



Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101 • 215 / 770-5151

Norman W. Curtis
Vice President-Engineering & Construction-Nuclear
215 / 770-5381

JUN 14 1982

Mr. George H. Smith, Director
Division of Emergency Preparedness
and Operational Support
United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

SUSQUEHANNA STEAM ELECTRIC STATION
EMERGENCY PREPAREDNESS APPRAISAL RESPONSE
ER 100450 FILE 896
PLA-1130

Docket Nos. 50-387
50-388

Gentlemen:

Subject: Inspection 50-387/82-12

This reply refers to your letter of May 24, 1982 relating to matters reviewed and discussed by members of the Pennsylvania Power and Light Company Staff and members of the NRC Emergency Preparedness Appraisal Implementation Team. The following is a summary status of those actions committed to being complete prior to fuel loading for the Susquehanna Steam Electric Station:

1. Revise the list of alternate EOF Support Managers to include personnel at levels of management who can meet the EOF Recovery Manager Qualifications, and provide the required training to those individuals.

Status - Two additional EOF Support Managers have been identified who satisfy the EOF Recovery Manager Qualifications. The individuals are Robert H. Featenby, Assistant Project Director-Susquehanna and Stephen L. Denson, Project Construction Manager-Susquehanna. Training for these individuals is 90% complete with the remainder scheduled to be completed by June 14, 1982.

2. Complete all Emergency Preparedness Implementing Procedures, including management approval and issuance.

JUN 14 1982

Page 2

SSES 7LA-1130
ER 100450 File 896
Mr. George H. Smith

Status - Thirty-two of the presently identified thirty-five Emergency Preparedness Implementing Procedures have been reviewed by PORC and approved by the Superintendent of Plant-Susquehanna. Approval and Issuance of all procedures is scheduled for completion by June 25, 1982.

3. Provide training for a sufficient number of individuals in the emergency organization. This training shall focus on the Emergency Preparedness Implementing Procedures and on the specific functional duties assigned to each individual.

Status - Approximately 40% of the required pre-fuel load training identified during the appraisal has been completed. Attachment A is a copy of the Emergency Preparedness Training Matrix with this required training circled. Attachment B lists the training completed and the schedule for completion of all required training.

4. Complete the purchase, testing, and distribution of the pagers which will be used for staff augmentation, and demonstrate by unannounced drills that the additional specified persons in the proposed staffing plan can be onsite in about 30 or 60 minutes after initial notification. Records must be kept for these drills.

Status - All pagers have been purchased, distributed and tested satisfactorily. Documentation on the announced and unannounced tests conducted during the week of May 10, 1982 are available for NRC review. Permanent on-call rotation for emergency response personnel will be established approximately one week prior to fuel load.

5. Revise the Implementing Instructions to clearly indicate to the Emergency Director his responsibility for making initial offsite protective action recommendations.

Status - EP-IP-002, Emergency Management Notifications, has been revised to clearly indicate to the Emergency Director this responsibility. This revised and approved procedure is available for review.

6. Develop Emergency Action Levels (EALs) based on actual and projected plant status and conditions and on the potential for radioactive releases to the environment.

JUN 14 1982

Page 3

SSES PLA-1130
ER 100450 File 896
Mr. George H. Smith

Status - EP-IP-001, Emergency Classification, has been revised and will be approved in accordance with the schedule for item 2 above. Attachment C lists the NRC EAL comments, PP&L's resolution and the rationale for applicable EAL's.

7. Complete the installation, testing and calibration of the post-accident sampling system for reactor coolant and containment atmosphere. Train personnel in use of the system.

Status - Preoperational testing on the Post Accident Sampling System started on June 1, 1982. The primary constraint to testing completion is the delivery and installation of a suppression pool sample line flow indicator. Forecast completion and turnover of this system is assessed to be June 18, 1982 with training to be completed the week of June 21, 1982.

8. Ensure that all emergency equipment, supplies, kits, and facilities (such as decontamination facilities) used by emergency response personnel and emergency response teams are completed, stocked, and available at the proper locations.

Status - Approximately 75% of all emergency equipment as identified by EP-IP-101 is in place. All equipment is scheduled to be in place by June 15, 1982.

