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U. S. Nuclear Regulatory Commission Attention: Document Control Desk Washington, DC 20555-0001

SUSQUEHANNA STEAM ELECTRIC STATION RESPONSE TO FOLLOW-UP LETTER ON TECHNICAL ISSUES FOR RESOLUTION REGARDING LICENSEES COMMUNICATION SUBMITTALS PLA-6978

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.
 - 2. PLA-6852, "60-Day Response to 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," dated May 11, 2012.
 - 3. PLA-6866, "Emergency Preparedness Information Requested by NRC Letter," dated June 11, 2012.
 - 4. PLA-6927, "Requested Communications Assessment Results and Implementation Schedule per References 1 and 2," dated October 31, 2012.
 - 5. NRC Letter, "Follow-Up Letter on Technical Issues for Resolution Regarding Licensee Communication Submittals associated with Near-Term Task Force Recommendation 9.3 (TAC NO. ME7951)," dated January 23, 2013.

On March 12, 2012, the Nuclear Regulatory Commission (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 and Requested Information 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 request within 90 days from the date of letter.

Reference 1 also states that if an addressee cannot meet the requested response date, the addressee must provide a response within 60 days of the date of the letter and describe

the alternative course of action that it proposes to take, including the basis of the acceptability of the proposed alternative course of action and estimated completion date. After a careful review of the requested actions and information, PPL Susquehanna, LLC (PPL) opted to take an alternative course of action as described in Enclosure 1 of Reference 2. The basis for PPL's alternative course of action was documented in Enclosure 2 of Reference 2. This alternative course of action was based on the industry standard guidance developed with the Nuclear Energy Institute (NEI).

Reference 4 provided PPL's Communications Assessment Results and Implementation Schedule for planned changes. Enclosure 1 to Reference 3 contains the results of the Communications Assessment in the format presented in NEI 12-01, "Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities." Enclosure 2 of Reference 4 contains a list of regulatory commitments regarding the changes PPL planned to make as a result of the Communications Assessment.

In Reference 5, the NRC identified eight (8) eight generic technical issues needing resolution to determine the licensee's communications capability regarding a multi-unit station blackout event. The NRC requested a response be provided within 30 days from the date of the letter.

The purpose of this letter and associated Enclosure 1 is to provide PPL's response to Reference 5. PPL's response in Enclosure 1 is in a tabular format with three columns. The table presents the NRC's Generic Technical Issues in the left hand column. Information from PPL's Communications Assessment submittal (Reference 4) is presented in the center column. The right hand column provides additional information to fully respond to the NRC's Generic Technical Issues and augments PPL's original response (Reference 4).

PPL requests that Enclosure 1 to this letter be withheld from public disclosure. The information represents proprietary, confidential, and Security sensitive material as defined by 10 CFR 2.390.

Enclosure 2 to this letter contains a list of new regulatory commitments.

If you have any questions regarding the information contained in this letter, 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 _

T.S. Rauseh

Senior Vice President & Chief Nuclear Officer

- Enclosures: 1. PPL's Response to the NRC's 8 Generic Technical Issues for RFI 9.3 Communications Assessment – Withhold from Public Disclosure in Accordance with 10 CFR 2.390
 - 2. List of Regulatory Commitments
 - 3. Affidavit

Copy: Mr. P. W. Finney, NRC Sr. Resident Inspector

Mr. J. A. Whited, NRC Project Manager

Mr. L. J. Winker, PA DEP/BRP Region I Administrator, NRC

Enclosure 2 to PLA-6978 List of Regulatory Commitments

List of Regulatory Commitments

| Item | Description | Due Date | Tracking # |
|------|---------------------------------------|------------|------------|
| 1 | SSES will revise EP-RM-008, | 06/28/2013 | 1671371 |
| | "Emergency Telephone Directory" to | | |
| | include satellite phone usage | | |
| | instructions. | | |
| 2 | NDAP-QA-0777, "PPL Susquehanna | 05/24/2013 | 1499071 |
| | Emergency Preparedness Program" | | |
| | will be revised to include the "self- | | |
| | activation" expectation and guidance | | |
| | that SSES' NERO personnel have | | |
| | already been trained on. | | |
| | | | |

Enclosure 3 to PLA-6978 Affidavit

AFFIDAVIT OF TIMOTHY S. RAUSCH

- I, Timothy S. Rausch, Senior Vice President and Chief Nuclear Officer, PPL Susquehanna, LLC, do hereby affirm and state:
- 1. I am authorized to execute this affidavit on behalf of PPL Susquehanna, LLC (hereinafter referred to as "PPL").
- 2. PPL requests that the document enclosed hereto ("Enclosure 1") be withheld from public disclosure under the provisions of 10 C.F.R. 2.390(a)(4) and 2.390(d)(1).
- 3. The PPL Document contains confidential commercial information, the disclosure of which would adversely affect PPL.
- 4. This information has been held in confidence by PPL. To the extent that PPL has shared this information with others, it has done so on a confidential basis.
- 5. PPL customarily keeps such information in confidence and there is a rational basis for holding such information in confidence. The information is not available from public sources and could not be gathered readily from other publicly available information.
- 6. Public disclosure of this information would cause substantial harm to the competitive position of PPL, because such information has significant commercial value to PPL.
- 7. PPL requests that the information identified in paragraph (2) above be classified as proprietary commercial information because it details results of an assessment performed to assess PPL's communications capabilities during an extended loss of AC power. The results and the conditions under which it was collected constitutes a major PPL asset.
- 8. This information is of a type that is held in confidence by PPL, and there is a rational basis for doing so because the information contains sensitive commercial information concerning the physical protection of PPL's facility.

PPL SUSQUEHANNA, LLC

Γimothy S. Rausch

Commonwealth of Pennsylvania
County of Lehigh

Subscribed and sworn before me, a Notary Public in and for the Commonwealth of Pennsylvania This 22 day of February , 2013

NOTARIAL SEAL
JACQUELINE M. JACOB
Notary Public
ALLENTOWN CITY, LEHIGH COUNTY
My Commission Expires Mar 20, 2016