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SUBJECT: Informs that util would like to meet w/NRC prior to sending results of IPE analyses to discuss schedule for completion & to ensure approach for resolving quantification issues is acceptable to satisfy requirements of GL 88-20.

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NOTES: 05000387

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**SUSQUEHANNA STEAM ELECTRIC STATION
PLAN FOR REVISED IPE ANALYSES
PLA-4803 FILE R41-2**

Docket Nos. 50-387
and 50-388

We have reviewed your safety evaluation report discussing our response to GL 88-20. We are pleased you find our deterministic Defense-in-Depth evaluation acceptable as a method for identifying instances of plant improvement. We are committed to the Defense-in-Depth concept in our risk assessment work, since we find that it provides a powerful safety insight that is not available using more conventional probabilistic techniques. Additionally, incorporating a rigorous Defense-in-Depth evaluation in our risk assessment work has allowed us to bridge the gap between risk studies and the more traditional licensing bases of the plant. This has allowed PP&L to more effectively evaluate the safety significance of many decisions.

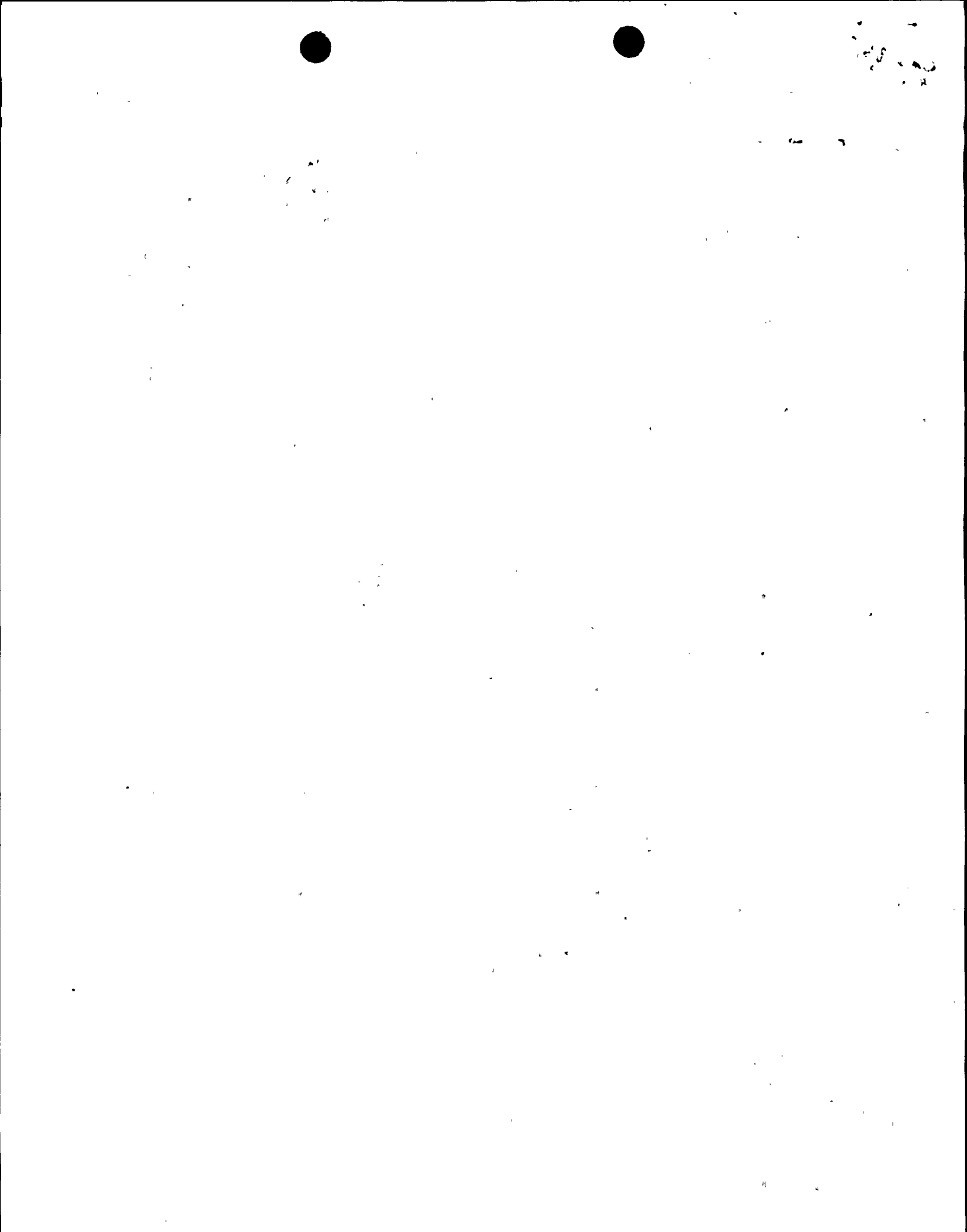
PP&L is committed to resolve the remaining concerns with our IPE. As your letter states you have concerns with our treatment of human error, common cause failure, and important phenomena in the back-end analysis. In performing our IPE we have adopted a non-traditional performance based approach to these evaluations. Using these methods we have identified safety improvements that have significantly lowered the risk at Susquehanna. However, we understand your need to affirm that the methods we employ do not skew the results or result in an optimistic representation of our plant.

To this end, PP&L plans to perform a focused and effective revision of the Susquehanna IPE. For each of the areas of concern identified by the NRC, PP&L will perform revised analyses and quantifications using state of the art PRA models and accounting for uncertainties and results of other PRAs. The revised analyses and quantifications for each area will be subjected to a peer review, including inputs from Dr. William Vesley, before final incorporation into the Susquehanna IPE. As part of these revised analyses, PP&L will isolate the effects of the modifications and improvements in the plant to separate quantification and modeling effects from effects of plant changes and improvements. In past responses to the NRC, PP&L has

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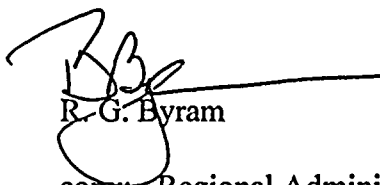


presented qualitative justifications, focusing on the most likely and expected situations. In the IPE revision, the analyses and quantifications will account for the full range of possibilities which can occur, using PRA state of the art knowledge.

It is important to PP&L that the NRC gain confidence in our work and conclude that the Susquehanna IPE satisfies all the requirements of GL 88-20. To achieve this goal, PP&L would like to meet with you prior to sending the results of our analyses to discuss the schedule for completion and to ensure our approach for resolving these quantification issues is acceptable.

For further information please contact Mr. A. J. Roscioli at (610) 774-4019.

Sincerely,



R. G. Byram

copy: Regional Administrator - Region I
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