9. Complete the installation and testing of the public prompt notification system. The test shall be an integrated "operability" test of the installed systems and shall be activated from the location specified in the emergency procedures. The test is intended to confirm that the integrated system can operate properly upon activation. Results of the test shall be documented.

Status - A full "operability" test of the public prompt notification system was completed on June 4, 1982. Documentation confirming the operation of 101 of 109 sirens tested is available for NRC review. The eight sirens which failed to operate satisfactorily will be repaired and tested individually via a growl test. The results of a modified phone verification survey and remote area observation survey will be available by June 14, 1982.

Based upon this status report, a follow-up review of the appraisal findings requiring a site visit by NRC Region I personnel can be scheduled for the

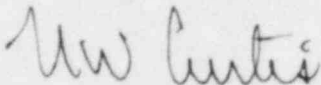
JUN 14 1982

Page 4

SSES PLA-1130
ER 100450 File 896
Mr. George H. Smith

week of June 21, 1982. Please contact C. R. Wike, (717) 542-2181 extension 233, to confirm arrangements for this site visit.

Very truly yours,



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

CRW/NWC/mks

Attachments

cc: R. M. Perch	U.S. NRC, Bethesda
H. W. Crocker	U.S. NRC, Region I
R. W. DeFayette	U.S. NRC, Bethesda
G. Rhoads	U.S. NRC, SSES

Program tailored to meet individual needs.
 Includes First Aid
 FSAR specified requirements

Matrix Legend:
 - Required
 - Company Assigned
 - Suggested

Annual retraining

FSAR specified retraining

	Emergency Plan Overview (PP) Emergency Plan Overview (Off-site Agencies) Implementing Proc. Overview Implementing Proc. Specific Tabletop Exercises (See Note 1) Communications Equipment (See Note 1) Offsite Agency Emergency Plan Offsite Rad Dose Projection Dose Assessment & Protective Actions Public Information Overview Emergency Classification Onsite Rad Monitoring Offsite Rad Monitoring Damage Control Search & Rescue (See Note 2) Basic Radiation Seminar Plant Operations/Tour State Police/Security Interface Fire Co./Fire Brigade Interface Contaminated Injury-Ambulance Contaminated Injury-Hospital Emergency Plan Review & Update Post Accident Coolant Sampling Post Accident Vent. Sampling General Employee Training Health Physics Level II Initial Fire Brigade Training "Hands On" (See Note 3) Initial Fire Brigade Training SSSES Specific (See Note 3) Susq. Operating Fundamentals IRAT Program Public Speaking/Hostile Environment																										
COURSE NUMBER	EP 1	EP 2	EP 3	EP 4	EP 5	EP 6	EP 7	EP 8	EP 9	EP 10	EP 11	EP 12	EP 13	EP 14	EP 15	EP 16	EP 17	EP 18	EP 19	EP 20	EP 21	EP 22	EP 23	EP 24	EP 25	EP 26	EP 27
POSITION																											
Inshift Organization																											
Shift Supervisor	R		R	R	R*	R*	S*	R*	R*	S*	R*	R*											R*				
Unit Supervisor	R		R	R	R*	R*	S*	R*	R*	S*	R*	R*											R*				
Assistant Unit Supervisor	CA		CA	R		CA*		S*	S*		CA*	R*											CA*				
Plant Control Operator	CA		CA	R		R*		S*	S*		CA*	R*											CA*				
Nuclear Plant Operator	S		S	R								R*			R*	R*							S*				
Auxiliary Systems Operator	S		S	R								R*			R*	R*							S*				
Shift Technical Advisor	S		S	R							CA*												S*				
Health Physics Technician	S		S	R				R*	R*			R*	R*		R*								S*				
Chemistry Technician	S		S	R				R*	R*			R*			R*								S*	R*	R*		
Security Supervisor	S		S	R																			S*				
Asst. Security Supervisor	S		S	R																			S*				
Security Controller	S		S	R											R*								S*				
Security Officer	S		S	R											R*								S*				

Program tailored to meet individual needs.
Includes First Aid
FSAR specified requirements

Matrix Legend:

