

October 31, 1988

Docket No.: 50-352

DISTRIBUTION:

Mr. William M. Alden  
Director-Licensing

Philadelphia Electric Company  
2301 Market Street  
Philadelphia, Pennsylvania 19101

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RClark (2)	Tech Branch-Fallenspach	
MO'Brien		

Dear Mr. Alden:

SUBJECT: CORPORATE AND STATION STAFF ORGANIZATIONAL STRUCTURE (TAC NO. 66676)

RE: LIMERICK GENERATING STATION, UNIT 1

The Commission has issued the enclosed Amendment No. 10 to Facility Operating License No. NPF-39 for the Limerick Generating Station, Unit 1. This amendment consists of changes to the Technical Specifications (TSs) in response to your application dated November 18, 1987.

This amendment modifies Section 6 of the facility Technical Specifications to reflect (I) a new corporate and (II) a new plant staff organizational structure, and (III) a revised composition of the Plant Operations Review Committee.

A copy of our Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly 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:

- Amendment No. 10 to License No. NPF-39
- Safety Evaluation

cc w/enclosures:  
See next page

PDI-2/CA  
MO'Brien  
10/18/88

PDI-2/PM  
RClark:lc  
10/19/88

OGC  
CPW  
10/20/88

PDI-2/D  
WButler  
10/27/88  
WB  
DFOL  
11

8811080329 881031  
PDR ADOCK 05000352  
P FDC

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

FOR THE NUCLEAR REGULATORY COMMISSION

/S/

Walter R. Butler, Director  
Project Directorate I-2  
Division of Reactor Projects I/II

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: October 31, 1988

PDI-2/LA  
MO'Byten  
10/18/88

PDI-2/PM  
RClark:kb  
09/23/88  
10/19/88

OGC  
CPW  
10/20/88

PDI-2/D  
WButler  
10/27/88

W



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

October 31, 1988

Docket No.: 50-352

Mr. William M. Alden  
Director-Licensing  
Philadelphia Electric Company  
2301 Market Street  
Philadelphia, Pennsylvania 19101

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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. 10 to License No. NPF-39
2. Safety Evaluation

cc w/enclosures:  
See next page

Mr. William M. Alden  
Philadelphia Electric Company

Limerick Generating Station  
Units 1 & 2

cc:

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

PHILADELPHIA ELECTRIC COMPANY

DOCKET NO. 50-352

LIMERICK GENERATING STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 10  
License No. NPF-39

1. The Nuclear Regulatory Commission (the Commission) has found that
  - A. The application for amendment by Philadelphia Electric Company (the licensee) dated November 18, 1987, 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 and 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. NPF-39 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 10, are hereby incorporated into this license. Philadelphia Electric Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

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PDR ADCK 05000352  
P PDC

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

FOR THE NUCLEAR REGULATORY COMMISSION



Walter R. Butler, Director  
Project Directorate I-2  
Division of Reactor Projects I/II

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: October 31, 1988

ATTACHMENT TO LICENSE AMENDMENT NO. 10

FACILITY OPERATING LICENSE NO. NPF-39

DOCKET NO. 50-352

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change. Overleaf pages are provided to maintain document completeness.\*

<u>Remove</u>	<u>Insert</u>
6-1	6-1
6-2	6-2
6-3	6-3
6-4	6-4
6-5*	6-5*
6-6	6-6
6-7	6-7
6-8	6-8
6-9	6-9
6-10*	6-10*
6-11	6-11
6-12	6-12
6-13	6-13
6-14*	6-14*

## 6.0 ADMINISTRATIVE CONTROLS

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### 6.1 RESPONSIBILITY

6.1.1 The Plant Manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 The Shift Supervisor, or during his absence from the control room, a designated individual shall be responsible for the control room command function. A management directive to this effect, signed by the Vice President, Limerick Generating Station shall be reissued to all station personnel on an annual basis.

### 6.2 ORGANIZATION

#### OFFSITE

6.2.1 The offsite organization for unit management and technical support shall be as shown on Figure 6.2.1-1.

#### UNIT STAFF

6.2.2 The unit organization shall be as shown on Figure 6.2.2-1 and:

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2.2-1;
- b. At least one licensed Operator shall be in the control room when fuel is in the reactor. In addition, while the unit is in OPERATIONAL CONDITION 1, 2, or 3, at least one licensed Senior Operator shall be in the control room;
- c. A Health Physics Technician\* shall be on site when fuel is in the reactor;
- d. ALL CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Operator or licensed Senior Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation;
- e. A site fire brigade of at least five members shall be maintained on site at all times\*. The fire brigade shall not include the Shift Superintendent, the Shift Technical Advisor, nor the two other members of the minimum shift crew necessary for safe shutdown of the unit and any personnel required for other essential functions during a fire emergency; and

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\*The Health Physics Technician and fire brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required positions.

