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U. S. Nuclear Regulatory Commission Attention: Document Control Desk Mail Stop O-P1-17 Washington, D.C 20555-0001

JUN 1 1 2012

## EMERGENCY PREPAREDNESS INFORMATION REQUESTED BY NRC LETTER, REQUEST FOR INFORMATION PURSUANT TO 10 CFR 50.54(f) REGARDING RECOMMENDATIONS 2.1, 2.3, AND 9.3, OF THE NEAR-TERM TASK FORCE REVIEW OF INSIGHTS FROM THE FUKUSHIMA DAI-ICHI ACCIDENT; DATED MARCH 12, 2012 PLA-6866

Docket Nos. 50-387 and 50-388

- References: 1) NRC Letter, Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident, dated March 12, 2012.
  - PLA-6852:PPL 60-day Response to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident, dated May 11, 2012.

On March 12, 2012, the NRC staff issued a letter entitled "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident," (Reference 1). Enclosure 5 of Reference 1 contains specific Requested Actions, Requested Information, and Required Responses associated with Recommendation 9.3 for Emergency Preparedness (EP) programs.

In accordance with 10 CFR 50.54, "Conditions of licenses," paragraph (f), addressees were requested to submit a written response to the information requests within 90 days. In accordance with Reference 1, Enclosure 5, on May 11, 2012, PPL Susquehanna, LLC (PPL) submitted an alternative course of action for performing the requested actions and provided the requested information (Reference 2). The alternative course of action included revised information due dates and the basis for those dates. As described in our alternative course of action, Attachment 1 to this letter provides PPL's response to the following information requests.

- Reference 2, Enclosure 1, Communications, Request #2
- Reference 2, Enclosure 1, Staffing, Request #3
- Reference 2, Enclosure 1, Staffing, Request #4
- Reference 2, Enclosure 1, Staffing, Request #5

Attachment 2 to this letter contains the list of commitments associated with this response.

If you have any questions regarding PPL's response, please contact Mr. John L. Tripoli, Manager, Nuclear Regulatory Affairs, at (570) 542-3100.

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

Executed on \_\_\_\_\_\_, 2012. 1 Achel for T.S. Rousch

**ULS**. Rausch Senior Vice President & Chief Nuclear Officer

Attachment 1: Responses to Communications and Staffing Information Requests Attachment 2: List of Commitments

 Copy: Mr. P. W. Finney, NRC Sr. Resident Inspector Mr. R. R. Janati, DEP/BRP
 Ms. C. J. Sanders, NRC Project Manager Region I Administrator, NRC

## **Responses to Communications and Staffing Requests for Information**

#### **Communications:**

<u>Request #2</u> - Describe any interim actions that have been taken or are planned to be taken to enhance existing communications systems power supplies until the communications assessment and the resulting actions are complete.

#### PPL Response:

A purchase order has been submitted for three portable diesel generators for the purpose of re-powering the Susquehanna Steam Electric Station's (SSES) radio system, charging satellite phone batteries, and charging portable radio batteries. Additional batteries are available for hand held communication devices to enable continued operation while depleted batteries are being recharged.

SSES has purchased twenty three (23) portable battery operated satellite telephones for use in the following areas: the Control Room, Technical Support Center, Operations Support Center, Emergency Operations Facility, Security Control Center and Alternate Security Control Center, the Pennsylvania State Police Barracks, and Columbia and Luzerne Counties, which are all located within 25 miles of the plant. Some satellite phones have remote portable antennas which will enable operation from their respective facilities, such as the Control Room and Technical Support Center.

SSES also has sound powered phones and is developing procedures to utilize this system for emergency plan communications during a station blackout.

SSES's radios have a "talk around" feature available, which permits direct transmissions from radio to radio, bypassing the radio repeater systems.

## **Staffing:**

# <u>Request #3</u> - Identify how the augmented staff would be notified given degraded communications capabilities.

#### PPL Response:

Current communication capabilities to notify the SSES Nuclear Emergency Response Organization (NERO) could be affected by large-scale disasters occurring within 25 miles of the site. The onsite satellite phones can be used to activate an emergency mass notification system, communicate with Luzerne and Columbia Counties to activate sirens, and communicate with the Pennsylvania Emergency Management Agency (PEMA) for activation of the Emergency Alert System to notify the NERO responders.

The station NERO response expectations will be revised to instruct NERO responders to report to their assigned emergency response facilities whenever they become aware of an area wide loss of grid.

The above expectations will be incorporated in procedures, communicated to NERO personnel and covered during annual NERO training.

## <u>Request #4</u> - Identify the methods of access (e.g., roadways, navigable bodies of water and dockage, airlift, etc.) to the site that are expected to be available after a widespread large scale natural event.

