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SUBJECT: Forwards proposed rev to SSES emergency plan for review & approval. Proposed rev contains listed changes, including relocation of EOF to Northeast Div Headquarters, EOF activation & relocation of ERDS. *see Reports*

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APR 12 1995

U.S. Nuclear Regulatory Commission
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SUSQUEHANNA STEAM ELECTRIC STATION
PROPOSED REVISION TO THE EMERGENCY
PLAN: MOVING THE EOF TO THE NORTHEAST
DIVISION HEADQUARTERS
PLA-4298 FILE R41-2

Docket Nos. 50-387
and 50-388

The purpose of this letter is to transmit for the NRC's staff review and approval a proposed revision to the Susquehanna SES Emergency Plan. Pennsylvania Power & Light Company has determined that certain portions of this revision can not be implemented without NRC approval. This proposed revision contains six major changes to the Emergency Plan. These changes are:

1. Relocation of the Emergency Operations Facility (EOF) to PP&L's Northeast Division Headquarters in Plains Township, east of Wilkes-Barre (NRC approval required),
2. EOF Activation (NRC approval required),
3. The use of interim data until Safety Parameter Display System (SPDS) displays are installed (NRC approval required),
4. Relocation of Emergency Response Data System (ERDS) to the control structure to be activated by Technical Support Center (TSC) personnel,
5. Retention of routine dose calculations by TSC throughout the entire emergency,
6. Organizational structure changes.

These changes came about as a result of PP&L's evaluation of its performance in the Emergency Management Area and of the lessons learned from the preparation for Federal Field Exercise III

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(FFE-III). PP&L recognizes that enhancements can be made in the Emergency Management Area, to better utilize personnel and to better serve the public. We believe that these changes improve our ability to manage an emergency.

RELOCATION OF EOF

The proposed new location for the EOF is PP&L's Northeast Division Headquarters. The Northeast Division Headquarters is located in Plains Township approximately 3 miles east of Wilkes-Barre, PA just off PA Route 115. The proposed EOF is about 22 miles from the TSC and therefore, NRC approval is required prior to relocating the EOF. The proposed EOF is accessible by two major highways (Interstate I-81 and the PA Turnpike) and is approximately 15 minutes from the Scranton/Wilkes-Barre Airport. Except for the staffing time recommendation and SPDS availability, the new EOF will meet the guideline of NUREG 0696 Section 4. These exceptions are discussed later in this submittal.

The new EOF provides several advantages over the existing EOF.

- The proposed EOF is closer to the Corporate Headquarters in Allentown and more easily accessed by the staff responding from Allentown. Therefore, the response time of the staff to the proposed EOF location is approximately 30 minutes faster than responding to the existing EOF.
- The field offices for the host county, PEMA, DFO and FRMAC are expected to be located in the Wilkes-Barre area. Having the EOF located in the vicinity of these field offices will increase the coordination efficiency with these agencies during the recovery phase of the event.
- Our Media Operations Center (MOC) is located in the same building; therefore, access to technical information is readily available to the Public Information Manager (PIM). This will improve the PIM's ability to respond to questions from the media and the public.
- The EOF will be located outside the Emergency Plan Zone; therefore, the backup EOF will not be necessary. Any radiological concerns at the current EOF due to its location will not be a concern at the new location.

Attachment 1 shows the relative locations of our existing and proposed emergency response facilities.

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 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.

