

May 7, 1992

Docket Nos. 50-277
and 50-278

Mr. George J. Beck
Manager-Licensing, MC 52A-5
Philadelphia Electric Company
Nuclear Group Headquarters
Correspondence Control Desk
P.O. Box No. 195
Wayne, Pennsylvania 19087-0195

Dear Mr. Beck:

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Wanda Jones, 7103	

SUBJECT: STATION QUALIFIED REVIEWER PROGRAM, TSCR NO. 89-10, PEACH BOTTOM
ATOMIC POWER STATION, UNIT NOS. 2 AND 3 (TAC NOS. 77184 AND 77185)

The Commission has issued the enclosed Amendments Nos. 167 and 171 to Facility Operating License Nos. DPR-44 and DPR-56 for the Peach Bottom Atomic Power Station, Unit Nos. 2 and 3. These amendments consist of changes to the Technical Specifications in response to your application dated July 13, 1990, as supplemented by letters dated November 27, 1991, and February 21, 1992.

These amendments change the Administrative Controls Section (Section 6.0) of the TSs, including the addition of a new TS Section 6.5.3, to reflect the implementation of a Station Qualified Reviewer Program for review and approval of new station programs, procedures, and changes thereto.

A copy of the Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's Bi-Weekly Federal Register Notice.

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. Amendment No. 167 to DPR-44
2. Amendment No. 171 to DPR-56
3. Safety Evaluation

cc w/enclosures:
See next page

*Previously Concurred

OFC	:PDI-2/LA	:PDI-2/PM	:PDI-2/PM	:LPEB*	:SC/LPEB*:C/LPEB*	:OGC*	:PDI-2/D
NAME	:MO'Brien	:RClark:rb	:JShea	:FAllenspach	:EMcKenna	:WBrach	:CMiller
DATE	:5/11/92	:4/23/92	:4/30/92	:01/09/92	:01/09/92	:01/09/92	:12/31/91:5/7/92

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

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Mr. George J. Beck
Manager-Licensing, MC 52A-5
Philadelphia Electric Company
Nuclear Group Headquarters
Correspondence Control Desk
P.O. Box No. 195
Wayne, Pennsylvania 19087-0195

Dear Mr. Beck:

SUBJECT: STATION QUALIFIED REVIEWER PROGRAM, TSCR NO. 89-10 PEACH BOTTOM
ATOMIC POWER STATION, UNIT NOS. 2 AND 3 (TAC NOS. 77184 AND 77185)

The Commission has issued the enclosed Amendments Nos. 167 and 171 to Facility Operating License Nos. DPR-44 and DPR-56 for the Peach Bottom Atomic Power Station, Unit Nos. 2 and 3. These amendments consist of changes to the Technical Specifications in response to your application dated July 13, 1990, as supplemented by letters dated November 27, 1991, and February 21, 1992.

These amendments change the Administrative Controls Section (Section 6.0) of the TSs, including the addition of a new TS Section 6.5.3, to reflect the implementation of a Station Qualified Reviewer Program for review and approval of new station programs, procedures, and changes thereto.

A copy of the Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's Bi-Weekly Federal Register Notice.

Sincerely,

A handwritten signature in cursive script that reads "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. Amendment No. 167 to DPR-44
2. Amendment No. 171 to DPR-56
3. Safety Evaluation

cc w/enclosures:
See next page

Mr. George J. Beck
Philadelphia Electric Company

Peach Bottom Atomic Power Station,
Units 2 and 3

cc:

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Sr. V.P. & General Counsel
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Pennsylvania Department of
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Harrisburg, Pennsylvania 17120

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

Public Service Commission of Maryland
Engineering Division
ATTN: Chief Engineer
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

PHILADELPHIA ELECTRIC COMPANY
PUBLIC SERVICE ELECTRIC AND GAS COMPANY
DELMARVA POWER AND LIGHT COMPANY
ATLANTIC CITY ELECTRIC COMPANY

DOCKET NO. 50-277

PEACH BOTTOM ATOMIC POWER STATION, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 167
License No. DPR-44

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Philadelphia Electric Company, et. al. (the licensee) dated July 13, 1990, as supplemented by letters dated November 27, 1991, and February 21, 1992, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I.
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health or safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C(2) of Facility Operating License No. DPR-44 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 167, are hereby incorporated in the license. PECO shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Charles J. Miller

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

Attachment:
Changes to the Technical
Specifications

Date of Issuance: May 7, 1992

ATTACHMENT TO LICENSE AMENDMENT NO. 167

FACILITY OPERATING LICENSE NO. DPR-44

DOCKET NO. 50-277

Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. The revised areas are indicated by marginal lines.