- Required
- Company Assigned
- Suggested

Annual retraining

FSAR specified retraining

COURSE NUMBER

POSITION

Technical Support Center

	EP 1	EP 2	EP 3	EP 4	EP 5	EP 6	EP 7	EP 8	EP 9	EP 10	EP 11	EP 12	EP 13	EP 14	EP 15	EP 16	EP 17	EP 18	EP 19	EP 20	EP 21	EP 22	EP 23	EP 24	EP 25	EP 26	EP 27
Emergency Director	R		R	R	R*	R*	CA*	CA*	R*	CA*	R*	S*												R*			CA
Technical Support Coord.	R		R	R	R*																			R*			
Operations Coordinator	R		R	R	R*						R*													R*			
Rad Protection Coordinator	R		R	R	R*	R*	S*	R*	R*			R*												R*			
Security Coordinator	R		R	R	R*																			R*			
Administration Coordinator	R		R	R	R*																			R*			
Comm. & Records Coordinator	R		R	R	R*	R*																		R*			
Maintenance Coordinator	S		S	R											R*									S*			
ISC Coordinator	S		S	R											R*									S*			
TSC Technical Staff	S		S	R																				S*			
TSC Radiation Staff	S		S	R		R*		R*	R*			R*												S*			
Radio Communications Coord.	R		R	R	R*										R*	R*								R*			
TSC Administration Staff	S		S	R																				S*			

Program tailored to meet individual needs.
Includes First Aid
FSAR specified requirements

Matrix Legend:

- Required
- Company Assigned
- Suggested

Annual retraining

FSAR specified retraining

Program tailored to meet individual needs. Includes First Aid FSAR specified requirements	Emergency Plan Overview (P Emergency Plan Overview (Of site Agencies) Implementing Proc. Overview Implementing Proc. Specific Tabletop Exercises (See Note Communications Equipment (See Note 1) Offsite Agency Emergency Pla Offsite Rad Dose Projection Dose Assessment & Protective Actions Public Information Overview Emergency Classification Onsite Rad Monitoring Offsite Rad Monitoring Damage Control Search & Rescue (See Note 2) Basic Radiation Seminar Plant Operations/Tour State Police/Security Inter- face Fire Co./Fire Brigade Inter- face Contaminated Injury-Ambulanc Contaminated Injury-Hospital Emergency Plan Review & Up- date Post Accident Coolant Sampl. Post Accident Vent. Sampling General Employee Training Health Physics Level II Initial Fire Brigade Trainin "Hands On" (See Note 3) Initial Fire Brigade Trainin SSES Specific(See Note 3) Susq. Operating Fundamentals IRAT Program Public Speaking/Hostile En vironment																													
Matrix Legend: - Required - Company Assigned - Suggested	EP 1	EP 2	EP 3	EP 4	EP 5	EP 7	EP 8	EP 9	EP 10	EP 11	EP 12	EP 13	EP 14	EP 15	EP 16	EP 17	EP 18	EP 19	EP 20	EP 21	EP 22	EP 23	EP 24	EP 25	EP 26	EP 27				
Annual retraining																														
FSAR specified retraining																														
COURSE NUMBER	1	2	3	4	5	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27				
POSITION																														
Emergency Operations Facility																														
Recovery Manager	R		R	R	R*	R*	R*	CA*	R	R*												R*			R*	R*			R	CA
Site Support Manager	R		R	R	R*	R*	R*	CA*	R	R*												R*			R*	R*			R	CA
Site Support Staff	S		S	R																		S*			R*	R*				
Technical Support Manager	R		R	R	R*																	R*			R*	R*			R	
Technical Support Staff	S		S	R																		S*			R*	R*				
Radiation Support Manager	R		R	R	R*	R*	R*	R*	R*													R*			R*	R*			CA	
Radiation Support Staff	S		S	R	R*			R*	R*													S*			R*	R*				
Administration Support Mgr.	R		R	R	R*																	R*								
Administration Support Staff	S		S	R																		S*								
EOF Support Manager	R		R	R	R*	R*	R*	R*	R*	R*												R*			R*	R*			R	CA
EOF Support Setup Staff	S		S	R																		S*								
EOF Support Rad Staff	S		S	R																		S*			R*	R*				
EOF Support Tech Staff	S		S	R																		S*			R*	R*				

