



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

December 10, 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

Dear Mr. Beck:

SUBJECT: PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3, AND LIMERICK GENERATING STATION, UNITS 1 AND 2, ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT RELATING TO AN EXEMPTION FOR REQUALIFICATION TRAINING FOR SENIOR REACTOR OPERATORS LIMITED TO FUEL HANDLING (TAC NOS. M81918, M81919, M81920 and M81921)

Enclosed for your information is a copy of the "Environmental Assessment and Finding of No Significant Impact" related to your October 18, 1991 request for an exemption from the requirements of 10 CFR 55.59(a)(2) and 10 CFR 55.59(c)(4)(i).

The exemption you requested would 1) grant a one-time scheduler exemption to the eight Senior Reactor Operators limited to fuel handling (LSROs) who are licensed for the Limerick Generating Station (LGS) and the Peach Bottom Atomic Power Station (PBAPS) to take their first annual requalification operating test in January 1992 instead of the end of 1991 and 2) permit Philadelphia Electric Company and the eight LSROs to conduct the annual requalification operating tests for these multi-site licensed LSROs at alternating sites (i.e., one year at LGS and the next year at PBAPS) instead of an annual requalification operating test at each site. The docket numbers for the eight LSROs are: 50-61452, 50-61453, 50-61454, 50-61455, 50-61456, 50-61457, 50-61459 and 50-61461.

We have concluded that an exemption from the regulations is not required for you to administer annual operating tests to the multi-site licensed LSROs alternatively at Peach Bottom and Limerick. Peach Bottom, Units 2 and 3 and Limerick, Units 1 and 2 are all BWR-4s. The similarity of equipment, procedures and Technical Specifications for the two sites with respect to refueling operations do not require substantially different knowledge, skills and abilities. This was part of our evaluation when we granted dual licenses for both sites.

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Pursuant to 10 CFR 55.59(a)(2) and 10 CFR 55.59(c)(4)(i) licensed operators must successfully complete a requalification program that includes an annual operating test. In 10 CFR 55.4 the definition for cases where a license is issued for operation of two or more facilities, facility means all facilities identified in the license. Therefore, an operating test as described in 10 CFR 55.45, requires that the test be applicable to all of the units for which the LSRs are licensed. The annual operating test Philadelphia Electric Company administers to the LSRs consists of Job Performance Measures (JPMs) tailored to the knowledge, skills and abilities required to perform refueling activities. The operating tests administered to the multi-site licensed LSRs will have to include questions associated with each JPM that explore the differences, if any, between the task performed at the facility where the JPM was administered and the same task at the other facility. This will ensure that the operating test suffices as an examination for each facility. The arrangement to administer the annual examination alternately at Peach Bottom and Limerick, in addition to the evaluations performed by the facility at the end of each site specific training program, is fully acceptable and satisfies the 10 CFR Part 55 regulations. Thus, no exemption is required to conduct the examination at the alternate sites for which the LSRs are licensed.

The assessment is being 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

Enclosure:  
Environmental Assessment

cc w/enclosure:  
See next page

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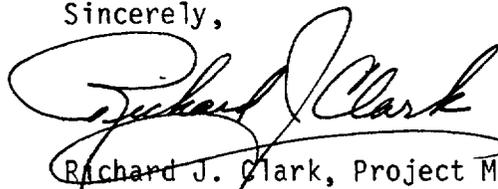
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Document Name: PB/LI EA M81918/M19/M20/M21

Pursuant to 10 CFR 55.59(a)(2) and 10 CFR 55.59(c)(4)(i) licensed operators must successfully complete a requalification program that includes an annual operating test. In 10 CFR 55.4 the definition for cases where a license is issued for operation of two or more facilities, facility means all facilities identified in the license. Therefore, an operating test as described in 10 CFR 55.45, requires that the test be applicable to all of the units for which the LSROs are licensed. The annual operating test Philadelphia Electric Company administers to the LSROs consists of Job Performance Measures (JPMs) tailored to the knowledge, skills and abilities required to perform refueling activities. The operating tests administered to the multi-site licensed LSROs will have to include questions associated with each JPM that explore the differences, if any, between the task performed at the facility where the JPM was administered and the same task at the other facility. This will ensure that the operating test suffices as an examination for each facility. The arrangement to administer the annual examination alternately at Peach Bottom and Limerick, in addition to the evaluations performed by the facility at the end of each site specific training program, is fully acceptable and satisfies the 10 CFR Part 55 regulations. Thus, no exemption is required to conduct the examination at the alternate sites for which the LSROs are licensed.

