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SUBJECT: Clarifies util philosophy & position re manning of emergency operation facility following incident. Overall approach to emergency planning examined. Verification of plan integrity to culminate in full scale exercise scheduled for Mar 1982.

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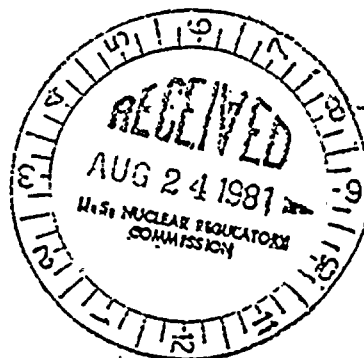
**Pennsylvania Power & Light Company**

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Norman W. Curtis  
Vice President-Engineering & Construction-Nuclear  
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August 19, 1981

Mr. A. Schwencer, Chief  
Licensing Branch No. 2  
Division of Project Management  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555



SUSQUEHANNA STEAM ELECTRIC STATION  
EOF OPERATION  
ER 100450 FILE 841-2  
PLA-909

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Dear Mr. Schwencer:

This letter serves to further clarify PP&L's philosophy and position regarding manning of our Emergency Operation Facility (EOF) following an incident.

In order to place this issue in proper perspective, it is first necessary to examine our overall approach to emergency planning. Our approach is based on the provision of adequate staffing, the orderly transfer of responsibility and the existence of efficient support facilities.

As such, the initial thrust of our emergency staffing efforts is to provide a supplemental organization, headed by an Emergency Director and headquartered outside of the control room so as to relieve the on-shift organization of all peripheral duties and allow them to concentrate on in-plant operational activities. This organization will be available within 30 to 60 minutes of notification and is capable of performing all assessing, correcting, controlling, and advising functions for an indefinite period of time. I hasten to point out, however, that it is not our intent that they do so, but rather, we want to assure that they have the capability such that our emergency response efforts would not suffer due to an unanticipated, prolonged delay in manning the EOF. The Emergency Director's organization is composed of three major sections. An operations organization which is responsible for bringing the plant to a stable condition, a technical organization which supports the operations organization and a radiological organization which provides both in-plant health physics monitoring and off-site dose projections. The Emergency Director serves as a manager. He overviews the three functions, assures efforts are being exerted properly to assure both plant and public safety and is responsible for making off-site public protection recommendations based upon his evaluation of the situation.

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Mr. A. Schwencer  
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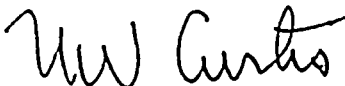
Our plan calls for manning of the EOF as quickly as possible, to provide long term technical and radiological support and to relieve the emergency director of the off-site interface. The EOF will be manned with personnel normally stationed in our Allentown General Office. For the most part, these personnel can report to the EOF within one and one-half to two hours. Only in the advent of severe adverse weather conditions would that time be materially extended. To offset the potential for manning time extension, emergency vehicles will be available to transport personnel from the Allentown vicinity to the site. These vehicles will be four wheel drive vans, or their equivalent, and, in the case of the Recovery Manager's vehicle, will be equipped with a radio capable of communicating with the site. Additionally, PP&L owned heavy duty trucks are available within five miles of the Allentown General Office should they be needed for transportation services.

In order to assure rapid and efficient manning of the EOF, a two stage activation process will be utilized. Concurrent with notification of an incident which requires manning the EOF, the on site security forces will activate the EOF. This activation will consist of making the building and its associated equipment capable of use on an immediate basis. Within 30 to 60 minutes of notification, an Emergency Operation Facility Coordinator will arrive. His function will be to assure the orderly transition of functions from the Technical Support Center to the Emergency Operations Facility. During the early stages of the incident it may be possible to transfer the communications and radiological assessment functions to the EOF prior to the arrival of the Recovery Manager. This determination would be made by the Emergency Director. The Emergency Director would continue to be responsible for those functions; however, the EOF Coordinator would serve as a focal point and thus not only provide transitional guidance but also serve to assist the Emergency Director. Considering our ability to normally man the EOF in under two hours, the character of the organization manning the Technical Support Center and all necessary emergency functions are provided, we believe our deviation from the one hour manning (decision maker) recommendation is of minor significance.

We intend to verify the capability of our plans through a series of drills which will culminate in a full scale exercise in March, 1982. Naturally, should this portion or any portion of our plans prove unworkable, prompt corrective action would be initiated.

If further clarification is required, we would be pleased to meet with the NRC staff as necessary.

Very truly yours,



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

WEB/mks

cc: R. M. Stark - USNRC  
S. Chesnut - USNRC