## ADMINISTRATIVE CONTROLS

### UNIT STAFF (continued)

- f. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions (e.g., licensed Senior Operators, licensed Operators, health physicists, auxiliary operators, and key maintenance personnel).

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the unit is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shut-down for refueling, major maintenance, or major unit modifications, on a temporary basis the following guidelines shall be followed:

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
2. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time.
3. A break of at least 8 hours should be allowed between work periods, including shift turnover time.
4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the Plant Manager or the Superintendent Operations, (for operating personnel) or the Superintendent-Maintenance/Instrumentation and Controls (for key maintenance and instrument and control personnel), or the Superintendent-Plant Services (for chemistry and health physics personnel) or the Superintendent-Technical (for technical personnel), or the Superintendent-Modifications (for construction personnel) or their designee or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Plant Manager, or the appropriate superintendents or their designees to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

# PHILADELPHIA ELECTRIC COMPANY NUCLEAR MANAGEMENT ORGANIZATION CHART

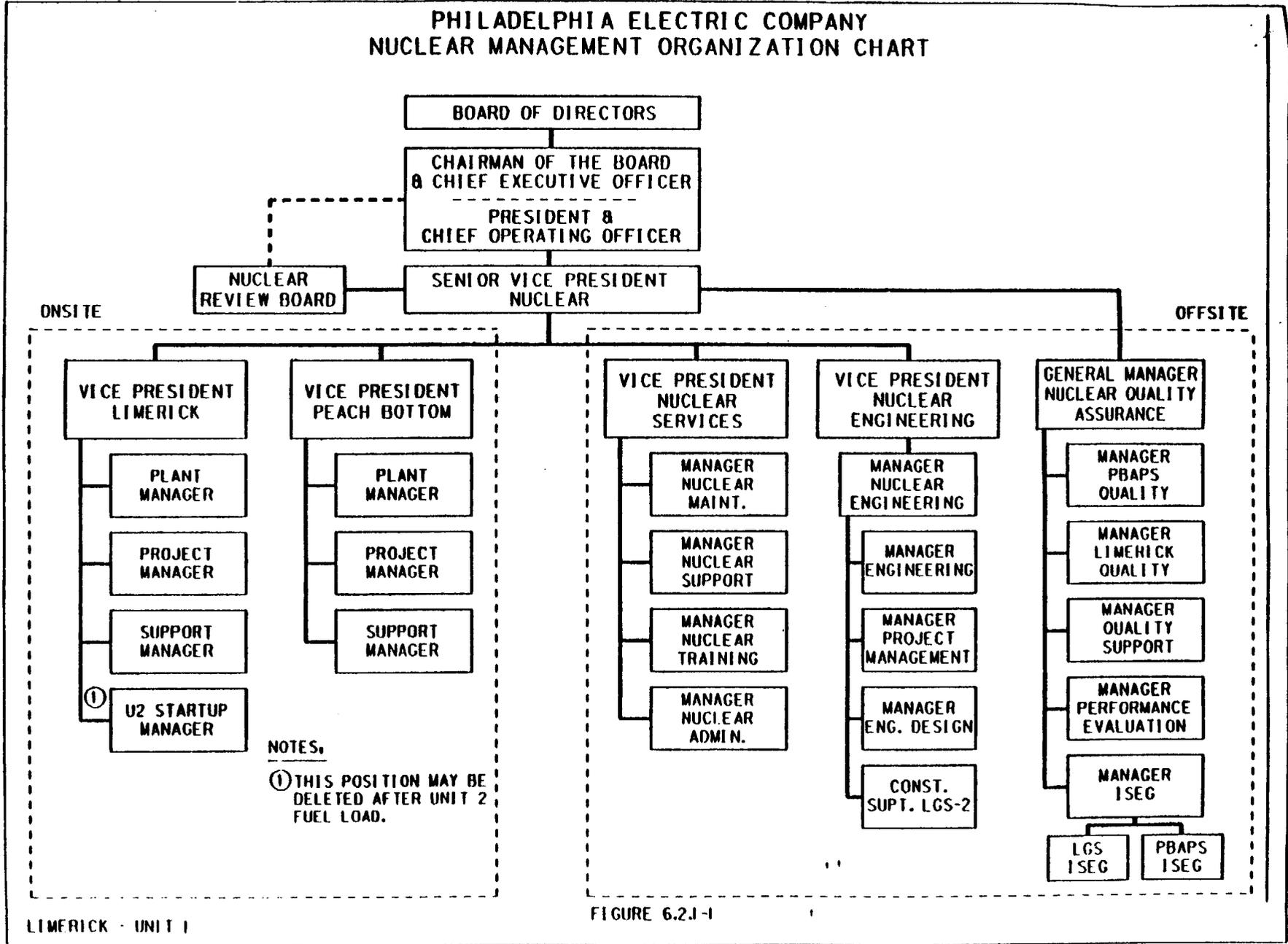
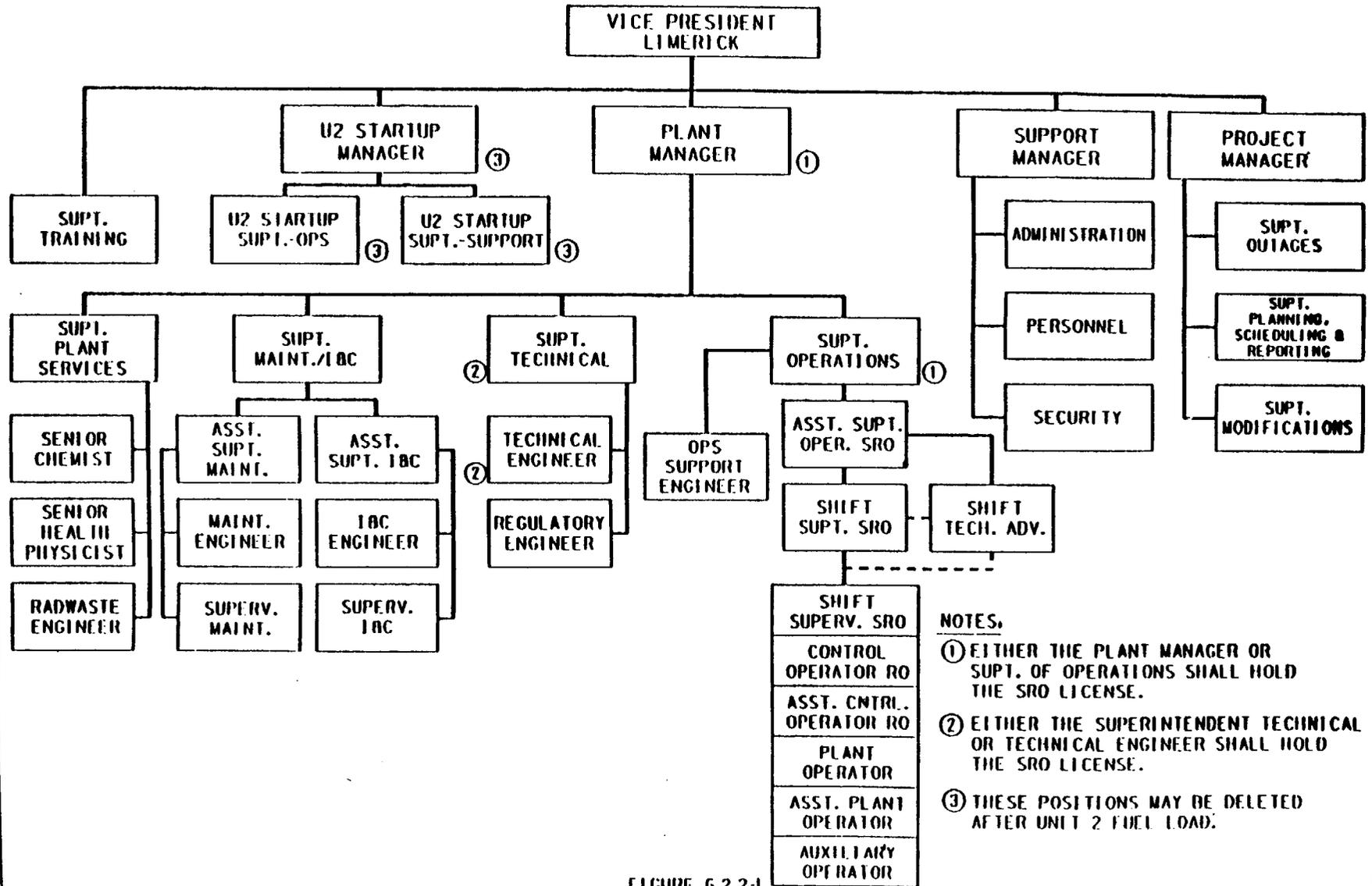


FIGURE 6.2J-1

LIMERICK - UNIT 1

## ORGANIZATION FOR CONDUCT OF PLANT OPERATIONS LIMERICK GENERATING STATION



- NOTES:**
- ① EITHER THE PLANT MANAGER OR SUPT. OF OPERATIONS SHALL HOLD THE SRO LICENSE.
  - ② EITHER THE SUPERINTENDENT TECHNICAL OR TECHNICAL ENGINEER SHALL HOLD THE SRO LICENSE.
  - ③ THESE POSITIONS MAY BE DELETED AFTER UNIT 2 FUEL LOAD.

