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SUBJECT: Describes efforts taken re SER open items on emergency planning. Items addressed: emergency offsite facility operation emergency action levels notification of unusual event & dose assessment.

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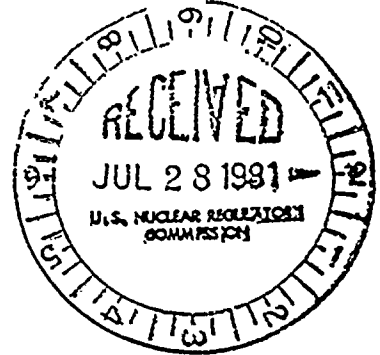
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July 21, 1981

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



SUSQUEHANNA STEAM ELECTRIC STATION
SER OPEN ITEMS ON EMERGENCY PLANNING
ER 100450 FILE 841-2
PLA-887

Dear Mr. Schwencer:

SER open items 101, 102 and 103 were further clarified in the SER Supplement No. 1. The NRC, in Appendix D of the Supplement, has outlined the additional information required from us for the NRC to complete their review. The following information describes our efforts on each of these items.

1. EOF Operation - PP&L has described in the Susquehanna Emergency Plan its commitment to have the EOF manned and fully functional within four hours of the declaration of a site or general emergency. This commitment is based on two major factors:
 - a) The lines of authority and responsibility are clearly defined giving the Emergency Director the authority for making off-site protective action recommendations. Initially, the shift supervisor functions as Emergency Director until relieved by the Superintendent of Plant which occurs within 30 to 60 minutes following declaration of an emergency. The Emergency Director will then perform his function from the Technical Support Center where he has "hot line" communications available to Federal, state and local response agencies. The Emergency Director's functions are removed from the control room at this point. When the Recovery Manager arrives and the EOF is activated, responsibility for making off-site protective action recommendations transfers to the Recovery Manager.

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Mr. A. Schwencer
Page 2
July 21, 1981

With this arrangement, PP&L has full decision-making and communications capability for the time span of the emergency, without hindering control room activities necessary to return the plant to a safe condition.

- b) The Recovery Manager will be a senior management representative from the corporate office in Allentown. This individual can report to the EOF in less than four hours. However, PP&L cannot make a commitment for the Recovery Manager to arrive in less than one hour because of the distance involved and possible adverse weather conditions. It should be noted that our plans and intents are to man the EOF as soon as possible.
2. Emergency Action Levels - PP&L will expand and identify in more specific detail certain EAL's. The NRC must, however, identify which EAL's they want expanded. We have been unable to identify these from the description in the SER Supplement or from subsequent discussions with the staff.
3. Notification of Unusual Event - PP&L will modify page 4-3 of the Emergency Plan to incorporate the following words in Section 4.1.1:
- "Notification of LCCD, CEMA, PEMA, NRC and PP&L Headquarters shall commence within 15 minutes of the declaration of an Unusual Event."
4. Dose Assessment Procedures - By August 17, 1981, PP&L will be able to provide a full description of the PP&L dose assessment program. This program will incorporate three primary features. First, dose calculations will be performed by a computerized emergency radiation dose projection system based on a Class A atmospheric dispersion model. This model will utilize fixed terrain correction factors to take into account deviations in plume dispersion caused by the topography of the Susquehanna area.

Secondly, a manual dose projection method will be available in the event of loss of the automatic system. This manual system will utilize a series of whole-body and thyroid dose overlays, which, when applied to area maps, yield factors which can be used to calculate dose rates at any point in the 10-mile EPZ upon determination of source terms and meteorological conditions.

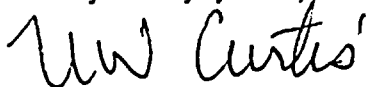
Dose projections by either method will be verified by off-site monitoring teams which will perform surveys at locations in the EPZ as directed by the Radiation Support Manager. As many as five two-man monitoring teams will be activated at one time following an accident to provide real-time off-site data to update calculational assumptions and update or verify dose projections.

Mr. A. Schwencer
Page 3
July 21, 1981

5. Decontamination Facilities and Procedures - Health physics surveys will be performed on individuals evacuated from the site. Surveys for potential contamination shall consist of using hand-held friskers to monitor personnel including shoes and hands. If personnel decontamination is required, the personnel will be properly transported to the personnel decontamination facility at the EOF. The EOF is provided with personnel decontamination showers, hold-up tank, personnel monitors and radiological access control system. A detailed description of this facility will be added to the Emergency Plan.
6. Thyroid Blocking Agents - Potassium Iodide utilization for iodide prophylaxis shall require the approval of the Emergency Director in consultation with the Radiation Protection Coordinator and medical consultants. It is recommended that potassium iodide only be administered in situations where potential exposure of the thyroid may exceed 25 rem.
7. Evacuation Time Estimates - PP&L has committed to perform an additional study of evacuation times conforming to Appendix 4 of NUREG-0654. We expect to submit this study by September 1, 1981.
8. Authorization of Doses in Excess of Limits - The onsite authority to authorize doses in excess of 10 CFR 20 limits rests with the Emergency Director throughout the emergency condition. The Emergency Plan will be revised to include this clarification.
9. Emergency Response Facilities - The conceptual design of the emergency response facilities is described in Appendix I of the Susquehanna Emergency Plan. We believe this design meets the guidance contained in NUREG-0696, however, we have not received any comments from NRC on this submittal.
10. Alert and Notification System - PP&L has committed to installing this system prior to fuel loading. Installation at this point in time is about 90% complete.
11. Public Education/Information - PP&L has committed, in Section 8.4 of the Emergency Plan, to providing public education material to the population within the 10-mile EPZ. Drafts of this material will be submitted for NRC review by September 15, 1981.

We would be pleased to meet with the NRC staff to discuss these issues.

Very truly yours,



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

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