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 RECIP. NAME RECIPIENT AFFILIATION  
 BUTLER, W.R. Project Directorate I-2

SUBJECT: Provides update re PP&L's scheduled plans for completion of  
 Susquehanna SES Individual Plant Exam & implementation of  
 Rev 4 of BWR Owners Group Emergency Procedures Guidelines,  
 per 910710 ltr.

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# Pennsylvania Power & Light Company

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JUL 31 1991

Harold W. Keiser  
Senior Vice President-Nuclear  
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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**  
**REVISED IPE SUBMITTAL SCHEDULE (G.L. 88-20)**  
**PLA-3622                      FILES R41-2/R41-1D**

Docket Nos. 50-387  
and 50-388

- References:*
1. Letter, PLA-3603, H.W. Keiser to W.R. Butler, "Response to Generic Letter 88-20, IPE", dated July 10, 1991.
  2. Letter, PLA-3280, H.W. Keiser to W.R. Butler, "Proposed Response to Generic Letter 88-20 Individual Plant Examinations", dated October 26, 1989.

Dear Dr. Butler:

This letter is a follow-up to my correspondence earlier this month (Reference 1), and provides an update regarding PP&L's plans for completion of the Susquehanna SES Individual Plant Examination (IPE) and our implementation of Revision 4 of the BWR Owners Group Emergency Procedures Guidelines (EPG-4).

Performance of the IPE analysis has afforded PP&L an opportunity to gain a systematic, comprehensive assessment of nuclear safety at the Susquehanna plant. The resulting insights have yielded a number of opportunities for safety improvement, with recommended design or procedure changes already either being implemented or under internal review. Our approach to risk management is based on the principle of defense-in-depth, and we identify safety improvement opportunities based on a prescribed set of severe accident defense-in-depth protection criteria. PP&L has discussed its risk management philosophy and defense-in-depth criteria with NRC Staff on previous occasions, and we are available for further meetings upon your request.

Some of the safety improvement opportunities being derived from our IPE involve recommended changes to the Emergency Operating Procedures (EOPs). Our intent has been to implement the IPE-based improvements as part of our EOP upgrade to EPG-4 in order to minimize the need for future changes to the EOPs and to gain the IPE benefits sooner rather than later. Any deviations, including those of safety significance, from the BWROG EPG-4 will be documented, justified, and retained for future reference. We also plan to inform the BWROG of our intended exceptions to EPG-4 and solicit their comments for consideration.

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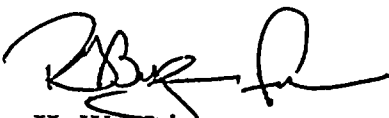
Our objective has been to perform the most technically correct and thorough evaluation of severe accident challenges as is possible with our in-house PRA capability. To that end, and to ensure complete understanding of the phenomenology involved, as well as the system interactions, a considerable effort has been expended in developing and exercising deterministic models of accident progressions as well as system responses. That aggressive goal has led to a very demanding and resource intensive effort which has in turn necessitated the need to extend our original scheduled completion. Given the current status of those efforts, and barring the discovery of significant errors during final documentation reviews, we will submit the IPE report by December 15, 1991.

In addition to the schedule, there are two other changes to the IPE plan we provided in Reference 2. First, PP&L will not include internal fires in this IPE as they will be evaluated as part of the external events, consistent with Supplement 4 of Generic Letter 88-20. Second, although PP&L did not originally plan to include a source term assessment as part of its IPE submittal, we have decided, based on discussions with NRC Staff, to perform the source term assessment.

We apologize for any inconvenience or difficulties which our IPE submittal delay may cause the Staff.

If you have any questions on this, please contact Mr. W. W. Williams at (215) 774-7910.

Very truly yours,



H. W. Keiser

cc: NRC Document Control Desk (original)  
NRC Region I  
Mr. G. S. Barber, NRC Sr. Resident Inspector  
Mr. J. J. Raleigh, NRC Project Manager

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