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JUL 18 2003

Mr. Samuel J. Collins  
Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**SUSQUEHANNA STEAM ELECTRIC STATION  
ANSWER IN RESPONSE TO APRIL 29, 2003, ORDER  
FOR COMPENSATORY MEASURES RELATED TO  
FITNESS-FOR-DUTY ENHANCEMENTS APPLICABLE TO  
NUCLEAR FACILITY SECURITY FORCE PERSONNEL (EA-03-038)  
PLA-5634**

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Dear Mr. Collins:

This letter was originally issued on June 2, 2003. However, PPL recently identified that the required oath or affirmation was inadvertently omitted. We are therefore resubmitting our response to satisfy this requirement; the content otherwise remains unchanged.

By this letter, PPL Susquehanna, LLC, hereby answers to the April 29, 2003, Order for Compensatory Measures Related to Fitness-For-Duty Enhancements Applicable to Nuclear Facility Security Force Personnel (EA-03-038) ("Order"). Pursuant to Section IV of the Order and 10 CFR §2.202, PPL Susquehanna, LLC requests an extension of time in which to submit information in response to the Order and to request a hearing. In addition, PPL Susquehanna, LLC requests the NRC provide certain information to ensure PPL Susquehanna, LLC fully understands the underlying bases of the Order and, therefore, can most effectively implement its individual requirements.

Section II of the Order states that, "[t]he Commission has determined that the security measures addressed by the enclosed compensatory measures are required to be implemented by licensees as prudent measures to address issues that may arise from work-hour related fatigue of nuclear facility security force personnel." The Order does not explain the bases for the specific limits and other requirements described in the Order in sufficient detail for PPL Susquehanna, LLC to understand the rationale for the requirements. PPL Susquehanna, LLC therefore requests that the NRC provide: the bases for the specific limits prescribed in the Order; the bases upon which it relied to establish a linkage between the specific limits chosen and any causal relationship to fatigue that

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would otherwise occur if those individual or group work hour limits were to be exceeded; and information pertaining to any events or incidents where the NRC has determined that fatigue was the cause or a major contributing factor in those events or incidents.


As provided for in Section IV of the Order, good cause for granting an extension of time to respond to the Order and to request a hearing is shown in that no basis or rationale for the Order has been demonstrated. Thus, PPL Susquehanna, LLC requests that the Director, Nuclear Reactor Regulation extend the time periods for responding to the Order (including, specifically, Sections B.1 and 2) and for requesting a hearing be extended from the time period specified in the Order until 35 days after the date that the NRC provides the bases for the work hour limits in the Order. Section III. C. of the Order requires that "[a]ll licensees shall within thirty-five (35) days of the date of this Order, submit to the Commission a schedule for achieving compliance with each requirement described in Attachment 2 of the Order. Subject to the foregoing request for information concerning the bases for the Order and the request for an extension of time in accordance with Section IV, PPL Susquehanna, LLC will achieve compliance with all applicable requirements not later than October 29, 2003.

PPL Susquehanna, LLC also hereby confirms its understanding that the Commission intends to exercise enforcement discretion to accommodate issues which may arise as licensees, in good faith, take reasonable actions to implement the specific requirements of this Order. We further understand that the Commission will exercise enforcement discretion for the period necessary to resolve such issues and to integrate the requirements of this Order with the orders issued February 25, 2002, as well as with other pertinent regulatory requirements, and our safeguards contingency plans, security plans and security officer training and qualification plans.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 7/18/03

Respectfully submitted,



Bryce L. Shriver  
Sr. Vice President and Chief Nuclear Officer

copy: NRC Region I  
Mr. R. V. Guzman, NRC Project Manager  
Mr. S. Hansell, NRC Sr. Resident Inspector  
Mr. R. Janati, DEP/BRP