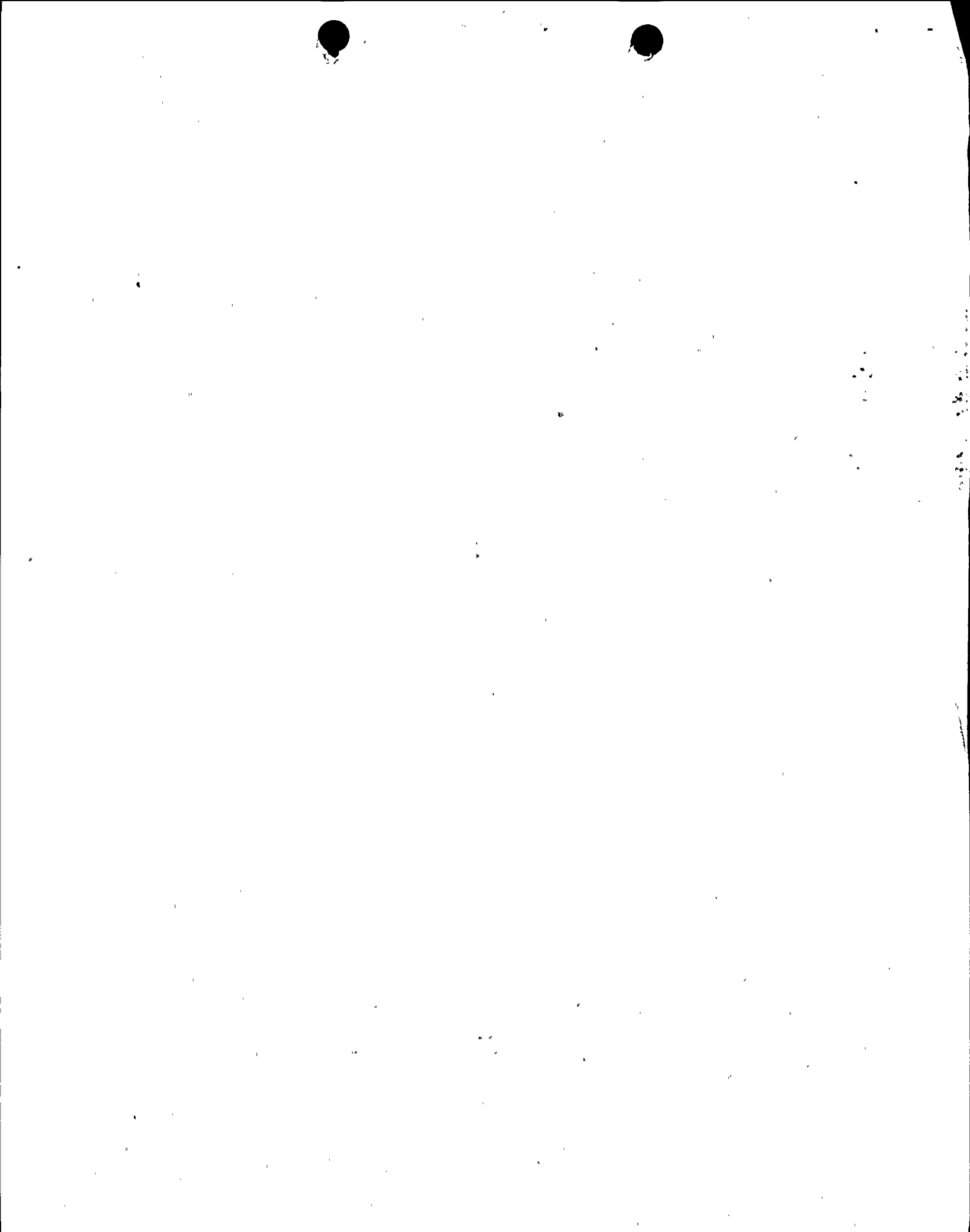
PP&L has determined that it would be impractical to use plant personnel as an interim staff to activate the proposed EOF until the permanent staff arrives. The proposed EOF is approximately 35 minutes by automobile from the plant and approximately one hour and fifteen minutes by automobile from Allentown. 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 staff would arrive at the EOF in less than one and one-half hours after the declaration of a Site Area Emergency or higher. The EOF would be fully functional and take command of the emergency in less than one hour after their arrival at the EOF. 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.

SPDS

A major plant improvement project called the Plant Integrated Computer System (PICSY) project is being implemented at Susquehanna SSES. This project will combine the Safety Parameter Display System (SPDS) computer, the Plant Computer System computer, the Remote Data Analysis System (RDAS) computer and the Emergency Response Data System (ERDS) computer into one integrated computer system. The present completion schedule is for the Unit 2 PICSY to be installed by the end of fourth quarter of 1995 and the Unit 1 PICSY to be installed by the end of the fourth quarter of 1996.

NUREG-0696, Section 5.2 requires that SPDS displays be available in the EOF. However, SPDS displays will not be available in the proposed EOF until the Plant Integrated Computer System (PICSY) is installed. As stated above the installation of PICSY is presently scheduled



for the fourth quarter of 1995 for Unit 2 and the fourth quarter of 1996 for Unit 1. SPDS will remain available in the TSC. The Emergency Data System (EDS) will be available in the proposed EOF. EDS is comprised of information sent to the NRC via ERDS and selected technical and critical function parameters. This data is updated every three minutes and can be used for manual trending of information. Attachment 2 is an example the EDS available information.