<u>Remove</u>	<u>Insert</u>
247	247
248	248
252a	252a
253	253
254	254
260	260

Meeting Frequency

- 6.5.1.4 The PORC shall meet at least once per calendar month and as convened by the PORC Chairman or his designated alternate(s).

Quorum

- 6.5.1.5 A quorum of the PORC necessary for the performance of the PORC responsibilities and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate(s) and four members or their alternates.

Responsibilities

- 6.5.1.6 The Plant Operations Review Committee shall be responsible for:
- a. Review of 1) Administrative procedures and changes thereto, 2) new procedures requiring a 10 CFR 50.59 safety evaluation, and 3) proposed changes to procedures requiring a 10 CFR 50.59 safety evaluation.
 - b. Review of all proposed tests and experiments that affect nuclear safety.
 - c. Review of all proposed changes to the Technical Specifications.
 - d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
 - e. Investigation of all violations of the Technical Specifications and shall prepare and forward a report covering evaluation and recommendations to prevent recurrence to the Plant Manager, the Vice President, Peach Bottom Atomic Power Station, and the Nuclear Review Board.
 - f. Review of facility operations to detect potential safety hazards.
 - g. Performance of special reviews and investigations and reports thereon as requested by the Chairman of the Nuclear Review Board.
 - h. Review of all reportable events required by 10 CFR 50.73.

PBAPS

6.5.1.6 Continued

- i. Review of the Plant Security Plan, and shall submit recommended changes to the Plan to the Plant Manager and the Nuclear Review Board.
- j. Review of the Emergency Plan, and shall submit recommended changes to the Plan to the Plant Manager and the Nuclear Review Board.
- k. Review of every unplanned release reportable under 10CFR 50.72 and 50.73, of radioactive material to the environs; evaluate the event; specify remedial action to prevent recurrence; and document the event description, evaluation, and corrective action and the disposition of the corrective action in the plant records.

Authority

6.5.1.7 The Plant Operations Review Committee shall:

- a. Recommend in writing, to the Plant Manager, for his approval or disapproval of items considered under 6.5.1.6(a) through (d) above.
- b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6(b) through (e) above constitutes an unreviewed safety question, as defined in 10 CFR 50.59.
- c. Provide immediate written notification to the Vice President, Peach Bottom Atomic Power Station, or in his absence, the Senior Vice President - Nuclear and the Nuclear Review Board of disagreement between the PORC and the Plant Manager; however, the Plant Manager shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

- c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the Senior Vice President-Nuclear, and to the management positions responsible for the areas audited within 30 days after completion of the audit.

6.5.3 Procedure Review and Approval

- 6.5.3.1 Each new procedure and procedure change shall be reviewed by a Station Qualified Reviewer (SQR) and then by a Superintendent designated as responsible for the procedure. Administrative procedures (and changes thereto) shall be reviewed by PORC prior to approval by the Plant Manager or his designated alternate in accordance with Specification 6.1.1. The SQR shall not be the individual who prepared the new procedure or procedure change, he may however be from the same organization as the preparer. In addition to performing procedure reviews, the responsible Superintendents shall ensure that a sufficient complement of SQR's for their functional area is maintained. PORC shall have the option to review new procedures or procedure changes without the prior review and approval of the SQR and responsible Superintendent. Procedures reviewed in this manner will be approved by the Plant Manager.
- 6.5.3.2 Unless preempted by PORC as described in 6.5.3.1, the SQR shall review each new procedure or procedure change. The SQR shall render a determination in writing of whether or not a cross-disciplinary review of the new procedure or procedure change is necessary. If such a review is determined to be necessary, it shall be performed by the appropriate personnel. Upon completion of the SQR review, each new procedure or procedure change shall be reviewed by the Superintendent designated by Administrative procedures as the responsible Superintendent for that procedure. The Superintendent shall, as part of his review, decide whether or not a 10 CFR 50.59 Safety Evaluation is required. If a Safety Evaluation is not required, the new procedure or procedure change shall be approved by the responsible Superintendent or the Plant Manager prior to implementation.
- 6.5.3.3 If the responsible Superintendent determines that a new procedure or procedure change requires a 10 CFR 50.59 Safety Evaluation, the responsible Superintendent shall render a determination in writing of whether or not the new procedure or procedure change involves an Unreviewed Safety Question (USQ). The responsible Superintendent shall then forward the new procedure or procedure change with the associated Safety Evaluation to PORC for review. If an USQ is involved, prior NRC approval is required per 10 CFR 50.59 before implementation of the new procedure or procedure change.
- 6.5.3.4 Personnel recommended to perform the function of SQR shall be approved and designated as such by the PORC Chairman. The SQR shall be an individual from the responsible organization and knowledgeable in the functional area affected. The individual shall meet the qualifications of ANSI/ANS-3.1-1981, Selection, Qualification and Training of Personnel for Nuclear Power Plants, Section 4, excluding subsections 4.3.2 and 4.5. Individuals who do not possess the formal educational requirements specified shall not be automatically eliminated where other factors provide sufficient demonstration of their abilities. These factors, as listed in subsection 4.1 of ANSI/ANS-3.1, shall be evaluated on a case-by-case basis and approved and documented by the PORC Chairman.
- 6.5.3.5 Temporary procedure changes shall be reviewed and approved in accordance with Specification 6.8.3.
- 6.5.3.6 Records documenting the activities performed under Specification 6.5.3.1 through 6.5.3.5 shall be maintained in accordance with Specification 6.10.

