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 AUTH. NAME: CURTIS, N.W. AUTHORITY AFFILIATION: Pennsylvania Power & Light Co.
 RECIP. NAME: YOUNGBLOOD, B.J. RECIPIENT AFFILIATION: Licensing Branch 1

SUBJECT: Forwards response to D Eisenhower 810218 request for addl info re nureg 0694 commitments for implementation of emergency response facilities.

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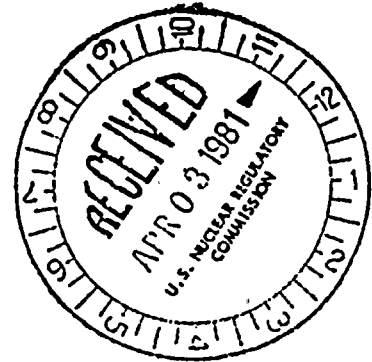
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NORMAN W. CURTIS
Vice President-Engineering & Construction-Nuclear
770-5381

April 2, 1981

Mr. B. J. Youngblood, Chief
Licensing Projects Branch #1
Division of Project Management
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555



SUSQUEHANNA STEAM ELECTRIC STATION
EMERGENCY RESPONSE FACILITIES IMPLEMENTATION -
RESPONSE TO GENERIC LETTER 81-10
ER 100450 FILE 841-12 PLA-704

Dear Mr. Youngblood:

This letter is sent to provide the information requested in the Eisenhut letter on February 18 (Generic letter 81-10) on implementation of emergency response facilities. The scope of information required by this letter was clarified by discussions with Mr. S. Ramos and Mr. E. Williams from the Division of Emergency Preparedness. Based on these discussions, commitments have also been provided in response to requirements in NUREG 0694.

Very truly yours,

A handwritten signature in cursive script that reads "N. W. Curtis".

N. W. Curtis
Vice President-Engineering & Construction-Nuclear

DPM/mks

cc: R. M. Stark - NRC

Boo/
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PENNSYLVANIA POWER & LIGHT COMPANY

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ATTACHMENT

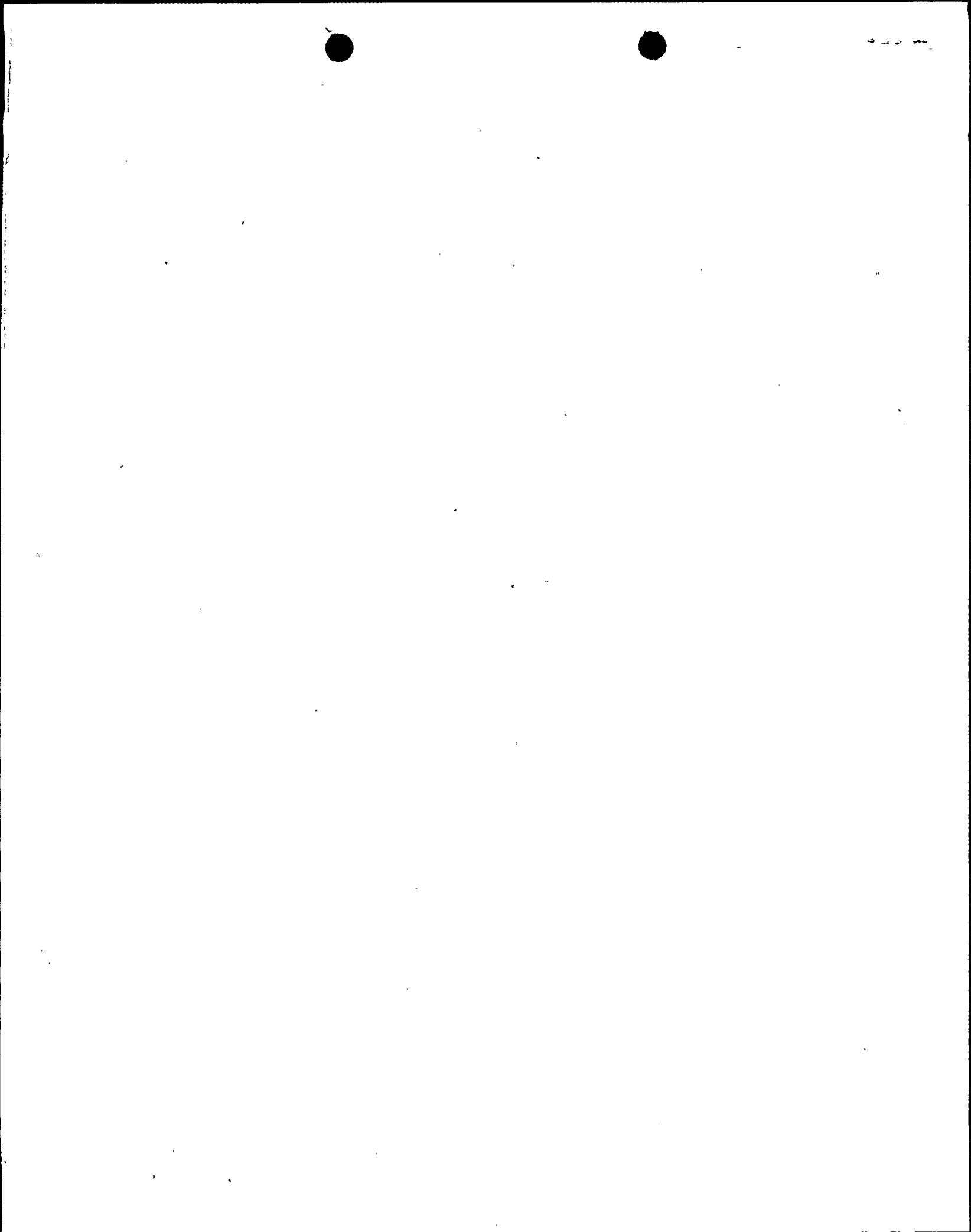
NUREG 0737 Commitments (Generic Letter 81-10)

