



PECO ENERGY

10CFR50.80

PECO Energy Company
Nuclear Group Headquarters
965 Chesterbrook Boulevard
Wayne, PA 19087-5691

March 23, 2000

Docket Nos. 50-352
50-353
50-171
50-277
50-278
50-272
50-311

License Nos. NFP-39
NFP-85
DPR-12
DPR-44
DPR-56
DPR-70
DPR-75

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

Subject: Limerick Generating Station, Units 1 & 2
Peach Bottom Atomic Power Station, Units 1, 2 & 3
Salem Generating Station, Units 1 & 2
Response to Request for Additional Information Regarding Application for
License Transfers and Conforming Administrative License
Amendments

- References:
- (1) PECO Energy Company letter,
"Application for License Transfers and Conforming Administrative
License Amendments," dated December 20, 1999
 - (2) NRC letter, "Request for Additional Information - Limerick, Peach Bottom
and Salem Stations," dated March 9, 2000

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Dear Sir/Madam:

By the Reference 2 letter, the NRC requested additional information involving our application for license transfers submitted by the Reference 1 letter. This request for additional information was discussed during a February 24, 2000, telephone conference call between representatives of Commonwealth Edison Company, PECO Energy Company, and the NRC. As a part of that discussion, we agreed to submit the requested information by March 17, 2000. During a subsequent telephone call on March 16, 2000, we requested and the NRC agreed to an extension of the submittal date to March 24, 2000.

Enclosure 1, "Response to Request for Additional Information," provides responses to the requests forwarded in the Reference 2 letter. Enclosure 2, "Key Executives Job Descriptions," contains the information for the individual positions requested in Request 2 of the Reference 2 letter.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in black ink, appearing to read "J. A. Hutton", with a long horizontal line extending to the right.

J. A. Hutton
Director - Licensing

Attachment

cc: H. J. Miller, Administrator, Region I, USNRC
A. L. Burritt, USNRC Senior Resident Inspector, LGS
A. C. McMurray, USNRC Senior Resident Inspector, PBAPS
S. Morris, USNRC Senior Resident Inspector, SGS

Enclosure 1

Response to Request for Additional Information

Request 1

Please provide more information on "GENCO-NG." What is the relationship of GENCO-NG to the other units in Exelon and GENCO?

Response 1

Exelon Corporation (Exelon), a new holding company, is to be formed in connection with the proposed merger of Unicom Corporation, the parent company of Commonwealth Edison (ComEd) Company, and PECO Energy Company (PECO). GENCO, a new generating company, is to be formed as one of the subsidiaries of Exelon. Other subsidiaries of Exelon will include ComEd and PECO. Several business units will be within GENCO, one of which will be the Nuclear Group (NG), in addition to other electrical generation organizations (i.e., fossil-fueled and PECO's interest in hydroelectric), and a wholesale power marketing and trading organization. GENCO will also acquire PECO's ownership interest in AmerGen Energy Company (AmerGen), LLC. GENCO will sell electricity to electric utility affiliates (i.e., ComEd and PECO) and will market electricity pursuant to rate tariffs approved by the Federal Energy Regulatory Commission.

GENCO will own and operate the nuclear units currently owned and operated by ComEd and PECO. GENCO will also acquire PECO's existing 50% ownership interest in each of the nuclear units currently owned by AmerGen. The GENCO-NG, a business unit of GENCO, will be the entity responsible for operation of the nuclear units within the GENCO organization. The NG will not be a separate corporation, but will be a business unit within GENCO.

Request 2

Provide resumes or job descriptions for the Corporate Nuclear Support Vice President, the Chief Operating Officer, and the Regional Operating Group Vice Presidents of GENCO.

Response 2

Job descriptions for the positions of Chief Operating Officer, Regional Operating Group Vice President, Nuclear Services Vice President, and Nuclear Technical Support Vice President are provided in Enclosure 2, "Key Executives Job Descriptions." These positions will be filled by individuals who possess senior nuclear management experience.

