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 BYRAM, R.G. Pennsylvania Power & Light Co.
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SUBJECT: Forwards addl change to proposed rev to emergency plan re moving EOF to div headquarters. EOF shall be functional within 1 h of activation of site area emergency, per NUREG-0696.

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U.S. Nuclear Regulatory Commission
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SUSQUEHANNA STEAM ELECTRIC STATION
ADDITIONAL CHANGE TO THE PROPOSED
REVISION TO THE EMERGENCY PLAN:
MOVING THE EOF TO THE NORTHEAST
DIVISION HEADQUARTERS
PLA-4372 FILE R41-2

Docket Nos. 50-387
and 50-388

- References: 1. Letter (PLA-4298) dated 4/12/95, 'Proposed Revision to the Emergency Plan: Moving the EOF to the Northeast Division Headquarters', from R. G. Byram to NRC
2. Letter (PLA-4334), dated 4/10/95, 'Response to NRC Questions on EOF Move', from R. G. Byram to NRC

This letter provides a revision to Pennsylvania Power & Light Company's proposed submittal on the relocation of the Emergency Operations Facility (EOF) in regard to the time to activate the EOF. As discussed at the meeting on August 29, 1995, we have reevaluated the time required to activate the new EOF. After evaluation of the required functions, driving time, personnel locations, the performance of the off-hours unannounced drill in July 1995, and procedures, we have concluded that the activation of the new EOF can be accomplished within 90 minutes of the declaration of a Site Area Emergency or higher. Therefore, a revision to our original submittal is required. The following revisions to our original submittal (Reference 1) are proposed:

- The section titled 'ACTIVATION OF THE EOF' in Reference 1 is superseded and replaced with the following:

ACTIVATION OF THE EOF

The guidance in NUREG 0696 states that the EOF shall be functional within one hour of activation at the Site Area Emergency. Currently to meet this guidance, an interim EOF staff, composed of site personnel, is notified and reports to the EOF at an Alert

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classification to prepare the facility should activation become necessary. This interim staff activates the EOF within one hour of the Site Area Emergency declaration and takes the turnover from the TSC. The permanent EOF staff is activated upon the declaration of a Site Area Emergency. Most of the permanent EOF staff, whose normal work location is Allentown, would arrive at the existing EOF between one hour forty-five minutes and two hours after the declaration of the Site Area Emergency. The permanent EOF staff would then take the turnover from the interim staff. This arrangement presently meets the guidelines of NUREG-0696; however, there are two staff turnovers within three hours of declaring the Site Area Emergency.

PP&L has determined that it would be impractical to use plant personnel as an interim staff to activate the proposed EOF until the permanent staff arrives. The proposed EOF is approximately 35 minutes by automobile from the plant and approximately 65 minutes by automobile from Allentown. Using the existing plan would require the interim staff to manage the emergency for less than one hour before turning over the management to the permanent staff. This is inefficient and can introduce additional communication difficulties with respect to the management of the emergency.

To meet the intent of the NUREG-0696 guidance, PP&L proposes to have the permanent EOF staff report to the EOF at the declaration of an Alert. PP&L believes this provides reasonable assurance the EOF would be fully functional within one hour of the declaration of a Site Area Emergency. The exceptions are fast moving events or events immediately classified at the Site Area Emergency level or higher. For events that begin at the Site Area Emergency level or higher, the TSC and EOF would be activated at the classification. The TSC would assume management of the emergency from the control room within one hour. The EOF would be fully functional and take command of the emergency within 90 minutes after the declaration of a Site Area Emergency or higher. This proposed activation of the EOF does not decrease the effectiveness of PP&L's response to an emergency since for the time it takes for the EOF staff to respond, the TSC has adequate staffing to manage the emergency. Also not having an interim staff reduces the number of turnovers in the management of an emergency and thus reduces the possibility of introducing communication difficulties into the management of an emergency.

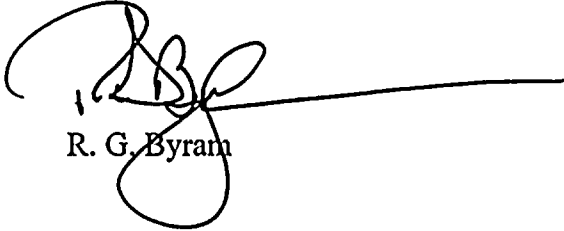
- Insert 1 to Page 6-2 of the Emergency Plan has been revised to state that the EOF will be functional and take command within 90 minutes of the declaration of a Site Area Emergency. The revised insert is attached.
- The layout of the new EOF (Figure 8.3) has been revised and is attached.

In order to validate our 90 minute activation time, we will perform an off-hours, unannounced drill in which we will demonstrate that the key EOF staff can be notified and physically report to the new EOF. Once the minimum staff needed to declare the EOF operational have reported to the EOF, we will terminate the drill. We will either add a reasonable allowance time for EOF post-arrival briefings and other initial duties to the physical drill time or actually test the takeover

portion to ensure that our commitment to assume command of the emergency within 90 minutes is met. If the NRC staff would like to observe this drill, please notify us.

If you have any questions, please contact Mr. C. T. Coddington at (610) 774-7531.

Very truly yours,



A handwritten signature in black ink, appearing to be 'R. G. Byram', is written over a horizontal line. The signature is stylized with loops and a long horizontal stroke extending to the right.

R. G. Byram

- cc: NRC Region I
Ms. M. Banerjee, NRC Sr. Resident Inspector
Mr. C. Poslusny, NRC Sr. Project Manager
Mr. R. Keimig, Region I
Mr. F. Laughlin, Region I