To compensate for not having SPDS displays available for Unit 1 and Unit 2, a person will be assigned to the additional SPDS terminal in the TSC. This person's only function is to provide a link with the proposed EOF to transmit SPDS data. This person can transmit the SPDS data either by phone or by fax. PP&L believes that this temporary compensatory measure is equivalent to having SPDS available in the proposed EOF. The data available in the proposed EOF will meet the regulations for accident assessment and the protective action recommendation requirements.

OTHER EMERGENCY PLAN CHANGES

1. Organizational Changes

The EOF staff has been reorganized to strengthen its response capability. The positions directly reporting to the Recovery Manager have been realigned thus allowing him to manage the emergency more efficiently. Those positions directly reporting to the Recovery Manager are:

- Assistant Recovery Manager who is responsible for assisting the Recovery Manager as requested and for replacing the Recovery Manager should the Recovery Manager be unable to fulfill his position,
- Engineering Support Supervisor who has the responsibility for the engineering resources and for providing technical information to the Recovery Manager.
- Dose Assessment Supervisor who is responsible for the radiological data and for providing recommendations for protective actions and classification of the emergency to the Recovery Manager,
- EOF Support Supervisor who is responsible for the operation of the EOF and for the formal communications with off-site agencies.
- Liaison Support Supervisor who is responsible for assuring that the County, State and Federal agencies are kept informed of situation and taking care of their needs and responding to their questions,
- Public Information Manager who is responsible for providing the media and public with timely, accurate information about the emergency.

In addition the existing engineering support function in the EOF is supplemented with a systems engineer and a nuclear fuel engineer as well as an electrical engineer and a mechanical engineer. Depending upon the type of engineering support needed to address the emergency, additional engineering resources can be called in to assist the support staff.

The General Office Engineering Support Center facility is no longer needed since additional engineering support has been added to the EOF staff. The engineering leads at the EOF can call in additional engineering staff as needed to respond to the emergency. The General Office Support Center has been eliminated from the Emergency Plan.

These changes to the organization do not involve a reduction in effectiveness of the Emergency Plan.

2. Radiological Changes

Currently the responsibility for providing dose calculations is transferred to the EOF from the TSC when the EOF is fully functional. In this revision the responsibility for providing the dose calculations will remain in the TSC. The TSC personnel will provide the results of the dose calculations to the EOF personnel for their use in the classification of the event. The EOF personnel will have the capability to perform routine dose calculations and will perform the study case calculations. Having the capability to perform dose calculations in the EOF meets the guidance of NUREG-0696. Therefore, having the TSC retain responsibility for dose calculations does not reduce the effectiveness of the Emergency Plan.

3. ERDS

Currently ERDS is located in the EOF and must be activated within one hour of an Alert classification. In this revision the ERDS will be relocated to the control structure and activated by TSC personnel. This change meets the requirements for ERDS and does not reduce the effectiveness of the Emergency Plan.

4. NRC Near Site Location

Currently the NRC's near site location is the EOF. In relocating the EOF to Wilkes-Barre, the new NRC near site location will be in the TSC. Sufficient space has been allocated for NRC personnel.

All changes to the Emergency Plan are shown on the mark up pages in Attachment 3.

STATE AND LOCAL COUNTY REVIEW

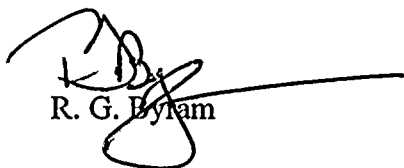
The proposed changes have been reviewed with both local counties (Columbia and Luzerne) and the Commonwealth of Pennsylvania. The local counties and the Commonwealth of Pennsylvania do not object to the moving of the EOF. PP&L will continue to work with the counties and Commonwealth of Pennsylvania to assure that any comment they may have are resolved.

IMPLEMENTATION

PP&L requests that this revision be approved as soon as possible in order to support our plan to accomplish the move this year.

If you have any questions, please contact Mr. C. T. Coddington at (610) 774-7915.

