.

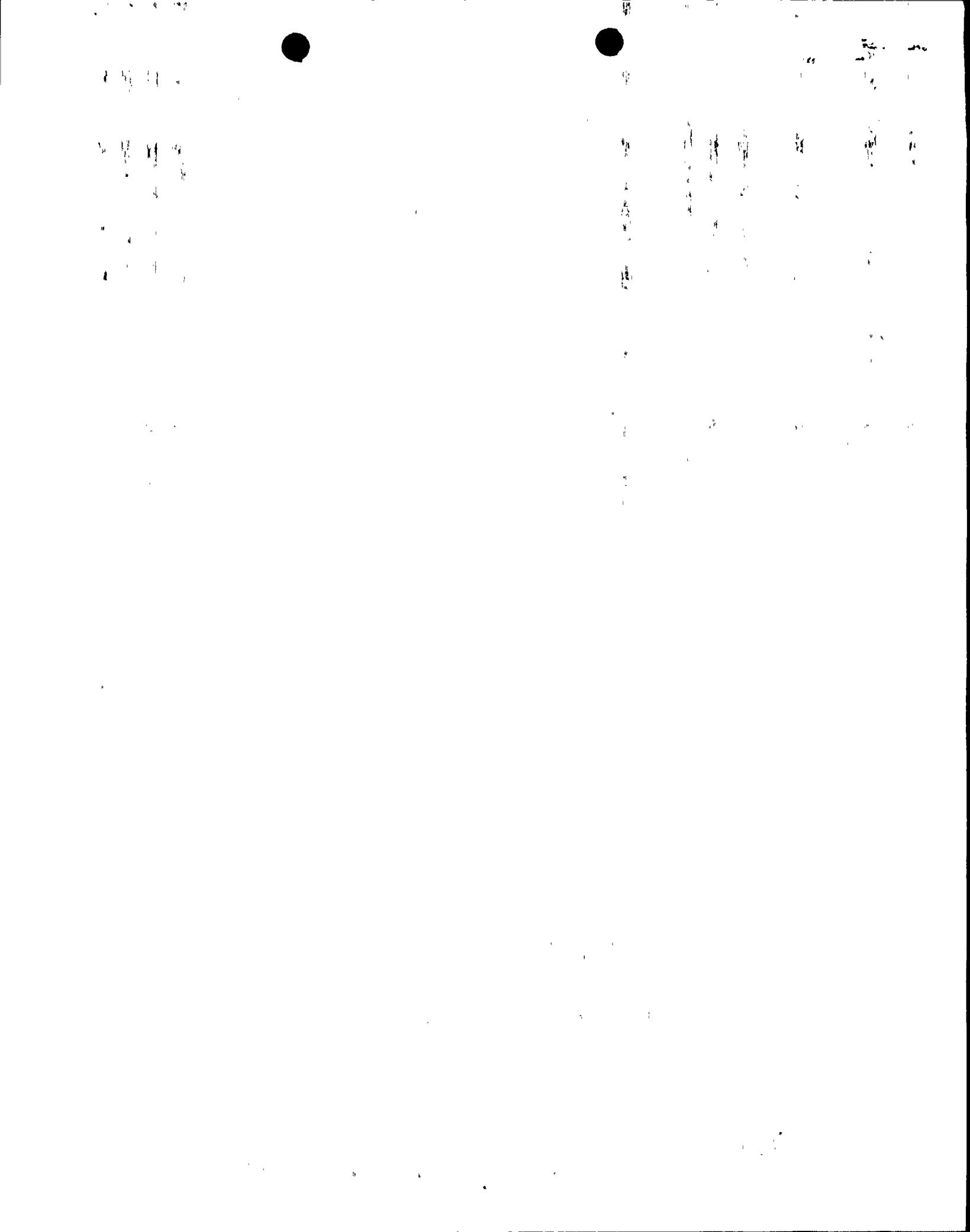
APPROACH

A team of consultants with experience in emergency planning, operations, and communications theory will interview people in the SSES emergency response organization who use the EALs. The interviews will focus on identifying the needs of the organization and suggestions for improvement. A task force of experienced people will provide direction to the contractor and feedback to PP&L management on status and results.

Proposed changes to the EALs will consider the recently completed NUMARC study (which we participated in), NUREG 0654 guidance, multiple events, the SSES IPE, the SSES FSAR, and specific problem areas noted in drills and exercises. The basis for each EAL will be documented to facilitate training and future changes.

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Alarm Response Procedures, Emergency Operating Procedures and Off Normal Procedures will be reviewed and changes recommended to provide cues that direct the operators consult the EALs.

When the proposal is complete we will seek NRC approval of the change prior to implementation. When NRC approval has been obtained emergency response personnel will be trained on the changes.

STATUS

A contractor with the prerequisite experience has been selected through a competitive bidding process and the project has begun. We expect to have a draft for discussion with you later this year.

We recognize the importance of initiating conditions and emergency action levels and want to have the best possible guidance available to our emergency response personnel. We will seek your insights and intend to work closely with the NRC to establish a classification scheme that meets the intent of the law and best serves the public.

If you have any questions or suggestions please contact James Minneman our Supervisor of Emergency Planning.

Very truly yours,



H. W. Keiser

- cc: NRC Document Control Desk (original)
NRC Region I
Mr. W. J. Lazarus, Region I
Mr. G. S. Barber, NRC Resident Inspector - SSES
Mr. M. C. Thadani, NRC Project Manager