PBAPS

6.6 Reportable Event Action

6.6.1 The following actions shall be taken for Reportable Events:

- a. The Commission shall be notified pursuant to the requirements of Section 50.73 to 10 CFR 50.
- b. Each Reportable Event Report submitted to the Commission shall be reviewed by the PORC and submitted to the NRB and the Vice President, Peach Bottom Atomic Power Station.

6.7 Safety Limit Violation

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The provisions of 10 CFR 50.36(c)(1)(i) shall be complied with immediately.
- b. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Vice President, Peach Bottom Atomic Power Station, Plant Manager, and the NRB shall be notified within 24 hours.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PORC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the NRB and the Vice President, Peach Bottom Atomic Power Station within 10 working days of the violation.

6.8 Procedures

6.8.1 Written procedures and administrative policies shall be established, implemented and maintained as follows, except as provided in Technical Specifications 6.8.2 and 6.8.3:

- a. Procedures that meet the requirements of Sections 5.1 and 5.3 of ANSI N18.7-1972
- b. Procedures that meet the requirements of Appendix "A" of USAEC Regulatory Guide 1.33 (November 1972)
- c. Procedures covering radiological effluent technical specification activities, including the Offsite Dose Calculation Manual and Quality Assurance Program for environmental monitoring using the guidance in Regulatory Guide 4.1, Revision 1, April 1975.

- 6.8.2 Each procedure and administrative policy of Technical Specification 6.8.1 and changes thereto, and any other procedure or procedure change that the Plant Manager determines to affect nuclear safety shall be reviewed and approved in accordance with Technical Specification 6.5.3 (and 6.5.1.6.a and 6.5.1.7.a, if required) prior to implementation. Each procedure of Technical Specification 6.8.1 shall also be reviewed periodically as set forth in Administrative procedures.
- 6.8.3 Temporary changes to procedures of Technical Specification 6.8.1 above may be made, provided:
- a. The intent of the original procedure is not altered.
 - b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.
 - c. Within 14 days of implementation, the change is documented, reviewed by an SQR in accordance with Technical Specification 6.5.3.1, and approved by either the Plant Manager (or his designated alternate in accordance with Technical Specification 6.1.1) or the Superintendent designated by Administrative procedures as the responsible Superintendent for that procedure.
- 6.8.4 (Relocated into 6.8.1.c)

6.9 Reporting Requirements

In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following identified reports shall be submitted to the NRC in accordance with 10 CFR 50.4, "Written Communications".

PBAPS

6.10 Record Retention

6.10.1 The following records shall be retained for at least five years:

- a. Records and logs of facility operation covering time interval at each power level.
- b. Records and logs of principle maintenance activities, inspections, repair and replacement of principle items of equipment related to nuclear safety.
- c. Reportable Event Reports required by 10 CFR 50.73.
- d. Records of surveillance activities, inspections and calibrations required by these Technical Specifications.
- e. Records of reactor tests and experiments.
- f. Records of changes made to procedures required by Specification 6.8.
- g. Records of radioactive shipments.
- h. Records of sealed source leak tests and results.
- i. Records of annual physical inventory of all source material of record.

6.10.2 The following records shall be retained for the duration of the Facility Operating License:

- a. Record and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- c. Records of facility radiation and contamination surveys.