- Program tailored to meet individual needs.
- Includes First Aid
 - FSAR specified requirements

Matrix Legend:

- Required
- Company Assigned
- Suggested

Annual retraining

FSAR specified retraining

Program tailored to meet individual needs.	Emergency Plan Overview (PPE)	Emergency Plan Overview (Off-site Agencies)	Implementing Proc. Overview	Implementing Proc. Specifics	Tabletop Exercises (See Note 1)	Communications Equipment (See Note 1)	Offsite Agency Emergency Plan	Offsite Rad Dose Projection	Dose Assessment & Protective Actions	Public Information Overview	Emergency Classification	Onsite Rad Monitoring	Offsite Rad Monitoring	Damage Control	Search & Rescue (See Note 2)	Basic Radiation Seminar	Plant Operations/Tour	State Police/Security Interface	Fire Co./Fire Brigade Interface	Contaminated Injury-Ambulance	Contaminated Injury-Hospital	Emergency Plan Review & Update	Post Accident Coolant Sampling	Post Accident Vent. Sampling	General Employee Training	Health Physics Level II	Initial Fire Brigade Training "Hands On" (See Note 3)	Initial Fire Brigade Training Specifics (See Note 3)	Susq. Operating Fundamentals	IRAT Program	Public Speaking/Hostile Environment	
2. Includes First Aid	EP 1	EP 2	EP 3	EP 4	EP 5	EP 6	EP 7	EP 8	EP 9	EP 10	EP 11	EP 12	EP 13	EP 14	EP 15	EP 16	EP 17	EP 18	EP 19	EP 20	EP 21	EP 22	EP 23	EP 24	EP 25	GET-S	HP2	FB1	FB2	S-6	EP 26	EP 27
3. FSAR specified requirements																																
Matrix Legend:																																
R - Required																																
A - Company Assigned																																
S - Suggested																																
Annual retraining																																
FSAR specified retraining																																
COURSE NUMBER																																
POSITION																																
Media Operations Center																																
Public Information Manager	R		R	R		R*	CA*		CA*	R*												R*										
Public Info Media Rel. Staff	S		S	R						R*												S*										
Public Info Technical Staff	S		S	R						R*												S*										
																												</				

SUSQUEHANNA SES
EMERGENCY PREPAREDNESS
PRE-FUEL LOAD TRAINING

Group: Radiological Support

Subgroup: Rad Support Manager Staff
Training: EP 7 - Communications Equipment
To date: Training conducted for 9 members of IRAT - June 4, 1982
Status: Complete

Subgroup: HP Techs
Training: EP 9 - Offsite Rad Dose Projection (intensive)
EP 10 - Dose Assessment and Protective Action Recommendations
To date: EP 9 training conducted for 4 HP's - June 2, 1982
EP 10 training conducted for 2 HP's - June 4, 1982
To go: EP 9 training scheduled for 6 HP's - June 8, 1982
EP 10 training scheduled for 6 HP's - June 7, 1982
EP 10 training scheduled for 2 HP's - June 14, 1982
Status: 30% complete; FC complete - June 14, 1982

Subgroup: HP Rent-a-Techs
Training: EP 9 - Dose Projection
EP 10 - Dose Assessment and Protective Action Recommendations
To date: No training has been conducted as yet for HP Rent-a-Techs
To go: EP 9 training scheduled for an estimated (16) HP Rent-a-Techs -
June 15, 1982
EP 10 training scheduled for an estimated (16) HP Rent-a-Techs -
June 14, 1982
EP 13 training, (Onsite Monitoring), scheduled for an
estimated (16) HP Rent-a-Techs - June 14, 1982
EP 15 training, (Damage Control), scheduled for an estimated
(16) HP Rent-a-Techs - June 16, 1982
EP 16 training, (Search & Rescue/First Aid), scheduled for
an estimated (16) HP Rent-a-Techs - June 16, 1982
Status: 0% complete; FC complete - June 16, 1982