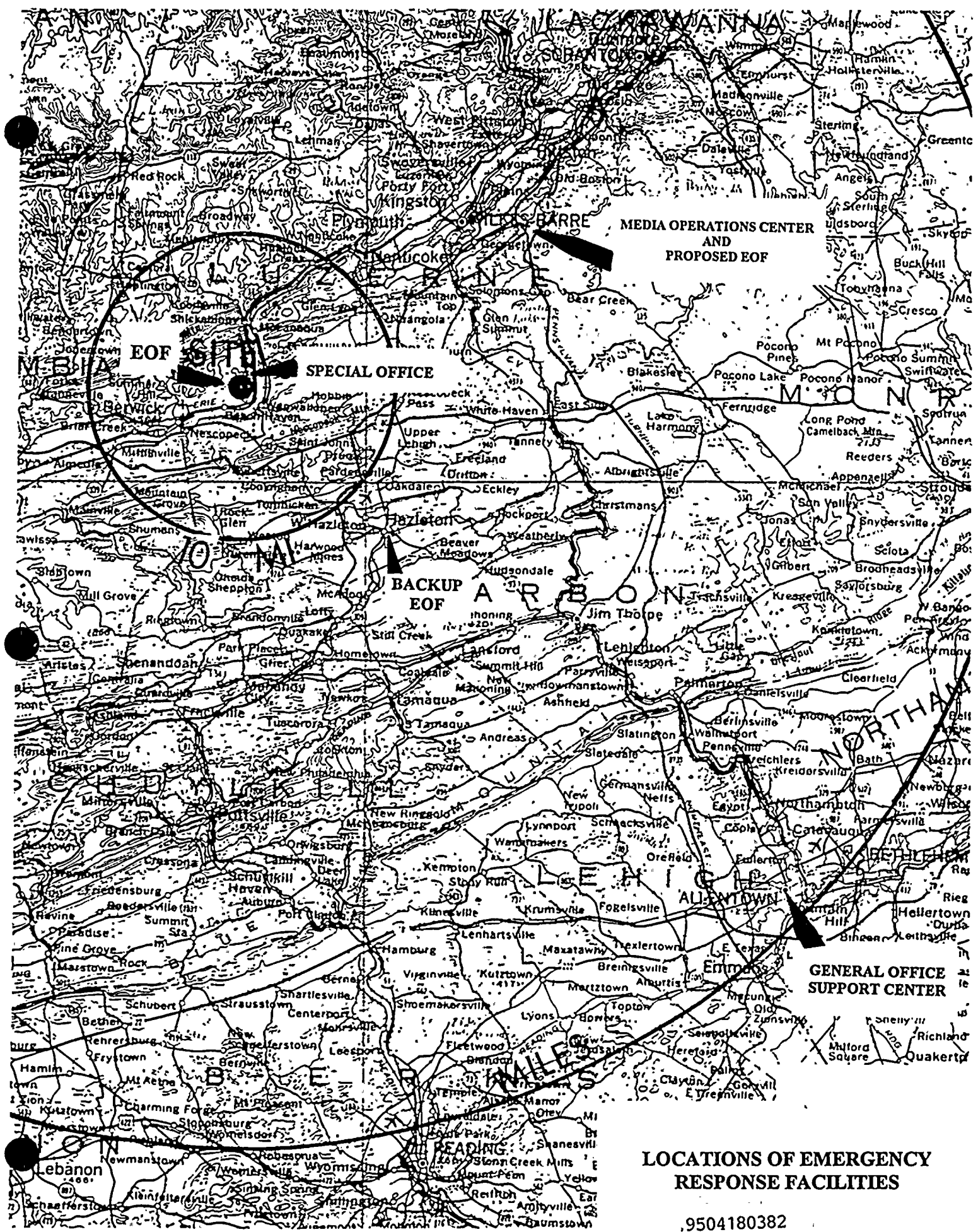
Very truly yours,



R. G. Byram

Attachment

cc: NRC Region I
Ms. M. Banerjee NRC Sr. Resident Inspector-SSES
Mr. R. Keimig Section Chief-Region I
Mr. C. Poslusny, Jr. NRC Sr. Project Manager-OWFN