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

PHILADELPHIA ELECTRIC COMPANY
PUBLIC SERVICE ELECTRIC AND GAS COMPANY
DELMARVA POWER AND LIGHT COMPANY
ATLANTIC CITY ELECTRIC COMPANY

DOCKET NO. 50-278

PEACH BOTTOM ATOMIC POWER STATION, UNIT NO. 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 171
License No. DPR-56

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Philadelphia Electric Company, et. al. (the licensee) dated July 13, 1990, as supplemented by letters dated November 27, 1991, and February 21, 1992, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I.
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health or safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C(2) of Facility Operating License No. DPR-56 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 171, are hereby incorporated in the license. PECO shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Charles L. Miller

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

Attachment:
Changes to the Technical
Specifications

Date of Issuance: May 7, 1992

ATTACHMENT TO LICENSE AMENDMENT NO. 171

FACILITY OPERATING LICENSE NO. DPR-56

DOCKET NO. 50-278

Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. The revised areas are indicated by marginal lines.

<u>Remove</u>	<u>Insert</u>
247	247
248	248
252a	252a
253	253
254	254
260	260

PBAPS

Meeting Frequency

- 6.5.1.4 The PORC shall meet at least once per calendar month and as convened by the PORC Chairman or his designated alternate(s).

Quorum

- 6.5.1.5 A quorum of the PORC necessary for the performance of the PORC responsibilities and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate(s) and four members or their alternates.

Responsibilities

- 6.5.1.6 The Plant Operations Review Committee shall be responsible for:
- a. Review of 1) Administrative procedures and changes thereto, 2) new procedures requiring a 10 CFR 50.59 safety evaluation, and 3) proposed changes to procedures requiring a 10 CFR 50.59 safety evaluation.
 - b. Review of all proposed tests and experiments that affect nuclear safety.
 - c. Review of all proposed changes to the Technical Specifications.
 - d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
 - e. Investigation of all violations of the Technical Specifications and shall prepare and forward a report covering evaluation and recommendations to prevent recurrence to the Plant Manager, the Vice President, Peach Bottom Atomic Power Station, and the Nuclear Review Board.
 - f. Review of facility operations to detect potential safety hazards.
 - g. Performance of special reviews and investigations and reports thereon as requested by the Chairman of the Nuclear Review Board.
 - h. Review of all reportable events required by 10 CFR 50.73.

PBAPS

6.5.1.6 Continued

- i. Review of the Plant Security Plan, and shall submit recommended changes to the Plan to the Plant Manager and the Nuclear Review Board.
- j. Review of the Emergency Plan, and shall submit recommended changes to the Plan to the Plant Manager and the Nuclear Review Board.
- k. Review of every unplanned release reportable under 10CFR 50.72 and 50.73, of radioactive material to the environs; evaluate the event; specify remedial action to prevent recurrence; and document the event description, evaluation, and corrective action and the disposition of the corrective action in the plant records.

Authority

6.5.1.7 The Plant Operations Review Committee shall:

- a. Recommend in writing, to the Plant Manager, for his approval or disapproval of items considered under 6.5.1.6(a) through (d) above.
- b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6(b) through (e) above constitutes an unreviewed safety question, as defined in 10 CFR 50.59.
- c. Provide immediate written notification to the Vice President, Peach Bottom Atomic Power Station, or in his absence, the Senior Vice President - Nuclear and the Nuclear Review Board of disagreement between the PORC and the Plant Manager; however, the Plant Manager shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

- c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the Senior Vice President-Nuclear, and to the management positions responsible for the areas audited within 30 days after completion of the audit.

