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RECIP.NAME RECIPIENT AFFILIATION
SCHWENCER,A. Licensing Branch 2

SUBJECT: Clarifies cover ltr to Rev 7 to emergency plan (PLA-1940). Details provided for manning emergency operation facility (EOF) & activation of backup EOF.Unit 2 fuel load scheduled for 840326.Expeditious approval requested.

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MAR 13 1984

Director of Nuclear Reactor Regulation
Attention: Mr. A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION
CLARIFICATIONS OF EOF OPERATION
ER 100450 FILE 841-1
PLA-2109

Docket Nos. 50-387
50-388

Dear Mr. Schwencer:

The following is for the purpose of clarifying PP&L's previously submitted cover letter concerning Revision 7 to the Susquehanna SES Emergency Plan (PLA-1940). This clarification is provided as an outgrowth of PP&L's discussions with F. Pagano, F. Kantor, G. Simonds, and M. Haughey of the NRC staff, on February 27, 1984. The two areas requiring clarification are: manning of the Emergency Operations Facility and activation of the Backup EOF.

Manning of the EOF

The EOF is activated automatically upon declaration of a "Site" or "General" Emergency (the Emergency Director or Recovery Manager can, at their discretion, elect to man the EOF at any lower emergency classification). Upon activation, two response organizations are called out: a site-based organization led by the EOF Support Manager will respond within 30-60 minutes and a corporate based organization led by the Recovery Manager will respond within 2-3 hours, taking into account severe weather conditions.

Prior to Revision 7 of the SSES Emergency Plan, the EOF Support Manager, upon his arrival at the EOF, assumed responsibility for Overall Emergency Management and Offsite Radiological Assessment activities until relieved by the Recovery Manager and Radiological Support Manager respectively. Revision 7 of the plan states that the EOF Support Manager will assume responsibility for Offsite Radiological Assessment activities upon his arrival at the EOF with responsibility for Overall Emergency Management being retained by the Emergency Director in the TSC until the Recover Manager arrives at the EOF. The primary reason for this change is to reduce the number of turnovers for the Overall Emergency Management responsibility thereby reducing the probability of confusion or data loss at a time most critical to the understanding of the unfolding events. Drills conducted during 1982 and 1983 have shown the extra turnover to be (at times) an impediment to ensuring

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continuity of emergency management functions such as classification and protective action decision making responsibilities.

It is the initial role and responsibility of the EOF Support Manager that we wish to expand upon. The EOF Support Manager shall assume responsibility for all Offsite Radiological Assessment activities. This includes: offsite radiological monitoring team control, dose projections, radiological updates to the PA DER Bureau of Radiation Protection (BRP), and protective action recommendation definition and transmittal to BRP. Prior to transmitting this recommendation to BRP, the EOF Support Manager shall discuss and get the concurrence of the Emergency Director in the TSC. This concurrence is necessary to ensure the latest plant conditions are taken into account in the decision making process. With the concurrence of the ED, the EOF Support Manager shall transmit the recommendation to BRP. In the absence of BRP activation or inability to contact BRP, this recommendation can be transmitted directly to the Risk Counties. The primary method of transmitting this information is via "Hotline" telephone communications with backup to BRP via standard telephone and backup to Risk Counties via standard telephone and radio.

The arrival of the corporate response organization represents an optimization of resources with the Radiological Support Manager relieving the EOF Support Manager of Offsite Radiological Assessment activities and the Recovery Manager relieving the Emergency Director of the overall emergency management responsibility. At this point, protective action recommendation decisions will be made by the Radiological Support Manager, and with the concurrence of the Recovery Manager, he will then transmit them to BRP.

Based on the above discussion, we believe our objective of relieving plant personnel of offsite responsibilities as early as reasonably achievable in emergency situations is met. The ED and TSC personnel are relieved of this burden within 30-60 minutes thus allowing them to focus their attention on mitigating the condition(s) in-plant causing the emergency. The ED's responsibility to concur with protective action recommendation decisions is a logical step in the process of ensuring this decision takes into account all factors associated with this decision. PP&L believes revision 7 of the Emergency Plan does not reduce our commitment to Public Health and Safety and in fact assures that decisions regarding the Public are timely and accurate.

Backup EOF

If emergency conditions are such that it is necessary to activate the Backup Emergency Operations Facility, located in PP&L facilities in Hazleton, PA, approximately 15 air miles from the Susquehanna Steam Electric Station, all EOF functions shall be transferred to the Backup EOF, except the function of Technical Support. Technical Support shall be provided via PP&L's General Office Emergency Support Center in Allentown where plant drawings and ultimately a Safety Parameter Display System Terminal will be available. All offsite radiological assessment, protective action decision making, notification and overall emergency management activities will be conducted in

the Backup EOF. This change in approach to providing backup EOF functions has no impact on the functioning of the TSC.

With Fuel Load for Susquehanna Unit 2 scheduled for March 26, 1984, PP&L would appreciate your approval of this concept of Emergency Plan operations as quickly as possible. This proposed change had been submitted to the NRC with PP&L's response to SECY 82-33 in April of 1983.

If you have any questions regarding this letter, please contact S. H. Cantone at (215) 770-7942.

Very truly yours,

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

cc: R. L. Perch USNRC
F. G. Pagano USNRC
F. Kantor USNRC