#### PPL Response:

Methods for access to the station after a widespread natural event could include: walking, use of cars, trucks, bicycles, and motorcycles; use of commercial and military helicopters; use of trains; and use of boats on the Susquehanna River, if necessary.

PPL has a long-established agreement with the Commonwealth of Pennsylvania under the mutual aid framework to obtain logistical support for SSES in the event of a large-scale natural disaster. Support services could include: transportation, clearing of access roads, and other assistance, as conditions warrant.

Routes of access to the site include:

1. Roadways: Access to the plant is via Route 11 North toward Wilkes-Barre and South toward Berwick. Several smaller township roads approach the site from the west. There are numerous detour routes available to bypass impediments or obstructions along these roadways after a widespread large scale natural event.

2. Air Transportation: Hazleton Municipal Airport and Wilkes-Barre/Scranton International Airport are nearby which could be used to shuttle personnel to the site using helicopters. Susquehanna has a designated landing zone at the site to accommodate helicopters.

3. Train Tracks: Direct railroad access exists to SSES from the South.

4. Navigable Body of Water: The Susquehanna River is adjacent to the site property.

## <u>Request #5</u> - Identify any interim actions that have been taken or are planned prior to the completion of the staffing assessment.

#### PPL Response:

In response to INPO Event Report (IER) L1 11-4, PPL performed a preliminary dual unit coping strategy assessment for an extended loss of all alternating current (AC) power and the study indicated that minimum on-shift staffing is adequate.

Regarding actions taken prior to the completion of the Phase 1 staffing assessment, PPL is currently assessing initial on-shift staffing for station blackout (SBO) conditions in response to the requirements of changes to 10 CFR Parts 50 and 52, effective December 23, 2011.

Procedures exist to ensure adequate staffing is available for round the clock coverage when significant natural events are forecast for the site area. SSES inventories include food, water, and sleeping supplies to support extended presence of emergency workers at the site.

Therefore, no interim changes to staffing are being made at this time.

## List of Commitments

The following table identifies those actions committed to by PPL Susquehanna, LLC. Any other statements in this letter are provided for information purposes and are not considered regulatory commitments.

Commitment Description	Due Date	AR No.
Purchase, install and maintain satellite phone communication equipment according to the attached list. Determine proper number of spare batteries required for each phone as well as bank battery chargers and individual chargers and purchase accordingly.	Closed	1496629
Purchase, install and maintain portable generators (recommend 3) for establishing 2 or 3 temporary portable battery charging stations and for re- energizing the installed plant radio system.	12/31/2012	1496632
<ul> <li>Perform more extensive review to ensure at least 24 hour usage of the following systems:</li> <li>1. Plant radio battery back up</li> <li>2. Plant phone system battery back up</li> <li>3. Public address system (Gai Tronics)</li> <li>4. NERO Pager Transmitter/Repeater located on site</li> <li>If battery back up power is less than 24 hours, perform necessary modifications to install appropriate batteries and battery charger/conditioners and the ability to re-energize with portable generators.</li> </ul>	12/31/2012	1496636
Review and incorporate the use of sound powered phones into emergency procedures for communication during a station blackout.	12/31/2012	1496639
Include satellite phone usage instructions in the Emergency Phone Directory maintained by Emergency Planning.	12/31/2012	1496644

Commitment Description	Due Date	AR No.
<ul> <li>Develop procedures associated with establishing alternate means of communication with regard to</li> <li>INPO IER 11-4 Recommendation 4. Please consider: <ol> <li>Satellite phone communication</li> <li>Establishment of temporary battery charging stations for spare batteries and other electrical devices, and</li> <li>Re-energizing the plant radio system with a portable generator.</li> <li>Implementation/set-up and operation of the equipment</li> <li>Operation beyond 24 hours with no AC power.</li> <li>Utilizing runners for some communications</li> </ol> </li> </ul>	12/31/2012	1496642
Ensure the following actions are incorporated in procedures, communicated to NERO personnel and covered during annual NERO training. These commitments were included in the PPL response to RFI 9.3 90 day response to the NRC. (Reference AR 1562249) Request #3 - Identify how the augmented staff would be notified given degraded communications	12/31/2012	1581955
capabilities. Response:		
Current communication capabilities to notify the Nuclear Emergency Response Organization (NERO) could be affected by large-scale disasters occurring within 25 miles of a site.		
The onsite satellite phones can be used to activate an emergency mass notification system, communicate with Luzerne and Columbia to activate sirens, and communicate with PEMA for activation of the Emergency Alert System to notify the NERO responders.		

Commitment Description	Due Date	AR No.
The station NERO response expectations will be revised to instruct NERO responders to report to their assigned emergency response facilities whenever they become aware of an area wide loss of grid.		
The above expectations will be incorporated in procedures, communicated to NERO personnel and covered during annual NERO training.		