6.5.3 Procedure Review and Approval

- 6.5.3.1 Each new procedure and procedure change shall be reviewed by a Station Qualified Reviewer (SQR) and then by a Superintendent designated as responsible for the procedure. Administrative procedures (and changes thereto) shall be reviewed by PORC prior to approval by the Plant Manager or his designated alternate in accordance with Specification 6.1.1. The SQR shall not be the individual who prepared the new procedure or procedure change, he may however be from the same organization as the preparer. In addition to performing procedure reviews, the responsible Superintendents shall ensure that a sufficient complement of SQR's for their functional area is maintained. PORC shall have the option to review new procedures or procedure changes without the prior review and approval of the SQR and responsible Superintendent. Procedures reviewed in this manner will be approved by the Plant Manager.
- 6.5.3.2 Unless preempted by PORC as described in 6.5.3.1, the SQR shall review each new procedure or procedure change. The SQR shall render a determination in writing of whether or not a cross-disciplinary review of the new procedure or procedure change is necessary. If such a review is determined to be necessary, it shall be performed by the appropriate personnel. Upon completion of the SQR review, each new procedure or procedure change shall be reviewed by the Superintendent designated by Administrative procedures as the responsible Superintendent for that procedure. The Superintendent shall, as part of his review, decide whether or not a 10 CFR 50.59 Safety Evaluation is required. If a Safety Evaluation is not required, the new procedure or procedure change shall be approved by the responsible Superintendent or the Plant Manager prior to implementation.
- 6.5.3.3 If the responsible Superintendent determines that a new procedure or procedure change requires a 10 CFR 50.59 Safety Evaluation, the responsible Superintendent shall render a determination in writing of whether or not the new procedure or procedure change involves an Unreviewed Safety Question (USQ). The responsible Superintendent shall then forward the new procedure or procedure change with the associated Safety Evaluation to PORC for review. If an USQ is involved, prior NRC approval is required per 10 CFR 50.59 before implementation of the new procedure or procedure change.
- 6.5.3.4 Personnel recommended to perform the function of SQR shall be approved and designated as such by the PORC Chairman. The SQR shall be an individual from the responsible organization and knowledgeable in the functional area affected. The individual shall meet the qualifications of ANSI/ANS-3.1-1981, Selection, Qualification and Training of Personnel for Nuclear Power Plants, Section 4, excluding subsections 4.3.2 and 4.5. Individuals who do not possess the formal educational requirements specified shall not be automatically eliminated where other factors provide sufficient demonstration of their abilities. These factors, as listed in subsection 4.1 of ANSI/ANS-3.1, shall be evaluated on a case-by-case basis and approved and documented by the PORC Chairman.
- 6.5.3.5 Temporary procedure changes shall be reviewed and approved in accordance with Specification 6.8.3.
- 6.5.3.6 Records documenting the activities performed under Specification 6.5.3.1 through 6.5.3.5 shall be maintained in accordance with Specification 6.10.

PBAPS

6.6 Reportable Event Action

6.6.1 The following actions shall be taken for Reportable Events:

- a. The Commission shall be notified pursuant to the requirements of Section 50.73 to 10 CFR 50.
- b. Each Reportable Event Report submitted to the Commission shall be reviewed by the PORC and submitted to the NRB and the Vice President, Peach Bottom Atomic Power Station.

6.7 Safety Limit Violation

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The provisions of 10 CFR 50.36(c)(1)(i) shall be complied with immediately.
- b. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Vice President, Peach Bottom Atomic Power Station, Plant Manager, and the NRB shall be notified within 24 hours.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PORC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the NRB and the Vice President, Peach Bottom Atomic Power Station within 10 working days of the violation.

6.8 Procedures

6.8.1 Written procedures and administrative policies shall be established, implemented and maintained as follows, except as provided in Technical Specifications 6.8.2 and 6.8.3:

- a. Procedures that meet the requirements of Sections 5.1 and 5.3 of ANSI N18.7-1972
- b. Procedures that meet the requirements of Appendix "A" of USAEC Regulatory Guide 1.33 (November 1972)
- c. Procedures covering radiological effluent technical specification activities, including the Offsite Dose Calculation Manual and Quality Assurance Program for environmental monitoring using the guidance in Regulatory Guide 4.1, Revision 1, April 1975.

- 6.8.2 Each procedure and administrative policy of Technical Specification 6.8.1 and changes thereto, and any other procedure or procedure change that the Plant Manager determines to affect nuclear safety shall be reviewed and approved in accordance with Technical Specification 6.5.3 (and 6.5.1.6.a and 6.5.1.7.a, if required) prior to implementation. Each procedure of Technical Specification 6.8.1 shall also be reviewed periodically as set forth in Administrative procedures.
- 6.8.3 Temporary changes to procedures of Technical Specification 6.8.1 above may be made, provided:
- a. The intent of the original procedure is not altered.
 - b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.
 - c. Within 14 days of implementation, the change is documented, reviewed by an SQR in accordance with Technical Specification 6.5.3.1, and approved by either the Plant Manager (or his designated alternate in accordance with Technical Specification 6.1.1) or the Superintendent designated by Administrative procedures as the responsible Superintendent for that procedure.

6.8.4 (Relocated into 6.8.1.c)

6.9 Reporting Requirements

In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following identified reports shall be submitted to the NRC in accordance with 10 CFR 50.4, "Written Communications".