LOCATIONS OF EMERGENCY RESPONSE FACILITIES

9504180382



 *** DRILL DATA ***
 *** EMERGENCY DATA SUPPORT ***
 *** MEDIA OPERATIONS CENTER ***

PP&L TECHNICAL PARAMETERS
 DATA SHEET 1 OF 3

DATE 09/13/94
 TIME 09:33:05

PT IDENT	DESCRIPTION	UNIT 1		UNIT 2		UNITS	NORMAL VALUES
		DATA	STAT	DATA	STAT		
NM551	APRH A FLUX LEVEL	0.00		100.56		XPWR	0 (SHUTDOWN)
NN109	IRM A FLUX	0.24		13.27		%	0 (SHUTDOWN)
NN10012	SRM A LOG COUNT RATE	6.92E+01		0.00E-01	B	CPS	20 - VARIABLE
NM60022	EX CORE LOG POWER A	0.00	B	0.00	B	XPWR	0 (SHUTDOWN)
NBLO022	WIDE RANGE RX LVL D	24.38		0.00	B	INCHES	-150 - +60
NFP51	REACTOR PRESS SRU 4	802.84		1032.75		PSIG	0 - 1030
NRT52	RECIRC LOOP A PP SUCT TE	463.32		525.91		DEG F	0.00 - 540.00
NXL01	SLC STOR TNK LVL	186.21		4775.00		GAL	4600.0 - 5100.0
NGF01	HPCI PP DSCH LINE FLOW	0.00		299.99		GPM	0 - 5000
NIF01	RCIC FLOW	0.00		0.00		GPM	0 - 600
NHF01	RHR SYS A FLOW	9779.38		1060.64		GPM	0 - 28000
NHF02	RHR SYS B FLOW	0.00		0.00		GPM	0 - 28000
MAT0012	CONTN ATH TEMP 1A	174.23		0.00	B	DEG F	125 - VARIABLE
MAP003Z	DRYWELL PRESS A LOCA RNG	6.53		0.00	B	PSIG	0.3
MAP004Z	DRYWELL PRESS B LOCA RNG	6.53		0.00	B	PSIG	0.3
MAT010Z	SUPP CHAMBER ATH TEMP A	109.58		0.00	B	DEG F	80 - VARIABLE
MAL003Z	SUPPRESSION POOL LEVEL A	24.68		0.00	B	FEET	22.0 - 24.0
MAL004Z	SUPPRESSION POOL LEVEL B	24.68		0.00	B	FEET	22.0 - 24.0
MAT37	SUP POOL D1 BULK TEMP	111.88		77.66		DEG F	80 - VARIABLE
MAT38	SUP POOL D2 BULK TEMP	111.88		78.17		DEG F	80 - VARIABLE
CSLO1	COND STORAGE TANK 1 LVL	68.10		80.13		%	0 - 80
CSLO2	COND STORAGE TANK 2 LVL	69.23		77.94		%	0 - 80
MAR001Z	CONTNM ACC RANG HI RAD A	8.54E-01		0.00E-01	B	R/HR	2.0 (100% POWER, NO FUEL FAILURES)
MAR002Z	CONTNM ACC RANG HI RAD B	1.02E+00		0.00E-01	B	R/HR	2.0 (100% POWER, NO FUEL FAILURES)
PAR07	ARM-07-OFFGAS BYP AREA	0.29		0.86		MR/H	3.8
NAR005Z	OFFGAS PRETREAT RAD A	3.13E+01		0.00E-01	B	MR/H	34
NAR006Z	OFFGAS PRETREAT RAD B	3.02E+01		0.00E-01	B	MR/H	34
NAR07	RBCCV RAD	8.00E+01		7.05E+00		CPS	60
NAR008Z	SW EFFLUENT RAD	6.42E+02		0.00E-01	B	CPS	980
NAR01	MAIN STEAM LINE RAD A	5.45E+01		4.49E+02		MR/H	1052
NAR02	MAIN STEAM LINE RAD B	4.16E+01		6.34E+02		MR/H	698
NAR03	MAIN STEAM LINE RAD C	3.60E+01		7.01E+02		MR/H	564
NAR04	MAIN STEAM LINE RAD D	2.50E+01		1.03E+03		MR/H	739
PAR15	ARM-15-REFUEL FLR- NORTH	1.50		0.37		MR/H	0.16
SCPR	SUPPRESSION CHAMBER PRESS	2.98		0.00	B	PSIG	-0.01

STATUS COOES (BLANK=GOOD, B=BAD, D=DELETED FROM SCAN, S=SUBSTITUTED, ?=SUSPECT DATA)

NOTE(S):

UNIT 2 SPDS COMPUTER - RDAS LINK IS DOWN. ALL UNIT 2 SPDS DATA IS BAD.

