

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9904200111	DOC. DATE: 99/04/12	NOTARIZED: NO	DOCKET #
FACIL: 50-387 Susquehanna Steam Electric Station, Unit 1, Pennsylvania			05000387
" 50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylvania			05000388
AUTH. NAME	AUTHOR AFFILIATION		
BYRAM, R.G.	Pennsylvania Power & Light Co.		
RECIP. NAME	RECIPIENT AFFILIATION		
	Records Management Branch (Document Control Desk)		

SUBJECT: Transmits proposed addition to SSES emergency plan, for NRC review & approval. Addition involves new EAL to account for potential conditions associated with use of new dry cask storage sys being installed at station.

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NOTES: 05000387

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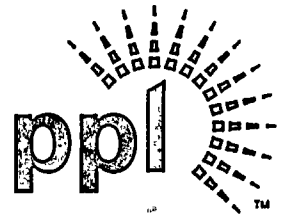
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TOTAL NUMBER OF COPIES REQUIRED: LTR 10 ENCL 10

MAY

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APR 12 1999

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Stop P1-137
Washington, D.C. 20555

**SUSQUEHANNA STEAM ELECTRIC STATION
REQUEST FOR APPROVAL OF EMERGENCY
ACTION LEVEL ADDITION
PLA-5043**

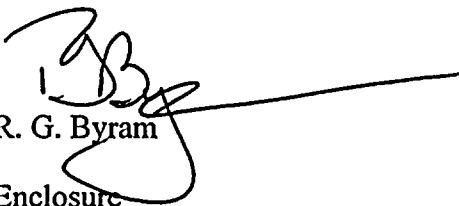
Docket Nos. 50-387
and 50-388

The purpose of this letter is to transmit for NRC review and approval a proposed addition to the Susquehanna Steam Electric Station Emergency Plan (attached). This addition involves a new Emergency Action Level (EAL) to account for potential conditions associated with the use of the new Dry Cask Storage System being installed at the station. This addition is being submitted for NRC approval in accordance with the requirements of 10 CFR 50, Appendix E, Section IV.B, "Assessment Actions," and NRC Emergency Preparedness Position # 4, dated November 19, 1998. This request is consistent with the guidance found in NUMARC /NESP-007 (Rev 2) titled "Methodology for Development of Emergency Action Levels" and approved by the NRC in Regulatory Guide 1.101 (Rev 3). This request is similar to an Oyster Creek Nuclear Generating Station submittal, dated January 12, 1996, for which NRC's approval is documented in a NRC SER dated July 26, 1996.

PP&L, Inc. requests NRC approval of the Dry Cask Storage System EAL, as described in the enclosure, by June 1, 1999 to support any procedural revisions and additional training required by the EAL. This will support implementation of this EAL consistent with our scheduled initial use of the Dry Cask Storage System on August 2, 1999.

Please contact Mr. Terry L. Harpster at (610) 774-7504 if you have any questions concerning these changes.

Sincerely,


R. G. Byram
Enclosure

copy: NRC Region I
Mr. S. L. Hansell, NRC Sr. Resident Inspector
Mr. V. Nerses, NRC Sr. Project Manager
Mr. D. J. Allard, BRP/DEP

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EAL for Dry Cask Storage

Summary of Change

This proposed change involves adding an Emergency Action Level to account for potential conditions associated with the use of the new Dry Cask Storage System being installed at the Susquehanna SES. The proposed change has been reviewed under the requirements of 10 CFR 50.54q and found not to decrease the effectiveness of the plan. The plan as changed continues to satisfy the applicable requirements of Appendix E to 10 CFR 50.

Justification for Change

The proposed EAL was developed using the NUMARC/NESP – 007 (Rev. 2) guidelines. It will be implemented under the Unusual Event classification with entry into the classification when events occur which have the potential for damaging or degrading the irradiated spent fuel being stored or the fuel storage containers, after the fuel has been removed from the reactor building. This includes irradiated spent fuel damage or degradation while transporting it to the new spent fuel storage facility. The proposed EAL does not cover potential emergency conditions for irradiated spent fuel located within the reactor building as these conditions are addressed under existing EALs (Damage to Irradiated Fuel and In-Plant High Rad Classifications).

Implementation procedures associated with the spent fuel storage facility will include, in part: (1) periodic walkdowns and surveillances of the facility, (2) periodic radiation surveys of the facility, and (3) remote monitoring of the daily temperature and 24 hour heat-up rates of casks stored in the facility.

In accordance with the NUMARC guidelines, EAL classifications above the Unusual Event classification have not been proposed. Severe degradation or damage resulting in the dispersion of irradiated spent fuel from the dry cask storage process to the environment has been evaluated under 10 CFR 72.212 and found not to be a credible condition. Regardless, this condition, should it occur, is covered under the currently existing Radiological Effluents classification.

State and Local County Review

The proposed change has been discussed and agreed upon by the Pennsylvania Emergency Management Agency, Pennsylvania Department of Environmental Protection/Bureau of Radiation Protection and the affected local governmental agencies.

Implementation

The proposed changes will be implemented upon receipt of NRC approval. PP&L Inc requests your approval by June 1, 1999 to support any procedural revisions and additional training required by the EAL. This will support implementation of this EAL consistent with our scheduled initial use of the Dry Cask Storage System on August 2, 1999.

Table 5.1

CLASSIFICATION OF EMERGENCY CONDITIONS
 (Unusual Event)

Initiating Conditions	Emergency Action Levels	Basis for Initiating Conditions ¹
<p>16.A. Situations are occurring or have occurred during the transport of the irradiated spent fuel to the onsite storage facility, which jeopardize the integrity of the spent fuel or its container.</p> <p><u>OR</u></p> <p>16.B. Situations are occurring or have occurred at the irradiated spent fuel storage facility, which jeopardize the integrity of the dry cask storage system.</p>	<p>16.A. or 16.B (A or B)</p> <p>A. Radiological readings exceed 2 R/hour at the external surface of any transfer cask or horizontal storage module.</p> <p><u>OR</u></p> <p>B. Radiological readings exceed 1 R/hour one foot away from the external surface of any transfer cask or horizontal storage module.</p>	<p>1. NUMARC EAL AU2, Item 3.</p>



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**SUSQUEHANNA STEAM ELECTRIC STATION
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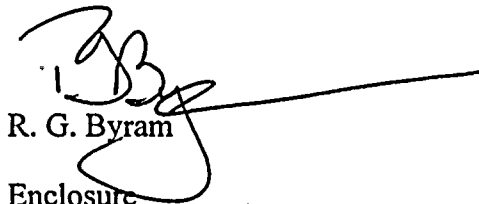
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