PBAPS

6.10 Record Retention

6.10.1 The following records shall be retained for at least five years:

- a. Records and logs of facility operation covering time interval at each power level.
- b. Records and logs of principle maintenance activities, inspections, repair and replacement of principle items of equipment related to nuclear safety.
- c. Reportable Event Reports required by 10 CFR 50.73.
- d. Records of surveillance activities, inspections and calibrations required by these Technical Specifications.
- e. Records of reactor tests and experiments.
- f. Records of changes made to procedures required by Specification 6.8.
- g. Records of radioactive shipments.
- h. Records of sealed source leak tests and results.
- i. Records of annual physical inventory of all source material of record.

6.10.2 The following records shall be retained for the duration of the Facility Operating License:

- a. Record and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- c. Records of facility radiation and contamination surveys.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NOS. 167 AND 171 TO FACILITY OPERATING

LICENSE NOS. DPR-44 and DPR-56

PHILADELPHIA ELECTRIC COMPANY
PUBLIC SERVICE ELECTRIC AND GAS COMPANY
DELMARVA POWER AND LIGHT COMPANY
ATLANTIC CITY ELECTRIC COMPANY

PEACH BOTTOM ATOMIC POWER STATION, UNIT NOS. 2 AND 3

DOCKET NOS. 50-277 AND 50-278

1.0 INTRODUCTION

By letter dated July 13, 1990, and supplemented by letters dated November 27, 1991, and February 21, 1992, the Philadelphia Electric Company, Public Service Electric & Gas Company, Delmarva Power and Light Company and Atlantic City Electric Company (the licensees) submitted a request for changes to the Peach Bottom Atomic Power Station, Unit Nos. 2 and 3, Technical Specifications (TS). These proposed amendments would change the Administrative Controls section (Section 6.0) of the TS, including the addition of a new TS Section 6.5.3, to reflect the implementation of a Station Qualified Reviewer (SQR) Program for review and approval of new station programs, procedures, and changes thereto. The SQR Program is a program/procedural review and approval process using qualified reviewers to perform a review and designated Superintendents for approval of new programs, procedures, and changes thereto. This program has been approved by the NRC for a number of facilities, including the Public Service Electric and Gas (PSE&G) Company facilities and the Limerick Generating Station, which is also operated by Philadelphia Electric Company (PECo). The supplemental letters did not change the initial proposed no significant hazards consideration determination.

2.0 EVALUATION

The purpose for establishing the SQR Program is to shift more responsibility for safety reviews to the line organizations and to alter the scope of Plant Operations Review Committee (PORC) reviews to be more appropriate for that of a safety oversight committee. In lieu of the PORC reviewing every new procedure and every procedure change, PORC will review those that require a 10 CFR 50.59 Safety Evaluation and any Administrative procedure or change thereto. An SQR and a station Superintendent or Manager will review each new procedure and procedure change. Rather than the Plant Manager approving every new procedure and every procedure change, appropriate station Superintendents or Managers will approve those that do not require a 10 CFR 50.59 Safety Evaluation. An SQR, rather than PORC, will review temporary procedure changes

after implementation, and appropriate Superintendents or Managers will be permitted to approve temporary procedure changes after implementation, rather than only the Plant Manager being permitted to approve them. The Plant Manager will continue to approve Administrative procedures, Security Plan implementing procedures and Emergency Plan implementing procedures.

Section 13.5.1 (Administrative Procedures) of the Standard Review Plan (SRP) requires that the staff determine that "the applicant has described the program and procedures that provide administrative controls over activities important to safety. These include the activities of the preparation, review, and approval of plant operating and maintenance procedures," For Peach Bottom, PECO had proposed in Section 13.8.2 of the Final Safety Analysis Report (FSAR) that the Plant Operations Review Committee (PORC), among many other responsibilities, review all procedures required by TS 6.8 and changes thereto and to recommend, in writing, to the Plant Manager, for his approval or disapproval, the Committee's evaluation of the proposed procedure. Section 6.8.2 of the present TSs requires that each procedure and administrative policy, and changes thereto, shall be reviewed by the PORC and approved by the Plant Manager or his designated alternate, prior to implementation. Furthermore, Section 6.8.2 also requires that these procedures be reviewed periodically.

At Peach Bottom there are in the order of 8000 procedures covering everything from operations, maintenance, security, emergency preparedness, fire protection, procurement, etc. During initial operation, when many new procedures were being developed, the applicant's proposal to have procedures reviewed by PORC was an acceptable means of providing administrative controls over activities important to safety (SRP 13.5.1). The major workload now is not development of new procedures but the TS requirement (per R.G. 1.33) to periodically review all procedures and improvements to procedures indicated by plant experience. The present requirement to have PORC review all procedures and programs has worked satisfactorily. There have been no significant regulatory concerns identified with PORC's review of programs and procedures. Since the present system is working - from a regulatory standpoint - the staff assessed the disadvantages of the present arrangement as part of our assessment of whether the proposed new program (the SQR) would provide an acceptable level of control over programs and procedures.