 *** DRILL DATA ***
 *** EMERGENCY RESPONSE DATA SYSTEM ***
 *** MEDIA OPERATIONS CENTER ***

CRITICAL SAFETY FUNCTION PARAMETERS
 DATA SHEET 2 OF 3

DATE 09/13/94
 TIME 09:33:05

PT IDENT	DESCRIPTION	UNIT 1		UNIT 2		UNITS
		DATA	STAT	DATA	STAT	
REACTIVITY CONTROL						
PWR	NUCLEAR INSTRUMENTS, POWER RANGE	0.00	B	0.00	B	%
NN109	NUCLEAR INSTRUMENTS, INTER RNG A	0.24		13.12		%
NN112	NUCLEAR INSTRUMENTS, INTER RNG D	31.15		10.75		%
NN115	NUCLEAR INSTRUMENTS, INTER RNG G	6.52		8.75		%
NN116	NUCLEAR INSTRUMENTS, INTER RNG H	30.23		10.85		%
NNX01	IRM A RANGE SWITCH POSITION	645.00		3.00		
NNX04	IRM D RANGE SWITCH POSITION	67.39		3.00		
NNX07	IRM G RANGE SWITCH POSITION	6.52		3.00		
NNX08	IRM H RANGE SWITCH POSITION	0.00	B	3.00		
NN254	IRM DET(S) NOT FULL POSITION	NO		NO		NO/YES
NN259	IRM BYPASS	NO		NO		NO/YES
NN1001Z	NUCLEAR INSTRUMENTS, SOURC RNG A	6.87E+01		0.00E-01	B	CPS
NN1002Z	NUCLEAR INSTRUMENTS, SOURC RNG B	6.87E+01		0.00E-01	B	CPS
NN1003Z	NUCLEAR INSTRUMENTS, SOURC RNG C	6.82E+01		0.00E-01	B	CPS
NN1004Z	NUCLEAR INSTRUMENTS, SOURC RNG D	7.09E+01		0.00E-01	B	CPS
NPY001Z	SRM POSITION A	IN		NOT IN	B	NOT IN/IN
NPY002Z	SRM POSITION B	IN		NOT IN	B	NOT IN/IN
NPY003Z	SRM POSITION C	IN		NOT IN	B	NOT IN/IN
NPY004Z	SRM POSITION D	IN		NOT IN	B	NOT IN/IN
CORE COOLING						
RVL	REACTOR VESSEL WATER LEVEL	16.69		0.00	B	INCHES
NFF52	FEEDWATER FLOW A INTO REACT SYST	0.00		4.70		MLBS/H
NFF53	FEEDWATER FLOW B INTO REACT SYST	0.00		4.73		MLBS/H
NFF54	FEEDWATER FLOW C INTO REACT SYST	0.00		4.66		MLBS/H
NIF01	REACTOR CORE ISOLAT COOLING FLOW	0.00		0.00		GPM
RCS INTEGRITY						
RXPR	REACTOR COOLANT SYSTEM PRESSURE	811.78		0.00	B	PSIG
NGF01	HIGH PRESSURE COOLANT INJEC FLOW	0.00		299.99		GPM
NHF01	LOW PRESS COOLANT INJECT A FLOW	9779.38		1060.64		GPM
NHF02	LOW PRESS COOLANT INJECT B FLOW	0.00		0.00		GPM
LPCS	CORE SPRAY COOLING SYSTEM FLOW	0.00		0.00	B	GPM
RLL004Z	DRYWELL FLOOR DRAIN SUMP LEVEL A	0.00		0.00	B	%
RLL005Z	DRYWELL FLOOR DRAIN SUMP LEVEL B	0.00		0.00	B	%

STATUS CODES (BLANK=GOOD, B=BAD, D=DELETED FROM SCAN, S=SUBSTITUTED, ?=SUSPECT DATA)

NOTE(S):

UNIT 2 SPDS COMPUTER - ROAS LINK IS DOWN. ALL UNIT 2 SPDS DATA IS BAD.

