

Robert G. Byram  
Senior Vice President  
Generation and Chief Nuclear Officer  
Tel. 610.774.7502 Fax 610.774.5019  
E-mail: rgbyram@papl.com

PP&L, Inc.  
Two North Ninth Street  
Allentown, PA 18101-1179  
Tel.: 610.774.5151  
<http://www.ppl-inc.com/>



NOV 19 1999

U. S. Nuclear Regulatory Commission  
Attn.: Document Control Center  
Mail Station OP1-17  
Washington, D.C. 20555

**SUSQUEHANNA STEAM ELECTRIC STATION  
RESPONSE TO GENERIC LETTER 99-02  
“LABORATORY TESTING OF NUCLEAR-GRADE  
ACTIVATED CHARCOAL”  
PLA-5128**

---

**Docket Nos 50-387  
and 50-388**

*Reference:*

*USNRC to Mr. R. G. Byram, License (Technical Specification/Improved Technical Specifications) Amendment No. 178 (Unit 1/NPF-14) and Amendment No. 151 (Unit 2/NPF-22), dated July 30, 1998.*

The purpose of this letter is to provide PPL, Inc.'s (PPL) response to Generic Letter 99-02, "Laboratory Testing of Nuclear-Grade Activated Charcoal." The NRC issued this generic letter in response to a concern that the testing of nuclear-grade charcoal by testing methods other than ASTM D3803-1989 "Standard Test Method for Nuclear-Grade Activated Carbon" does not provide assurance for complying with the current licensing basis as it relates to the dose limits of GDC 19 of 10CFR50 Appendix A.

The generic letter "Requested Action No. 1" requires a response from those licensees that have Technical Specifications that specifically require laboratory testing of charcoal samples in accordance with ANSI D3803-1989. This requested action states that:

"Within 180 days of the date of this generic letter, submit a written response to the NRC describing your current TS requirements for the laboratory testing of charcoal samples for each ESF ventilation system including the specific test protocol, temperature, RH, charcoal bed thickness, total residence time per bed depth, and penetration at which the TS require the test to be performed. If your current TS specifically require laboratory testing of charcoal samples in accordance with the ASTM D3803-1989 protocol at 30 °C [85 °F], and you have been testing in accordance with this standard, then you only need to address this requested action (i.e. no TS amendment or additional testing is required)."

A081

POB ADDAL 0500387

The Susquehanna SES Improved Technical Specifications (ITS) (Reference) requires compliance with the ASTM D3803-1989 standard. The ITS addresses the test protocol, including the temperature, penetration and relative humidity at which the testing is required to be performed. The applicable ITS section (5.5.7 c.) states:

“Demonstrate for each of the ESF systems that a laboratory test of a sample of the charcoal adsorber, when obtained as described in Section C.6.2 of Regulatory Guide 1.52, Revision 2, shows the methyl iodide penetration less than the value specified below when tested in accordance with ASTM D3803-1989 at a temperature of  $\leq 30^{\circ}$  C and greater than or equal to the relative humidity specified below:

ESF Ventilation System	Penetration (%)	R. H.
Standby Gas Treatment System	< 0.175	70
Control Room Emergency Outside Air Supply System	< 0.175	70

The Generic Letter also requested information related to the total residence time required by the test protocol used and the charcoal bed depth of the affected systems. This information is provided below:

ESF Ventilation System	Charcoal Bed Thickness	Total Residence Time
Standby Gas Treatment System	Eight (8) Inches	0.25 Sec/2 inch bed depth
Control Room Emergency Outside Air Supply System	Four (4) Inches	0.25 Sec/2 inch bed depth

Based on the above response, PP&L considers our actions in response to Generic Letter 99-02 complete.

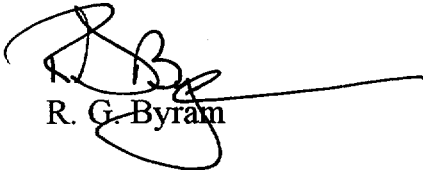
NOV 19 1999

- 3 -

Document Control Center  
PLA-5128

Please contact Mr. Robert D. Kichline at (610) 774-7705 if there are any questions concerning this response.

Sincerely,



R. G. Byram

copy: NRC Region I  
Mr. S. L. Hansell, NRC Acting Sr. Resident Inspector  
Mr. V. Nerses, NRC Sr. Project Manager