The assessment is being forwarded to the Office of the Federal Register for publication.

Sincerely,



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

Enclosure:  
Environmental Assessment

cc w/enclosure:  
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:

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Mr. George J. Beck  
Philadelphia Electric Company

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

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UNITED STATES NUCLEAR REGULATORY COMMISSIONPHILADELPHIA ELECTRIC COMPANYPUBLIC SERVICE ELECTRIC AND GAS COMPANYDELMARVA POWER AND LIGHT COMPANYATLANTIC CITY ELECTRIC COMPANYDOCKET NOS. 50-277, 50-278, 50-352 AND 50-353ENVIRONMENTAL ASSESSMENT AND FINDING OFNO SIGNIFICANT IMPACT

The U.S. Nuclear Regulatory Commission (NRC or the Commission) is considering issuance of an exemption to Philadelphia Electric Company, et. al. (PECo, the licensees), for operation of the Peach Bottom Atomic Power Station, Units 2 and 3, located in York County, Pennsylvania, and the Limerick Generating Station, Units 1 and 2, located in Montgomery and Chester Counties, Pennsylvania.

ENVIRONMENTAL ASSESSMENTIdentification of Proposed Action:

The proposed exemption would 1) grant 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 Need for the Proposed Action:

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,

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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, NRC, 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.

Environmental Impacts of the Proposed Action:

The proposed exemption from 10 CFR Part 55.59(c)(4)(i) and 10 CFR Part 55.59(a)(2) will not increase the probability or consequences of accidents, no changes are being made in the types of any effluents that may be released

offsite, and there is no significant cumulative radiation exposure. Accordingly, the Commission concludes that these proposed exemptions would result in no significant radiological environmental impact. Additionally, it does not affect non-radiological plant effluents and has no other environmental impact. Therefore, the Commission concludes that there are no significant impacts associated with the proposed exemptions.

Alternative to the Proposed Action:

Since the Commission concluded that there are no significant environmental affects that would result from the proposed action, any alternatives with equal or greater environmental impacts need not be evaluated.

The principal alternative would be to deny the requested exemptions. This would not reduce environmental impacts of plant operation and would result in reduced operational flexibility.

Alternative Use of Resources:

This proposed action does not involve the use of any resources not previously considered in the Final Environmental Statement for the Limerick Generating Station, dated April 1984 or the Final Environmental Statement for the Peach Bottom Atomic Power Station, dated April 1973.

Agencies and Persons Consulted:

The NRC staff reviewed the licensee's request and did not consult other agencies or persons.

FINDING OF NO SIGNIFICANT IMPACT

Based upon the foregoing environmental assessment, we conclude that the proposed action will not have a significant effect on the quality of the human environment.

The Commission has determined not to prepare an environmental impact statement for the proposed exemptions.

For further details with respect to this action, see the request for exemption dated October 18, 1991, which is available for public inspection at the Commission's Public Document Room, the Gelman Building, Lower Level, 2120 L Street, NW, Washington, DC, 20555, at the Limerick Local Public Document Room located at Pottstown Public Library, 500 High Street, Pottstown, Pennsylvania 18464 and at the Peach Bottom Local Public Document Room located at Government Publications Section, State Library of Pennsylvania, (REGIONAL DEPOSITORY) Education Building, Walnut Street and Commonwealth Avenue, Box 1601, Harrisburg, Pennsylvania 17105.

Dated at Rockville, Maryland this 10th day of December 1991.

FOR THE NUCLEAR REGULATORY COMMISSION



Charles L. Miller, Director  
Project Directorate I-2  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation