

December 26, 1991

Docket Nos. 50-277/278
and 50-352/353

Mr. George J. Beck
Manager-Licensing, MC 5-2A-5
Philadelphia Electric Company
Nuclear Group Headquarters
Correspondence Control Desk
P.O. Box No. 195
Wayne, Pennsylvania 19087-0195

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Dear Mr. Beck:

SUBJECT: PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3, AND LIMERICK GENERATING STATION, UNITS 1 AND 2, EXEMPTION FOR REQUALIFICATION TRAINING FOR SENIOR REACTOR OPERATORS LIMITED TO FUEL HANDLING (TAC NOS. M81918, M81919, M81920 and M81921)

In response to your letter of October 18, 1991, the Commission has issued the enclosed Exemption from the requirements of 10 CFR 55.59(a)(2) and 10 CFR 55.59(c)(4)(i) for eight Senior Reactor Operators limited to fuel handling (LSROs). The exemption grants a one-time scheduler exemption to the eight LSROs, who are licensed for both Peach Bottom Atomic Station, Units 2 and 3, and the Limerick Generating Station, Units 1 and 2, to permit them to take their first annual requalification operating test in January 1992 instead of the end of 1991. The docket numbers for the eight LSROs are: 55-61452, 55-61453, 55-61454, 55-61455, 55-61456, 55-61457, 55-61459 and 55-61461.

The exemption has been forwarded to the office of the Federal Register for publication.

Sincerely,

Original signed by
Richard J. Clark

Richard J. Clark, Project Manager
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosures:

1. Exemption
2. Safety Evaluation

cc w/enclosures:

See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

December 26, 1991

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and 50-352/353

Mr. George J. Beck
Manager-Licensing, MC 5-2A-5
Philadelphia Electric Company
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The exemption has been forwarded to the office of the Federal Register for publication.

Sincerely,

A handwritten signature in cursive script, reading "Richard J. Clark".

Richard J. Clark, Project Manager
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosures:

1. Exemption
2. Safety Evaluation

cc w/enclosures:
See next page

Mr. George J. Beck
Philadelphia Electric Company

Peach Bottom Atomic Power Station,
Units 2 and 3 and Limerick
Generating Station, Units 1 and 2

cc:

J. W. Durham, Sr., Esquire
Sr. V.P. & General Counsel
Philadelphia Electric Company
2301 Market Street, S26-1
Philadelphia, Pennsylvania 19101

Single Point of Contact
P. O. Box 11880
Harrisburg, Pennsylvania 17108-1880

Philadelphia Electric Company
ATTN: Mr. D. B. Miller, Vice President
Peach Bottom Atomic Power Station
Route 1, Box 208
Delta, Pennsylvania 17314

Mr. Thomas M. Gerusky, Director
Bureau of Radiation Protection
Pennsylvania Department of
Environmental Resources
P. O. Box 2063
Harrisburg, Pennsylvania 17120

Philadelphia Electric Company
ATTN: Regulatory Engineer, A1-2S
Peach Bottom Atomic Power Station
Route 1, Box 208
Delta, Pennsylvania 17314

Board of Supervisors
Peach Bottom Township
R. D. #1
Delta, Pennsylvania 17314

Resident Inspector
U.S. Nuclear Regulatory Commission
Peach Bottom Atomic Power Station
P.O. Box 399
Delta, Pennsylvania 17314

Public Service Commission of Maryland
Engineering Division
ATTN: Chief Engineer
231 E. Baltimore Street
Baltimore, MD 21202-3486

Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, Pennsylvania 19406

Mr. Richard McLean
Power Plant and Environmental
Review Division
Department of Natural Resources
B-3, Tawes State Office Building
Annapolis, Maryland 21401

Mr. Roland Fletcher
Department of Environment
201 West Preston Street
Baltimore, Maryland 21201

Mr. Rod Krich 52A-5
Philadelphia Electric Company
955 Chesterbrook Boulevard
Wayne, Pennsylvania 19087-5691

Carl D. Schaefer
External Operations - Nuclear
Delmarva Power & Light Company
P.O. Box 231
Wilmington, DE 19899

Mr. John Doering
Plant Manager
Limerick Generating Station
P.O. Box A
Sanatoga, Pennsylvania 19464