As prescribed in Section 6.5.1 of the TSs, the Plant Operations Review Committee (PORC) functions to advise the Plant Manager on all matters related to nuclear safety. The composition of the PORC is specified in Section 6.5.1.2 of the TSs and includes the four Superintendents that report to the Plant Manager, the Assistant Superintendent-Operations, the Regulatory Engineer, the Systems Engineer, a Shift Manager and the Maintenance Engineer (9 members). This is essentially the entire senior management for plant operation of which a quorum must be present. While there are provisions for a PORC member being on vacation or in training, the TSs specify that "no more than two alternates shall participate as voting members in PORC activities at any one time."

The licensee has spelled-out in the proposed new TS Section 6.5.3 and in their submittal how the SQR Program will function. The key points of the proposed program are as follows:

- ° There will be no change in reviewing new or revised Administrative procedures, Security Plan implementing procedures and Emergency Plan implementing procedures, inasmuch as the impact of these procedures crosses several organizational boundaries. (Administrative procedures are the "highest" level of procedures.) PORC will review these procedures and recommend to the Plant Manager whether he should approve them.
- ° PORC will continue to review procedures and procedure changes that require a 10 CFR 50.59 Safety Evaluation. After considering PORC's recommendation regarding the documents, the Plant Manager approves or rejects the procedure or procedure change and associated Safety Evaluation, if one is required. Unreviewed Safety Question (USQ) determinations are governed by a Nuclear Group Administrative Procedure for 10 CFR 50.59 reviews of changes, tests and experiments, including procedure changes. This Nuclear Group Procedures, NA-02R002, Revision 0, dated November 3, 1989 applies to the entire nuclear group (i.e., corporate, licensing, Limerick and Peach Bottom). This procedure embodies the guidance in NSAC/125, "Guidelines for 10 CFR 50.59 Safety Evaluations," June 1989.
- ° The PORC Chairman approves plant personnel recommended to be Station Qualified Reviewers (SQRs) for specific types of programs and classes of procedures. The SQR will be an individual knowledgeable in the functional area affected and may be from the same organization, but who is not the individual preparer.
- ° The Plant Manager, as authorized by Administrative Procedures, appoints plant Superintendents to be responsible for approving specific types of programs and classes of procedures. The appointed Superintendent will be the individual responsible for and cognizant of the affected functional area. PECO emphasized in their application that the term "responsible Superintendent" as used in the proposed TSs is meant to identify a minimum level of management and not just a person with the specific title. At Peach Bottom, as at Limerick, there are two other Managers on the same level as the Plant Manager - the Project Manager and the Support Manager. Both are responsible for numerous procedures (fire protection, receiving, warehousing, purchasing, storage, QA, testing of the siren system, testing of emergency phones, surveillance tests of the intrusion detection equipment, etc., etc.) Both of the Managers could approve procedures under the SQR Program. The positions which PECO is proposing to designate as approving authorities under the SQR Program are: the Plant Manager, the Project Manager, the Support

Manager, the Superintendent-Training, the Superintendent-Operations, the Superintendent-Technical, the Superintendent-Plant Services and the Superintendent-Maintenance/I&C.

- ° Each new program, procedure, or change thereto is reviewed by the designated SQR. The SQR determines when a cross-disciplinary review by other personnel is necessary prior to approval. The new program, procedure, or change thereto and accompanying 10 CFR 50.59 Review documentation (i.e., evaluation of the proposed change, new procedure or new program in accordance with 10 CFR 50.59) is reviewed by the responsible Superintendent, including a determination as to whether a 10 CFR 50.59 safety evaluation is required or not. If not, the new program, procedure, or change thereto is then approved by the responsible Superintendent or the Plant Manager. If a 10 CFR 50.59 safety evaluation is required, the entire new program, procedure, or change package, including the 10 CFR 50.59 safety evaluation, is reviewed by PORC.
- ° Temporary procedure changes (TPCs) will be implemented as before; however, the TPC will be reviewed by the designated SQR (including a cross-disciplinary review if necessary) and approved by the Plant Manager or responsible Superintendent, as appropriate, within 14 days of implementation.
- ° The SQR is not to be the person who prepared the procedure (or revision), even if serving in an acting capacity. For example, a person who is designated as acting Superintendent could not approve a procedure for which he had been the SQR.