The responsibilities of the Corporate Nuclear Support Vice President position have been assigned to two positions: the Nuclear Services Vice President and the Nuclear Technical Support Vice President. The Nuclear Services Vice President will be responsible for areas such as nuclear fuels, outage services, project management, security, supply, information systems, decommissioning projects, and laboratory services. The Nuclear Technical Support Vice President will be responsible for areas such as engineering, generation support (e.g., chemistry, radiation protection, emergency preparedness), training, regulatory services, and maintenance/work control. Both of these Vice Presidents will be accountable for defining standard programs and processes, delivering effective services and support, providing technical oversight of program implementation, and supporting the deployment and sharing of best practices throughout the organization.

Request 3

With regard to the technical support organization:

- (a) How does each plant Vice President obtain the necessary technical support from the Corporate Nuclear Support Vice President?
- (b) How will multiple corporate support requests be prioritized to ensure that sufficient technical resources will continue to be adequate to support sufficient operation of each nuclear plant?

Response 3

The resources required to support operation of each plant will be located onsite and report to site leadership. Supplemental support for the sites will be available from the Nuclear Services and Technical Support organizations. Required support will be arranged directly with the leaders of these organizations.

Personnel from the Nuclear Services and Technical Support organizations will be located at the NG headquarters and in regional offices in order to ensure timeliness of their support.

Ample resources will exist within these organizations to provide supplemental and expert support for all operational priorities. Assistance will also be obtained from our key suppliers (i.e., nuclear steam supply system vendors, Engineers of Choice, and maintenance and modification contractors) and other industry organizations (i.e., Electric Power Research Institute, Nuclear Energy Institute, and Institute of Nuclear Power Operations) as appropriate.

This does not represent a notable change from the manner in which assistance is rendered by the support and services functions in the existing companies.

Request 4

With regard to the operating organization, "Technical Qualifications of GENCO," Section D, "Technical Support," states "the personnel at each nuclear station, including senior managers, will be essentially unchanged as a result of the merger." On the basis of the above information and the information contained in the remainder of the submittal, the definition of "essentially unchanged" is interpreted as:

"The current onsite organization structure and the assignment of primary responsibility to the plant staff of those onsite organizations will be transferred without change."

Verify this is the correct interpretation or submit the intended meaning for "essentially unchanged."

Response 4

It is anticipated that, at the time the licenses are transferred, the onsite organizational structures and the assignments of primary responsibility to plant staff will not be changed. Modifications to organizational structures and responsibilities may however be made from time to time to improve effectiveness.

Enclosure 2

Key Executives Job Descriptions

JOB DESCRIPTION

Position: Chief Operating Officer

Reports To (Title): GENCO Nuclear Group President and Chief Nuclear Officer

Primary Purpose of Job

Accountable for the safe and efficient operation of the GENCO nuclear fleet. Reports directly to GENCO Nuclear Group President and Chief Nuclear Officer.

Major Accountabilities

1. Has day-to-day responsibility and accountability for the safe and efficient operation of the nuclear fleet.
2. Responsible for planning, organizing, directing and controlling the operations, maintenance and improvement of GENCO nuclear power production facilities.
3. Prescribes operational programs and standards to be implemented throughout the GENCO nuclear fleet, and provides management oversight of execution of those programs.
4. As a member of the GENCO nuclear executive team, participates in the formulation of GENCO nuclear strategy and policy.
5. Manages and allocates resources required for the operations of the GENCO nuclear fleet.
6. Oversees executives accountable for managing multi-plant Regional Operating Groups.
7. Accountable for the retention and development of key executive/management talent required to operate GENCO nuclear facilities.
8. Has authority to make plant organizational changes and adjust plant staffing.
9. Involved in the review and management of nuclear-related merger and acquisition activities.

JOB DESCRIPTION

Position: Regional Operating Group Vice President

Reports To (Title): GENCO Chief Operating Officer

Primary Purpose of Job

Accountable for the safe and efficient operation of the GENCO nuclear facilities within Regional Operating Group (ROG). Reports directly to GENCO Chief Operating Officer.

