

SAFEGUARDS INFORMATION



Pennsylvania Power & Light Company

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Harold W. Keiser
Vice President-Nuclear Operations
215/770-7502

OCT 17 1986

Director of Nuclear Reactor Regulation
Attention: Ms. E. Adensam, Project Director
BWR Project Directorate No. 3
Division of BWR Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION
PROPOSED AMENDMENT 87 TO NPF-14 AND
PROPOSED AMENDMENT 43 to NPF-22
PLA-2743 FILE R41-2/A17-12

Docket Nos. 50-387
and 50-388

Dear Ms. Adensam:

The purpose of this letter is to request approval in accordance with 10CFR50.90 of Change X to the Susquehanna SES Physical Security Plan (PSP). Prompt approval is requested in order to prevent unnecessary expenditures for security clearance updates which will otherwise be required beginning in January 1987. Upon approval, please amend License Condition 2.D of NPF-14 and NPF-22 to include Change X and the following revisions of the PSP:

Change T, dated January 15, 1985 (transmittal letter dated January 15, 1985)

Change U, dated March 15, 1985 (transmittal letter dated March 15, 1985 as amended by letter dated May 17, 1985)

Change V, dated October 3, 1985 (transmittal letter dated October 14, 1985 as amended by letter dated March 26, 1986)

Change W, dated July 15, 1986 (transmittal letter dated July 22, 1986)

The License Conditions should also be amended to include the following revisions to the Security Training and Qualification Plan:

Change C, dated January 31, 1984 (transmittal letter dated March 15, 1984)

Change D, dated May 28, 1985 (transmittal letter dated June 10, 1985)

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SAFEGUARDS INFORMATION

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This document was determined to contain safeguards information by:	
<u>Ray Harris / Sr Lic Spec / 447</u>	
(Name, Title, Cost Area or Organization)	
Date of Determination:	<u>10/14/86</u>
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The substance of the changes involve two items:

- o Eight-year updates of security clearances would be discontinued. New provisions would provide for updating a security clearance when there is cause to suspect adverse changes in an employee's trustworthiness or reliability.
- o The Condensate Transfer and Storage System would be deleted from the list of vital equipment.

Security Clearance Updates

PP&L originally planned to update employee security clearances every five years. A change to the plan extending the update frequency to eight years was approved by NRC in 1984. Prior to NRC approval of the change, PP&L completed eighty-five (85) updates at an average cost of \$215 each. Significant adverse information was identified in only one case. In this case, the employee's clearance was suspended based on information provided by the employee. The clearance was reinstated after additional psychological and psychiatric evaluations. In contrast, actual experience with PP&L's Continual Behavior Observation Program (CBOP) indicates that approximately ten (10) employees are referred annually. We believe that this is adequate evidence of an effective CBOP. It is clear that significant adverse information is much more likely to be identified through the CBOP than through routine security clearance updates. In addition, a survey of other nuclear utilities in NRC Region 1 indicates that only one other utility program includes security clearance updates. Security clearance updates exceed the requirements and guidance provided in NRC regulations, proposed regulations, and the NUMARC guidelines for access authorization.

The cost of a routine security clearance update program is substantial. Based on security clearances processed in 1985, PP&L estimates that the average cost of an update would be approximately \$277. When employee man-hours are added to this figure, we expect that the true cost of a security clearance update approaches \$500. Approximately 2600 employees would be expected to undergo security clearance updates during an eight-year cycle. This results in a program cost exceeding \$6 million in 1985 dollars over the life of the facilities. PP&L does not believe that this expense is necessary or justified. The objective of updating security clearances is to provide reasonable assurance of continued reliability and trustworthiness. The CBOP has the same objective. The security clearance process is effective in identifying significant adverse information during initial screening. However, based on PP&L's experience, the CBOP is far more effective as an ongoing program. Since security clearance updates are not required by NRC, it is clear that the CBOP is the intended process for identifying adverse situations as they develop.

Vital Equipment List

The vital equipment list provided in the Physical Security Plan erroneously identifies the Condensate Transfer and Storage System as being vital.

According to 10CFR73.2(i), "vital equipment" is defined as "any equipment, system, device, or material, the failure, destruction, or release of which could directly or indirectly endanger the public health and safety by exposure to radiation." In addition, "equipment or systems which would be required to function to protect public health and safety following such failure, destruction, or release are also considered to be vital."

The Condensate Transfer and Storage System provides a source of clean water for several safety systems such as HPCI, RCIC, and Core Spray. However, the system is not safety-related and has no safety-related functions. While it provides the preferred source of water for testing and normal operation, the safety-related source of water is the suppression pool.

NO SIGNIFICANT HAZARDS CONSIDERATIONS

- I. The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.
 - A. No FSAR accident analysis takes credit for the security provisions contained in the Physical Security Plan. The Physical Security Plan provides a basis for having assurance that acts of radiological sabotage will not significantly impact public health and safety. Initial security clearance investigations followed by continual behavior observation are adequate to determine the reliability and trustworthiness of employees. This is all that is currently required for contractor personnel at PP&L's facilities.
 - B. Changes involving the vital equipment list are administrative in nature since the equipment being removed from the list is not vital and serves no safety-related function. There are no design or procedural changes involved.

Therefore, these changes do not involve an increase in the probability or consequences of an accident previously evaluated.

- II. The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.
 - A. NRC regulations do not require that security clearances be updated. In fact, PP&L contractor personnel are not currently required to have their security clearances updated. Removing this requirement from PP&L employees places them on the same footing as our contractor personnel. There is no reason to believe that PP&L employees are any less reliable or trustworthy than contractor personnel.
 - B. As stated above, no design or procedural changes are involved with the changes to the vital equipment list.

Therefore, these changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

III. The proposed changes do not involve a significant reduction in margin of safety.

- A. Continual behavior observation has been demonstrated to be far more effective than security clearance updates in identifying significant changes in employee circumstances related to reliability and trustworthiness.
- B. The Condensate Transfer and Storage System has no safety-related function. Its interfaces with safety-related systems can not adversely affect the performance of the safety functions of those systems.

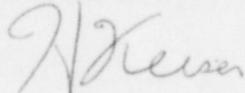
Therefore, margins of safety are not significantly reduced.

Attached are six (6) copies of Change X to the PSP. Pursuant to 10CFR73.21, these should be protected from unauthorized disclosure.

Pursuant to 10CFR50.91(b)(1), copies of this application (without Change X) have been provided to the state.

Requests for additional information should be directed to Mr. R. M. Harris (215) 770-7862. Pursuant to 10CFR170.21, the appropriate fee is enclosed.

Very truly yours,



H. W. Keiser
Vice President-Nuclear Operations

Attachments
Affidavit

cc: Mr. Thomas M. Gerusky, Director w/o Change X
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Mr. W. Kushner - USNRC w/o Change X