Group: Operations

Subgroup: Shift Supervisors, Unit Supervisors, Assistant Unit Supervisors
Training: EP 9 - Offsite Rad Dose Projection
EP 10 - Dose Assessment and Protective Action Recommendations
EP 12 - Emergency Classification
EPIP Action Steps
To date: EP 9 training conducted for 5 Operations Supervisors - June 1, 1982
EP 10 training conducted for 7 Operations Supervisors - June 4, 1982
EP 12 training conducted for 7 Operations Supervisors - June 4, 1982
EPIP Action Steps conducted for 7 Operations Supervisors - June 4 '82
To go: EP 9 training scheduled for 9 Operations Supervisors - June 10, 1982
EP 9 training scheduled for 6 Operations Supervisors - June 17, 1982
EP 10 training scheduled for 9 Operations Supervisors - June 7, 1982
EP 10 training scheduled for 4 Operations Supervisors - June 14, 1982
EP 12 training scheduled for 9 Operations Supervisors - June 7, 1982
EP 12 training scheduled for 4 Operations Supervisors - June 14, 1982

EPIP Action Steps training scheduled for 9 Operations Supervisors - June 7, 1982
EPIP Action Steps training scheduled for 4 Operations Supervisors - June 14, 1982
Status: 32% complete; FC complete - June 17, 1982

Subgroup: PCO's
Training: EP 13 - Onsite Rad Monitoring
EPIP Action Steps
To date: EP 13 training conducted for 7 PCO's - May 26, 1982
EP 13 training conducted for 5 PCO's - May 28, 1982
EP 13 training conducted for 3 PCO's - June 3, 1982
To go: EPIP Actions Steps for 15 PCO's - Date(s) not yet scheduled
Status: EP 13 training - 100% complete
EPIP Action Steps training - 0% complete; FC complete week of June 14, 1982

Subgroup: ASO's
Training: EP 13 - Onsite Rad Monitoring
EP 15 - Damage Control
EP 16 - Search & Rescue/First Aid

Subgroup: NPO's
Training: EP 16 - Search & Rescue/First Aid

To date: EP 13 training conducted for (15) unlicensed operators - May 8, 1982
EP 15 training conducted for (15) unlicensed operators - May 8, 1982
EP 16 training conducted for (15) unlicensed operators - May 8, 1982
To go: EP 13 training scheduled for (23) unlicensed operators - June 12, 1982
EP 15 training scheduled for (23) unlicensed operators - June 12, 1982
EP 16 training scheduled for (23) unlicensed operators - June 12, 1982
EP 16 training scheduled for (5) unlicensed operators - June 25, 1982
Status: 38% complete; FC complete - June 25, 1982

Subgroup: Operations Coordinator
Training: EP 12 - Emergency Classification
To date: None
To go: EP 12 training scheduled for (2) Operations Coordinators - June 14, 1982
Status: 0% complete; FC complete - June 14, 1982

Group: Chemistry Techs

Training: EP 24 - PASS
To date: None
To go: EP 24 for 10 Chemistry personnel - Date(s) not yet scheduled
Status: 0% complete; FC complete week of June 21, 1982

Group: Emergency Directors

Training: EP 10 - Dose Assessment and Protective Action Recommendations
EP 12 - Emergency Classification
To date: EP 9 training conducted for (1) Emergency Director -
June 1, 1982
EP 10 training conducted for (1) Emergency Director -
June 4, 1982
EP 12 training conducted for (1) Emergency Director -
June 4, 1982
To go: EP 9 training scheduled for (2) Emergency Directors -
June 10, 1982
EP 9 training scheduled for (1) Emergency Director -
June 17, 1982
EP 10 training scheduled for (1) Emergency Director -
June 7, 1982
EP 10 training scheduled for (2) Emergency Directors -
June 14, 1982
EP 12 training scheduled for (1) Emergency Director -
June 7, 1982
EP 12 training scheduled for (2) Emergency Directors -
June 14, 1982
Status: 25% complete; FC complete - June 17, 1982

Group: EOF Support Managers

Training: EP 7 - Communications Equipment
EP 9 - Offsite Rad Dose Projection
EP 10 - Dose Assessment and Protective Action Recommendations
To date: EP 1, 7, 9, 14, and 17 conducted for (3) EOF Support Managers
from June 1-4, 1982
To go: EP 10 training scheduled for (2) EOF Support Managers -
June 7, 1982
EP 10 training scheduled for (1) EOF Support Manager -
June 14, 1982
Status: 83% complete; FC complete - June 14, 1982