Major Accountabilities

1. Has overall responsibility and accountability for the safe and efficient operation of the nuclear plants within assigned ROG.
2. Responsible for planning, organizing, and directing the operations, maintenance and improvement of GENCO nuclear power production facilities within ROG.
3. Manages and allocates resources required for the operations of the nuclear facilities within ROG.
4. Works closely with other GENCO nuclear executives to ensure that the support and service required are provided efficiently and on a timely and responsive basis.
5. Defines priorities for work, and takes other necessary actions to reinforce line accountability for plant performance in accordance with performance standards.
6. Assures consistent application of corporate policy, directives, standards, and best practices throughout ROG.
7. Oversees executives accountable for managing specific nuclear facilities within ROG.
8. Accountable for the retention and development of key executive/management talent required to operate GENCO nuclear facilities within ROG.
9. As a member of the GENCO nuclear executive team, participates in the formulation of GENCO nuclear strategy and policy.

JOB DESCRIPTION

Position: Nuclear Services Vice President

Reports To (Title): GENCO Nuclear Group President and Chief Nuclear Officer

Primary Purpose of Job

Ensures that effective services are provided to GENCO nuclear facilities. Reports directly to GENCO Nuclear Group President and Chief Nuclear Officer.

Major Accountabilities

1. Develops and directs offsite Nuclear Services functions and programs including Information Systems, Fuels, Outage Services, Project Management, Decommissioning Projects, Laboratory Services, Security, and Supply Management. The Nuclear Services organization serves as the Nuclear Group technical authority in all assigned functional areas.
2. Directs others accountable for supporting the operating organizations with respect to Nuclear Services functional areas.
3. Defines, provides technical oversight, and supports the implementation of standards, programs, processes and best practices within assigned functional areas throughout GENCO Nuclear Group.
4. Works closely with other GENCO nuclear executives to ensure that the support and service required from the assigned functions are provided competently, in accordance with prescribed standards and programs, efficiently and on a timely and responsive basis.
5. Ensures that organizational actions are taken to reinforce line accountability for plant performance in accordance with performance standards.
6. Accountable for the retention and development of key executive/management talent required to support GENCO nuclear fleet and for the availability of personnel for rotation into the operating plant organizations.
7. Has authority to make Nuclear Services organizational changes and change support staffing as required.
8. Defines the qualifications required of personnel in assigned functions and ensures the availability of personnel. Solicits feedback from the operating organizations on the performance of personnel.
9. As a member of the GENCO nuclear executive team, participates in the formulation of GENCO nuclear strategy and policy.

JOB DESCRIPTION

Position: Nuclear Technical Support Vice President

Reports To (Title): GENCO Nuclear Group President and Chief Nuclear Officer

Primary Purpose of Job

Ensures that effective technical support is provided to GENCO nuclear facilities. Reports directly to GENCO Nuclear Group President and Chief Nuclear Officer.

Major Accountabilities

1. Develops and directs offsite Nuclear Technical Support functions and programs including Engineering, Generation Support, Maintenance/Work Control, Training, and Regulatory Services. The Nuclear Technical Support organization serves as the Nuclear Group technical authority in all assigned functional areas.
2. Directs others accountable for supporting the operating organizations with respect to Nuclear Technical Support functional areas.
3. Defines, provides technical oversight, and supports the implementation of standards, programs, processes and best practices within assigned functional areas throughout GENCO Nuclear Group.
4. Works closely with other GENCO nuclear executives to ensure that the support and service required from the assigned functions are provided competently, in accordance with prescribed standards and programs, efficiently and on a timely and responsive basis.
5. Ensures that organizational actions are taken to reinforce line accountability for plant performance in accordance with performance standards.
6. Accountable for the retention and development of key executive/management talent required to support GENCO nuclear fleet and for the availability of personnel for rotation into the operating plant organizations.
7. Has authority to make Nuclear Technical Support organizational changes and change support staffing as required.
8. Defines the qualifications required of personnel in assigned functions and ensures the availability of personnel. Solicits feedback from the operating organizations on the performance of personnel.
9. As a member of the GENCO nuclear executive team, participates in the formulation of GENCO nuclear strategy and policy.