In accordance with a 1989 agreement with the Commonwealth of Pennsylvania, PECO committed to require that members of the facility staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1981 standard "Selection, Qualification and Training of Personnel for Nuclear Power Plants". The personnel who will be approved as SQRs at Peach Bottom will be members of the facility staff and thus will be required to meet the ANSI/ANS 3.1 qualifications. With respect to the qualifications of the SQRs in Section 6.5.3, PECO had stated in the proposed TSs that the SQRs would be an individual from the responsible organization, that they would be knowledgeable in the functional area affected, that they would be recommended in writing by the appropriate Superintendent/Manager, documenting the qualifications of the proposed individual, and they would be approved by the PORC chairman. The NRC staff's position was that there should be some minimum academic/experience credentials specified for the SQRs along the lines of the qualifications in Section 4.4 of ANSI/ANS-3.1-1981. Our basis for this position was that the SQR has to have the background to assess the impact of procedure revisions on plant safety, to evaluate whether a cross disciplinary review is indicated and to determine whether a 10 CFR 50.59 safety evaluation is required. From discussions with the licensee, most of the individuals they considered as potential nominees to be SQRs, such as system engineers, would likely have a background as described

in Section 4.4 ("Professional-Technical") of ANSI/ANS-3.1-1981. For most categories, this section (4.4) requires a bachelor or associate degree in engineering or related sciences along with certain nuclear power plant experience. The licensee's interpretation of "related sciences" would include degrees in disciplines such as criminology for security personnel.

The licensee advised us that in two areas, the most qualified individuals to potentially serve as SQRs did not have the academic credentials specified in Section 4.4. but did have many years of nuclear power plant experience and/or had qualified as a Senior Reactor Operator (SRO). The educational, work experience, training and other qualifications which PECO was considering for potential SQRs was the subject of several conference calls (July 30, 1991, November 15, 1991, etc.). An example of what we would not consider as adequate background would be the standard in Section 4.3.2 ("Supervisors not requiring NRC licenses) of ANSI/ANS-3.1-1981. This section only requires an individual to have a high school diploma, four years of experience in the craft or discipline and only one year of nuclear power plant experience. As a result of these discussions, by letter dated November 27, 1991, PECO submitted a revised Section 6.5.3 on page 252a of the TSs for both units. In this revised paragraph, PECO proposed that "the individual shall meet the qualifications of ANSI/ANS-3.1-1981, Selection, Qualification and Training of Personnel for Nuclear Power Plants, Section 4, excluding subsection 4.5". The staff concluded that the proposed revision was acceptable except that it did not exclude subsection 4.3.2. This was discussed with the licensee on December 13, 1991. The staff presented the basis for excluding subsection 4.3.2 because of the minimal academic and work experience standards as discussed previously. The licensee agreed with the staff's proposal to add subsection 4.3.2 as an additional exclusion in Section 6.5.3 (page 252a) of the revised TSs. This change was submitted by the licensee's letter of February 21, 1992. The licensee also advised us that although Section 4.5.12 relates to "Licensed Operators", they did not interpret this to exclude personnel qualified as SROs (but not ROs) with many years of nuclear power plant experience. The supplemental requirements which the licensee added to Section 6.5.3 of the TSs in their letters of November 27, 1991 and February 21, 1992 do not change the staff's no significant hazards consideration.

Based on our evaluation, we conclude that the proposed SQR program at Peach Bottom will provide adequate control over activities important to safety, including the preparation, revision, review and approval of programs and procedures and changes thereto. The proposed changes to the TS are acceptable.

The licensee has also proposed some minor administrative changes to the TSs. The first change is merely a format change of Specification 6.8.1 to itemize the procedures which are required to be established, implemented and maintained. Also, in order to specify all of the required procedures in one

location, the procedures currently specified in 6.8.4 have been relocated into the reformatted 6.8.1. The second change broadens the records retention requirements of Specification 6.10 to include records of changes to all of the procedures required by Specification 6.8. Currently, only records of Operating procedure changes need to be retained in accordance with Specification 6.10.1.f. Lastly, in several locations references to other Technical Specifications were clarified by stating "Specification" or "Technical Specification" before the number referenced in the text. These changes are administrative in nature, have no safety significance and are acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Pennsylvania State official was notified of the proposed issuance of the amendments. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendments relate to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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