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 AUTH. NAME: CURTIS, N.W. AUTHOR AFFILIATION: Pennsylvania Power & Light Co.  
 RECIPIENT NAME: SCHWENCER, A. RECIPIENT AFFILIATION: Licensing Branch 2

SUBJECT: Notifies that installation of addl control room dc power sys indication & alarms imposed by SER Section 8.3.2 is not required in either IEEE 3.8-1974 std or Reg Guide 1.47. Present procedures comply w/intent of SER requirements.

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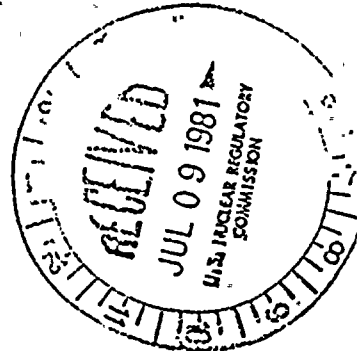
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**PP&L**

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NORMAN W. CURTIS  
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JUL 06 1981



Mr. A. Schwencer, Chief  
Licensing Branch Number 2  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION  
CONTROL ROOM DC INDICATION  
ER 100450                      FILE 841-2  
PLA-860

DOCKET NOS. 50-387  
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Dear Mr. Schwencer:

The Susquehanna SER section 8.3.2 imposes a new requirement on Susquehanna SES to have additional DC power system indication and alarms installed in the plant control room. This new monitoring requirement was not identified to us prior to the writing of the SER. Also, the new DC system requirement was not identified as an outstanding issue in Section 1.9 of the SER but was imposed as a license condition.

Susquehanna has fully complied with the design requirements embodied in IEEE 308, 1974 and Regulatory Guide 1.47 for DC system monitoring. In neither the IEEE standard nor Regulatory Guide 1.47 is the requirement to install the specific equipment in the Control Room, as the NRC states. Susquehanna's design has followed a logical approach in this monitoring scheme as well as in many others. For a system in which the operator has been provided no remote control and must send an operator to take local control, a general trouble alarm has been provided in the control room. Upon receiving a group trouble alarm, the operator will send someone to the DC room to decipher the problem and to take correcteive actions. This scheme is in full compliance with the referenced standards.

In addition to complying with our commitments, the scheme contributes to the overall goal of minimizing unnecessary equipment and annunciation in the control room. This is an important goal of human factors engineering.

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To augment the DC system monitoring, PL's operating staff currently plans to check the operational readiness of the DC system by local visits and recording vital data every 8-hour shift. This scheme provides the same level of surveillance to assure DC system availability as would an indication scheme applied in the control room.

We do agree that the additional trouble alarms cited in this section merit a review for implementation. In summary, Susquehanna's DC surveillance complies with the requirements of the IEEE 308-1974 standard and Regulatory Guide 1.47. In addition, it fully meets the intent of the NRC's requirements stated in the SER and contributes to human factors engineering goals.

PP&L identified our position on this item in an SER meeting in Bethesda, MD on April 14, 1981. During this meeting our NRC Project Manager took as an action item to review Susquehanna's position. We have received no feedback on the progress of the NRC review.

PP&L will be available to meet to discuss and resolve this item.

Very truly yours,

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

CTC/mjm

cc: R. M. Stark      NRC