CRITICAL SAFETY FUNCTION PARAMETERS (CONT.)
DATA SHEET 3 OF 3

DATE 09/13/94
TIME 09:33:05

PT IDENT	DESCRIPTION	UNIT 1		UNIT 2		UNITS
		DATA	STAT	DATA	STAT	
RADIOACTIVITY CONTROL						
EGRPRX1	RAD OF RELEASED PART -RX 1 VENT	1.05E+01	B		C	UCI/MIN
EGRIRX1	RAD OF RELEASED I131 -RX 1 VENT	1.35E+00	B		C	UCI/MIN
EGRNRX1	RAD OF RELEASED NBLGAS-RX 1 VENT	0.00E-01	B		C	UCI/MIN
EGRPRX2	RAD OF RELEASED PART -RX 2 VENT	8.54E-01			C	UCI/MIN
EGRIRX2	RAD OF RELEASED I131 -RX 2 VENT	1.24E+00			C	UCI/MIN
EGRNRX2	RAD OF RELEASED NBLGAS-RX 2 VENT	5.74E+02			C	UCI/MIN
EGRPTB1	RAD OF RELEASED PART -TB 1 VENT	2.82E+00	B		C	UCI/MIN
EGRITB1	RAD OF RELEASED I131 -TB 1 VENT	1.79E+00	B		C	UCI/MIN
EGRNTB1	RAD OF RELEASED NBLGAS-TB 1 VENT	0.00E-01			C	UCI/MIN
EGRPSGTS	RAD OF RELEASED PART -SGTS VENT	3.74E-02	B		C	UCI/MIN
EGRISGTS	RAD OF RELEASED I131 -SGTS VENT	5.06E-02	B		C	UCI/MIN
EGRNSGTS	RAD OF RELEASED NBLGAS-SGTS VENT	3.99E+01			C	UCI/MIN
EGRPTB2	RAD OF RELEASED PART -TB 2 VENT	1.53E+00			C	UCI/MIN
EGRITB2	RAD OF RELEASED I131 -TB 2 VENT	2.08E+00			C	UCI/MIN
EGRNTB2	RAD OF RELEASED NBLGAS-TB 2 VENT	8.56E+02			C	UCI/MIN
EGRPSITE	RAD OF RELEASED PART -SITE TOTL	1.57E+01	?		C	UCI/MIN
EGRISITE	RAD OF RELEASED I131 -SITE TOTL	6.51E+00	?		C	UCI/MIN
EGRNSITE	RAD OF RELEASED NBLGAS-SITE TOTL	1.47E+03	?		C	UCI/MIN
VDR001Z	RADIOACTIVITY OF RELEASED LIQ'OS	1.18E+03		0.00E-01	B	CPH
VDF001Z	LRW DISCHARGE FLOW	0.00	B	0.00	B	GPM
PCA	RADIATION LEVEL IN THE DRYWELL	9.39E-01		0.00E-01	B	R/HR
NAR01	RADIATION LVL OF MAIN STM LINE A	5.33E+01		4.49E+02		KR/H
NAR02	RADIATION LVL OF MAIN STM LINE B	4.07E+01		6.34E+02		KR/H
NAR03	RADIATION LVL OF MAIN STM LINE C	3.52E+01		7.01E+02		KR/H
NAR04	RADIATION LVL OF MAIN STM LINE D	2.45E+01		1.03E+03		KR/H

CONTAINMENT CONDITIONS

DWPR	DRYWELL PRESSURE	6.57		0.00	B	PSIG
DWT	DRYWELL TEMPERATURE	173.87		0.00	B	DEGF
SPT	SUPPRESSION POOL TEMPERATURE	112.25		0.00	B	DEGF
SPWL	SUPPRESSION POOL WATER LEVEL	24.70		0.00	B	FEET
HYDGN	DRYWELL HYDROGEN CONCENTRATION	1.68		0.00	B	%
OXYGN	DRYWELL OXYGEN CONCENTRATION	5.05		0.00	B	%

MISCELLANEOUS PARAMETERS

CSL01	CONDENSATE STORAGE TANK 1 LEVEL	68.10		80.13		%
CSL02	CONDENSATE STORAGE TANK 2 LEVEL	69.23		77.94		%
WETULS	WIND SPEED AT REACTOR SITE -60M	9.00			C	KPH
WETLLS	WIND SPEED AT REACTOR SITE -10M	4.00			C	KPH
WETULD	WIND DIR AT THE REACT SITE -60M	229.00			C	DEGFR
WETLLD	WIND DIR AT THE REACT SITE -10M	218.00			C	DEGFR
WETSTAB	AIR STABILITY AT THE REACT SITE	A			C	STABA
WEXERCISE	EXERCISE DATA	YES			C	NO/YES

STATUS CODES (BLANK=GOOD, B=BAD, D=DELETED FROM SCAN, S=SUBSTITUTED, ?=SUSPECT DATA,
C=COMMON: DATA IN UNIT 1 COLUMN ONLY)

NOTE(S):

UNIT 2 SPDS COMPUTER - RDAS LINK IS DOWN. ALL UNIT 2 SPDS DATA IS BAD.