1. Detailed conceptual design descriptions for all emergency facilities will be submitted to the NRC by June 1, 1981 in accordance with NUREG 0737 Item III.A.1.2 issued by NRC Generic Letter 81-10.
2. The Technical Support Center (TSC) will be functional by October 1, 1982 or prior to fuel load, whichever is later, in accordance with NUREG 0737 Item III.A.1.2 issued by NRC Generic Letter 81-10. NUREG 0696-Final Report will be used as a design guide.
3. The Emergency Operations Facility (EOF) will be functional by October 1, 1982 or prior to fuel load, whichever is later, in accordance with NUREG 0737 Item III A.1.2 issued by NRC Generic Letter 81-10. NUREG 0696 - Final Report will be used as a design guide.
4. The Emergency Response Computer System (ERCS) will be implemented by the dates given or prior to fuel load, whichever is later.
 - a) The Safety Parameter Display System (SPDS) will be operational in the control room and the TSC by October 1, 1982. The SPDS will not be operational in the EOF by October 1, 1982. This data display capability is expected to be available in the EOF by July 1, 1984. Data from the plant process computer will be provided in the EOF from October 1, 1982 until the SPDS is installed and operational.
 - b) The Nuclear Data Link (NDL) will not be operational by October 1, 1982. This data transmission capability is expected to be available by July 1, 1984.
 - c) An integrated system to support NUREG 0696 - Final Report, Reg. Guide 1.97, and Reg. Guide 1.23 requirements for the SPDS, TSC, EOF, and NDL is expected to be operational by July 1, 1984. Detailed commitments for data will be provided to NRC when Reg. Guides 1.23 and 1.97 are finalized.
5. The on-shift organization will be staffed and trained to meet the requirements of Table III.A.1.2-1 of NRC generic letter 81-10 (same as Table B-1 to NUREG-0654, Rev. 1).
6. Additional personnel will be available by a call-in procedure to supplement the on-shift organization in the areas of communication, radiological assessment, technical support, repair and corrective action and radiation protection. These personnel will be available within a thirty to sixty minute time frame.

7. The Technical Support Center will be manned and fully functional within a thirty to sixty minute time frame.
8. The Emergency Operations Facility will be manned and fully functional within four hours.

The above commitments deviate from the requirements as follows.

1. The ERCS will not be totally operational at the required date because of the unavailability of compatible equipment which meets all requirements. Therefore the intent of requirements in NUREG 0696 will be met by using a combination of the SPDS (which will be operational by October 1, 1982) and modifications to the plant process computer. This interim system will be in operation from October 1, 1982 until the integrated system is available.
2. NUREG 0737 (as issued by Generic Letter 81-10) requires 11 people to report to the site within thirty minutes of notification and an additional 15 within sixty minutes of notification. We cannot meet the 11 people within thirty minutes requirement due to the general housing location of plant personnel with respect to the site. The overwhelming majority of personnel live approximately thirty to thirty-five minutes driving time from the site. Further, taking into account the time it would take an individual to respond in the middle of the night plus possible adverse weather conditions, make it impossible to meet this requirement. Hence, our position is that the people as a whole will report within a thirty to sixty minute time frame. In support of this position, it should be noted that our on-shift complement presently by one and it is anticipated a full two unit staffing will exceed the requirements by approximately 3 to 5 people.
3. NUREG 0737 (as issued by Generic Letter 81-10) requires the recovery manager to report to the Emergency Operations Facility within one hour of notification. Our intent is that the recovery manager and his entire organization be staffed with personnel normally assigned to the Allentown General Offices. As such, the absolute minimum amount of time it would take a person to respond is in the order of two hours based on the driving time from the Allentown area to the site. Taking into account the mobilization effort required to put together the recovery organization, a middle of the night call in and potential adverse weather conditions, the most reasonable time that we can confidently commit to manning the Emergency Operations Facility is four hours. As an alternative to this position, we could commit to manning the EOF by utilizing the plant personnel. However, this has a major drawback in that it would severely dilute the organization of the Emergency Director and limit his capability to place the plant in a safe shutdown condition. As such, it is felt that this alternative leads us in a less safe direction and is therefore unacceptable.



4. NUREG 0737 (as issued in Generic Letter 81-10) utilizes the title of Health Physics Technician for those personnel who are to respond to perform in-plant, on-site and off-site radiological surveys. It is our intent that only Health Physics Technicians or other suitably qualified plant personnel will be used for in-plant surveys. However, we intend to use personnel from our Division forces to perform on-site (out-of-plant) and off-site surveys. These people will not be Health Physics Technicians in the context of the definitions presented in ANS 3.1 but will be people fully trained and qualified to perform on-site and off-site radiological surveys and sample collection.

NUREG 0694 Commitments

1. The Interim Technical Support Center will be functional by Unit #1 fuel load in accordance with NUREG 0694.
2. The Operational Support Center will be functional by Unit #1 fuel load in accordance with NUREG 0694. NUREG 0696 - Final Report will be used as a design guide.
3. The Interim Emergency Operations Facility will be functional by Unit #1 fuel load in accordance with NUREG 0694.