Group: Public Info Support Personnel

Training: EP 11 - Public Information Overview
To date: EP 11 training conducted for (16) PI Support personnel -
May 13, 1982
EP 11 training conducted for (50) PI Support personnel -
May 18, 1982
EP 11 training conducted for (7) PI Support personnel -
June 1, 1982
To go: EP 11 training scheduled for 6 PI Support personnel -
Date(s) not yet scheduled
Status: 92% complete; FC complete week of June 14, 1982

INCORPORATION OF COMMITMENTS
INTO EP-IP-001 REV 0

UNUSUAL EVENT

1. COMMENT: Initiating Condition 1 (ECCS initiation) - EAL should be based on flow in one or more ECCS systems.

RESOLUTION: The EAL in EP-IP-001, Rev. D, Attachment E, page 17 is satisfactory.

RATIONALE: Flow in an ECCS system is not the most appropriate EAL for this initiating condition. Valid initiation of an ECCS system even without injection is a more appropriate indication of potential degradation.
2. COMMENT: Initiating Condition 10 (fire) - any fire within plant lasting more than 10 minutes requires declaration of an Unusual Event.

RESOLUTION: Revision D to EP-IP-001 (Attachment E, page 26) incorporated the comment.
3. COMMENT: Initiating Condition 13b (flood or low water) - an EAL for low water should be added.

RESOLUTION: PP&L agreed to add an EAL for low water and revise the EAL for flood to provide a trigger value at a level (high and low) appropriate for an Unusual Event. (See EP-IP-001, Attachment E, page 27.)

(NOTE: Flood is no problem at SSES as per FSAR.)
4. COMMENT: Initiating Conditions 4, 5, 8 & 9 - Are not addressed.

RESOLUTION: The EAL in EP-IP-001, Rev. D, Attachment E, page 16 addresses these Initiating Conditions.

RATIONALE: Each of the specific parameters addressed in Initiating Conditions 4, 5, 8 and 9 have associated Limiting Conditions for Operation in the Susquehanna Tech. Specs. The EAL in EP-IP-001 is general enough to encompass these parameters and parameters not specifically mentioned in NUREG-0654

ALERT

1. COMMENT: Initiating Condition 10 (complete loss of any function needed for cold shutdown) - Reference to "loss of main

condenser with simultaneous loss of relief valves, ADS and RCIC" should be dropped.

RESOLUTION: Revision D to EP-IP-001 (Attachment E, page 39) incorporated the comment.

2. COMMENT: Initiating Condition 13 (fire) and 18c (explosion) - EAL is nonconservative in requiring fire or explosion to affect a safety system.

RESOLUTION: Revision D to EP-IP-001 (Attachment E, page 26) incorporated in the comment.

3. COMMENT: Initiating Condition 17c (tornado) and 17d (hurricane) - EAL's are nonconservative requiring tornado to strike plant vital structure.

RESOLUTION: PP&L agreed to revise both EALs to include specific trigger levels near the design basis levels. (See EP-IP-001, Attachment E, page 27.)

4. COMMENT: Initiating Condition 9 (coolant pump seizure) - Is not addressed.

RESOLUTION No EAL is required.

RATIONALE: A coolant pump seizure in a BWR is well analyzed and is not expected to result in fuel failure and therefore is not serious enough to be classified as an Alert.

SITE EMERGENCY

1. COMMENT: Initiating Condition 8 (loss of any function needed for plant hot shutdown) - EALs are unacceptable, guidance in NUREG-0818 should be considered.

RESOLUTION: The EAL in EP-IP-001, Rev. D, Attachment E, pages 20-21 is satisfactory.

RATIONALE: The only function needed to bring the plant to "hot shutdown" as defined in the Susquehanna Tech. Specs is reactivity control. NUREG-0818 guidance is indicative of an attempt to achieve "cold shutdown" which is covered in another Initiating Condition. The PP&L EAL is more responsive to the condition of concern, i.e.,

loss of the reactivity control and reactor coolant temperature greater than 200°F.

2. COMMENT: Initiating Condition 12 (loss of alarms and transient in progress) - The version of the EALs in NUREG-0654, Rev. 1 should be used.