Mr. Graham M. Leitch, Vice President
Limerick Generating Station
P.O. Box A
Sanatoga, Pennsylvania 19464

Mr. Thomas Kenny
Senior Resident Inspector
U.S. Nuclear Regulatory Commission
P.O. Box 596
Pottstown, Pennsylvania 19464

Mr. George J. Beck
Philadelphia Electric Company

Peach Bottom Atomic Power Station,
Units 2 and 3 and Limerick
Generating Station, Units 1 and 2

Mr. George A. Hunger
Project Manager
Limerick Generating Station
P.O. Box A
Sanatoga, Pennsylvania 19464

Mr. Larry Hopkins
Superintendent-Operations
Limerick Generating Station
P.O. Box A
Sanatoga, Pennsylvania 19464

Mr. Garret Edwards
Superintendent-Technical
Limerick Generating Station
P.O. Box A
Sanatoga, Pennsylvania 19464

Mr. Gil Madsen
Regulatory Engineer
Limerick Generating Station
P.O. Box A
Sanatoga, Pennsylvania 19464

Library
U.S. Nuclear Regulatory Commission
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King of Prussia, Pennsylvania 19406
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)	
PHILADELPHIA ELECTRIC COMPANY)	
PUBLIC SERVICE ELECTRIC AND GAS COMPANY)	
DELMARVA POWER AND LIGHT COMPANY)	Docket Nos. 50-277
ATLANTIC CITY ELECTRIC COMPANY)	50-278
)	50-352
(Peach Bottom Atomic Power Station,)	50-353
Units 2 and 3))	
(Limerick Generating Station,)	
Units 1 and 2))	

EXEMPTION

I.

The Philadelphia Electric Company, et. al. (PECo, the licensee), is the holder of Operating License Nos. DPR-44, DPR-56, NPF-39 and NPF-85 which authorizes operation of the Peach Bottom Atomic Power Station, Units 2 and 3 (PBAPS), and the Limerick Generating Station, Units 1 and 2 (LGS), at steady state reactor core power levels not in excess of 3293 megawatts thermal. These licenses provide, among other things, that the licensee is subject to the rules, regulations, and orders of the Commission now or hereafter in effect.

The Limerick facility consists of two boiling water reactors located at the licensee's site in Montgomery and Chester Counties, Pennsylvania. The Peach Bottom facility also consists of two boiling water reactors located at the licensee's site in York County, Pennsylvania.

II.

This exemption grants a one-time schedular exemption to eight (8) Senior Reactor Operators limited to fuel handling (LSROs) to permit them to take

their first annual requalification operating test during January 1992 instead of the end of 1991. The docket numbers for the eight LSR0s are: 55-61452, 55-61453, 55-61454, 55-61455, 55-61456, 55-61457, 55-61459 and 55-61461.

III.

By letter dated October 18, 1991, the licensee requested an exemption, in accordance with 10 CFR 55.11 from the requirements of 10 CFR 55.59(a)(2) and 10 CFR 55.59(c)(4)(i) related to annual requalification operating tests for LSR0s. Pursuant to 10 CFR 55.53(h) a licensee, as a condition of the license, shall complete a requalification program as described by 10 CFR 55.59. In 10 CFR 55.59(c)(4)(i), the requalification program must include annual operating tests, and 10 CFR 55.59(a)(2) stipulates that each licensee shall pass an annual operating test.

NRC Generic Letter (GL) No. 89-03, "Operator Licensing National Examination Schedule," issued March 24, 1989, specified two examination months for each facility during which operator licensing examinations would be conducted each year. The purpose of the national examination schedule is to provide a consistent time period for conducting the examinations at each facility so that the facility can establish a standard schedule for conducting the required licensed operator training, and so that the NRC can schedule the resources required for conducting the examinations. The national examination schedule months for LGS, Units 1 and 2, are January and July. The scheduled months for PBAPS are February and August. PECo is requesting, on behalf of the licensed LSR0s, a one-time schedular exemption from the requirements of 10 CFR 55.59(a)(2) with regard to each individual licensed LSR0 to conduct the first annual requalification operating test for the multi-site licensed LSR0s

in January 1992 in conformance with the national examination schedule for LGS instead of the end of 1991. By letter dated October 18, 1991, from R. J. Conte, Region I, to D. M. Smith, PECO, the NRC confirmed that arrangements have been made for administration of fuel handling licensing examinations at LGS, for both Limerick and Peach Bottom, during the week of January 13, 1992.

The two units at PBAPS and the two units at LGS are all BWR-4 reactors. PECO has a nuclear maintenance group responsible for core alterations, reactor refueling and in-vessel maintenance activities (e.g., control rod drive replacement) during refueling outages at both LGS and PBAPS. The Technical Specifications (TS) require that all core alterations shall be observed and directly supervised by either a licensed Senior Operator (SRO) or licensed LSRO. To meet this requirement, PECO has implemented a new LSRO program that established LSROs with a dual license applicable at both PBAPS, Units 2 and 3 and LGS, Units 1 and 2. The objective of the LSRO program is to maintain a small group of licensed personnel to supervise core alterations (reactor refueling and in-vessel maintenance activities) during refueling outages at each of the four nuclear units, LGS and PBAPS. There are currently eight (8) LSROs who hold a dual SRO license limited to fuel handling involved in the current Peach Bottom Unit 3 refueling outage.

The LSROs were initially licensed at LGS, Units 1 and 2, on September 10, 1990. The licenses were amended on January 9, 1991, to include PBAPS, Units 2 and 3, based on successful completion of training on the differences between LGS and PBAPS, and written and operating examinations on these differences. According to 10 CFR 55.59(a)(2) and 10 CFR 55.59(c)(4)(i), the LSROs licensed in September 1990 have to pass an annual operating test (i.e., by the end of

1991) to maintain their licenses. The licensees are requesting a one-time schedular exemption in order to bring the requalification exams in accordance with the NRC's National Examination Schedule.

Prior to shutdown of Peach Bottom Unit 3 on September 14, 1991, for the current refueling outage, there was an indication of several fuel pin failures as evidenced by slightly elevated offgas activity. A sample inspection of some fuel bundles revealed the possibility of widespread debris (metal shavings, etc) in the core. PECO decided to remove, inspect, clean, as necessary and reinsert the 508 fuel assemblies that would otherwise have remained in the reactor. The additional, unanticipated fuel handling and other core alterations are going to tie-up the LSR0s until the end of December 1991.

IV.

The Commission has determined that pursuant to 10 CFR 55.11, the exemption requested by PECO's letter of October 18, 1991, is authorized by law and will not endanger life or property, and is otherwise in the public interest. Accordingly, the Commission hereby grants the following exemption:

Philadelphia Electric Company and the eight Senior Reactor Operators limited to fuel handling (LSROs) identified in the letter of October 18, 1991, are granted a one-time schedular exemption from the requirements of 10 CFR 55.59(a)(2) and 10 CFR 55.59(c)(4)(i) to permit the LSR0s to take the annual requalification operating test in January 1992 instead of in 1991.

Pursuant to 10 CFR 51.32, the Commission has determined that the granting of this exemption will have no significant effect on the quality of the human environment (56 FR 65514).

This exemption is effective upon issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

A handwritten signature in black ink, appearing to read "Steven A. Varga". The signature is written in a cursive style with a large, prominent loop at the end.

Steven A. Varga, Director
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Dated at Rockville, Maryland,
this 26th day of December 1991.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AN EXEMPTION FROM 10 CFR 55.59(a)(2)