RESOLUTION: PP&L agreed to revise EP-IP-001, Attachment E, pages 41-42 to include an EAL stating "or other indication that a transient has occurred or is in progress."

3. COMMENT: Initiating Condition 16 (other hazards) - An EAL for missile damage should be added. The requirement for the plant not to be in cold shutdown should be removed for toxic and flammable gases.

RESOLUTION: Revision D to EP-IP-001 (Attachment E, pages 22 and 23) incorporated the comments.

4. COMMENT: Initiating Condition 18 (control room evacuation) - Time specified to establish control from outside the control room cannot exceed 15 minutes.

RESOLUTION: Revision D to EP-IP-001, Attachment E, page 38 incorporated the comment.

5. COMMENT: Initiating Conditions 13a and b (radiological effluents) - Are not addressed. Dose rate triggers should be back calculated to a reading on the effluent monitor.

RESOLUTION: The EALs in EP-IP-001, Rev. D, Attachment E, pages 24-25 are satisfactory.

RATIONALE: PP&L dose calculation techniques are sophisticated and timely enough to preclude having to make "rule of thumb" type dose estimates based on effluent instrument readings. Triggers based on potential releases are included in other EALs (e.g., in containment high radiation on page 15) and don't need to be repeated here. Projections based on readings in the environs are included on page 25.

GENERAL EMERGENCY

1. COMMENT: Initiating Condition 2 (loss of 2 out of 3 fission product barriers with potential loss of the third) -

EALs are unacceptable. The suggestion in NUREG-0818 should be considered.

RESOLUTION: The EALs in EP-IP-001, Rev. D, Attachment E, pages 14-15 and pages 17-19 are satisfactory.

RATIONALE: Loss of fuel cladding and pressure boundary with potential loss of containment is explicitly covered on pages 14-15. Loss of pressure boundary and containment with potential loss of fuel cladding is explicitly covered on pages 17-19. Loss of fuel cladding and containment with potential loss of the pressure boundary is not considered to be a probable enough event to be treated explicitly in the EALs. The results of such a scenario are covered adequately by other EALs.

2. COMMENT: Initiating Condition 3 (loss of physical control) - PP&L incorrectly interpreted this Initiating Condition. The suggestions of NUREG-0818 should be considered.

RESOLUTION: Revision D to EP-IP-001 (Attachment E, page 30) incorporated the comment.

3. COMMENT: Initiating Condition 6 (example BWR sequences) - It appears there are EALs for initiating conditions 6b and 6c only. The suggestions of NUREG-0818 should be considered.

RESOLUTION: Revision D to EP-IP-001 (Attachment E, pages 20-21 and 39-40) incorporated the comment.

4. COMMENT: Initiating Condition 6a and 6d (example BWR sequences) - Are not addressed. (Note: This is the same comment as 3 above.)

RESOLUTION: Revision D to EP-IP-001, (Attachment E, pages 20-21 and 39-40) incorporated the comment.

5. COMMENT: Initiating Condition 7 (major internal or external events) - Is not addressed.

RESOLUTION: The specific wording of this initiating condition does not have to be included.

RATIONALE: Most of the events in this category are covered specifically in other EALs or under the umbrella of

the general EAL on page 49. The specific wording in NUREG-0654 adds no new information.

6. COMMENT: For containment monitor readings, what is the derivation and criteria used to calculate a value reflecting a core melt condition?

RESOLUTION: PP&L agreed to revise EP-IP-001, Attachment E, pages 14 and 15 to add a General Emergency EAL as follows: "Core melt as indicated by: containment post accident monitor indication on panel 1C601 greater than 2000 rem AND containment high pressure indication or annunciation on panel 1C601."; to change the present General Emergency EAL containment post accident monitor trigger from 100 rem to 400 rem; to change the present Site Emergency EAL post accident monitor trigger from 100 rem to 400 rem; and to add an Alert EAL as follows: "The containment post accident monitor indication on panel 1C601 greater than 200 rem."

RATIONALE: PP&L's preliminary study and industry survey indicated the above trigger levels for the containment post accident monitor are appropriate. PP&L will verify these numbers are indicative of Susquehanna specific conditions in a study to be completed post fuel load.

EH:mm