AND 10 CFR 55.59(c)(4)(i) REQUIREMENTS

PHILADELPHIA ELECTRIC COMPANY

PUBLIC SERVICE ELECTRIC AND GAS COMPANY

DELMARVA POWER AND LIGHT COMPANY

ATLANTIC CITY ELECTRIC COMPANY

LIMERICK GENERATING STATION, UNITS 1 AND 2

DOCKET NOS. 50-352 AND 50-353

PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3

DOCKET NOS. 50-277 AND 50-278

1.0 INTRODUCTION

The Philadelphia Electric Company, et. al. (PECo, the licensee) has established a program by which a dedicated group of individuals supervise core alterations and associated fuel handling activities at both the Limerick Generating Station (LGS) and the Peach Bottom Atomic Power Station (PBAPS). The U.S. Nuclear Regulatory Commission (NRC) has licensed these individuals as limited senior reactor operators (LSROs) for fuel handling at both sites, enabling them to supervise and conduct licensed activities associated with core alterations during refueling outages. PECo's refueling outage schedule for the four units under its purview is such that there are two alternate site units in a refueling outage each year, one in the spring and one in the fall. These LSROs will have the opportunity to execute their licensed duties during each of these outages. The LSRO requalification training program at PECo consists of at least 40 hours of plant specific training prior to each refueling outage at LGS and PBAPS, with a minimum of two training cycles per year (i.e., one cycle at each site per year). Each training cycle includes in-plant job performance measures (JPMs) which, for LSROs are designed to demonstrate their knowledge of refueling equipment and systems, their ability to execute normal, abnormal, and emergency procedures associated with fuel handling, and their ability to supervise the operation of equipment and systems to safely handle irradiated fuel.

Each participant is required to successfully pass an examination at the end of each training cycle which includes JPM evaluations. If an LSRO fails this examination, the individual will be removed from licensed duties until remediated and successfully re-examined. Therefore, the LSRO's operating skills and abilities are determined at the end of each requalification training cycle through the JPM evaluations. The LSROs have successfully completed requalification training and passed the associated examinations in March 1991 for LGS and in September 1991 for PBAPS. Additionally, the LSROs' licenses were amended to include PBAPS, Units 2 and 3, in January 1991 based on successfully passing the initial operating test at PBAPS in December 1990. In addition to the two operating tests per year, 10 CFR 55.59(a)(2) requires an annual comprehensive written examination to determine whether retraining is needed to upgrade the LSROs' knowledge and ability in the areas described above.

By letter dated October 18, 1991, the licensee requested an exemption, in accordance with 10 CFR 55.11 from the requirements of 10 CFR 55.59(a)(2) and 10 CFR 55.59(c)(4)(i) related to annual requalification operating tests for LSROs. Pursuant to 10 CFR 55.53(h) a licensee, as a condition of the license, shall complete a requalification program as described by 10 CFR 55.59. In 10 CFR 55.59(c)(4)(i), the requalification program must include annual operating tests, and 10 CFR 55.59(a)(2) stipulates that each licensee shall pass an annual operating test, as previously noted. Specifically, PECO requested a one-time schedular exemption for eight (8) LSROs to authorize the LSROs to take the annual requalification operating test in January 1992 instead of the end of 1991.

2.0 EVALUATION

NRC Generic Letter (GL) No. 89.03, "Operator Licensing National Examination Schedule," issued March 24, 1989, specified two examination months for each facility during which operator licensing examinations would be conducted each year. The purpose of the national examination schedule is to provide a consistent time period for conducting the examinations at each facility so that the facility can establish a standard schedule for conducting the required licensed operator training, and so that the NRC can schedule the resources required for conducting the examinations. The national examination schedule months for LGS, Units 1 and 2, are January and July. The scheduled months for PBAPS are February and August. PECO is requesting, on behalf of the licensed LSROs, a one-time schedular exemption from the requirements of 10 CFR 55.59(a)(2) with regard to each individual licensed LSRO to conduct the first annual requalification operating test for the multi-site licensed LSROs in January 1992 in conformance with the national examination schedule for LGS instead of the end of 1991.

The licensee's request for a one month extension of the examination date would allow alignment with the national examination schedule. The extension of the date would not alter the program. The licensee is required to maintain a requalification program on a 24 month interval. During this interval the licensee must conduct 2 annual operating tests and administer a comprehensive

written examination. The LSRO's received NRC licensing examinations for Limerick, Units 1 and 2, in September 1990, and in December 1990 they were examined at Peach Bottom, Units 2 and 3. The amended licenses were issued in February 1991. An exemption to extend the date of the operating test would lie within 12 months of the amendments. The licensee has also conducted two training programs for the LSROs, in 1991, which included abbreviated operating tests covering subjects on which the personnel had received training during the year.

3.0 CONCLUSION

1. The licensee has conducted job performance measure evaluations of the LSROs twice over the 1991 calendar year. The extension is only for one month and lies within 12 months of the license amendments. The personnel received two licensing examinations in the later part of 1990. Considering these factors, granting an exemption to allow a shift in examination dates from December 1991 to January 1992 is acceptable.
2. The request for exemption meets the criteria in 10 CFR 55.11 in that life or property will not be endangered and that the exemption is otherwise in the public interest.

Principal Contributors: R. Clark
W. Dean
G. Johnston

Date: December 26, 1991