FIGURE 6.2.2-1  
ORGANIZATION FOR CONDUCT OF PLANT OPERATIONS

TABLE 6.2.2-1  
MINIMUM SHIFT CREW COMPOSITION  
TWO UNITS WITH A COMMON CONTROL ROOM

WITH UNIT (2) IN CONDITION 4 OR 5 OR DEFUELED		
POSITION	NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION	
	CONDITION 1, 2, or 3	CONDITION 4 or 5
SS	1*	1*
SRO	1	1*
RO	2	1
NLO	2	2**
STA	1	None

WITH UNIT (2) IN CONDITION 1, 2, OR 3		
POSITION	NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION	
	CONDITION 1, 2, or 3	CONDITION 4 or 5
SS	1*	1*
SRO	1*	1*
RO	2**	1
NLO	2**	1
STA	1*	None

TABLE NOTATIONS

- \*Individual may fill the same position on Unit 2.
- \*\*One of the two required individuals may fill the same position on Unit 2.
- SS - Shift Superintendent or Shift Supervisor with a Senior Operator license on Unit 1.
- SRO - Individual with a Senior Operator license on Unit 1.
- RO - Individual with an Operator license on Unit 1.
- NLO - Non-licensed operator properly qualified to support the unit to which assigned.
- STA - Shift Technical Advisor

Except for Shift Supervision (SS), the shift crew composition may be one less than the minimum requirements of Table 6.2.2-1 for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 6.2.2-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent.

During any absence of Shift Supervision (SS) from the control room while the unit is in OPERATIONAL CONDITION 1, 2, or 3, an individual (other than the Shift Technical Advisor) with a valid Senior Operator license shall be designated to assume the control room command function. During any absence of Shift Supervision from the control room while the unit is in OPERATIONAL CONDITION 4 or 5, an individual with a valid Senior Operator license or Operator license shall be designated to assume the control room command function.

## ADMINISTRATIVE CONTROLS

### 6.2.3 INDEPENDENT SAFETY ENGINEERING GROUP (ISEG)

#### FUNCTION

6.2.3.1 The ISEG shall function to examine unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of unit design and operating experience information, including units of similar design, which may indicate areas for improving unit safety. The ISEG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities, or other means of improving unit safety. Such recommendations shall be submitted through the General Manager-Nuclear Quality Assurance to the Senior Vice President-Nuclear.

#### COMPOSITION

6.2.3.2 The Limerick ISEG shall be composed of at least three, dedicated, full-time engineers, including the ISEG Supervisor, located onsite. Each shall have a bachelor's degree in engineering or related science and at least two years professional level experience in his or her field. The Limerick ISEG Supervisor shall have at least six years of experience in the nuclear field. The corporate ISEG shall be composed of two dedicated full time engineers each with a Bachelors degree in engineering or related science and at least 2 years professional level experience in his or her field, at least 1 year of which experience shall be in the nuclear field. The LGS ISEG reports to the Independent Safety Engineering Manager.

#### RESPONSIBILITIES

6.2.3.3 The ISEG shall be responsible for maintaining surveillance of unit activities to provide independent verification\* that these activities are performed correctly and that human errors are reduced as much as practical.

#### RECORDS

6.2.3.4 Records of activities performed by the ISEG shall be prepared, maintained, and forwarded each calendar month to the Independent Safety Engineering Manager.

### 6.2.4 SHIFT TECHNICAL ADVISOR

6.2.4.1 The Shift Technical Advisor shall provide advisory technical support to Shift Supervision in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to safe operation of the unit. The Shift Technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline and shall have received specific training in the response and analysis of the unit for transients and accidents, and in unit design and layout, including the capabilities of instrumentation and controls in the control room.

### 6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 for comparable positions, except for the Senior Health Physicist who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975. The licensed Operators and Senior Operators shall also meet or exceed the minimum qualifications of the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees.

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\*Not responsible for sign-off function.

## ADMINISTRATIVE CONTROLS

### 6.4 TRAINING

6.4.1 A retraining and replacement training program for the unit staff shall be maintained under the direction of the site Training organization and shall meet or exceed the requirements of ANSI/ANS 3.1-1978 and Appendix A of 10 CFR Part 55 and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees, and shall include familiarization with relevant industry operational experience.

### 6.5 REVIEW AND AUDIT

#### 6.5.1 PLANT OPERATIONS REVIEW COMMITTEE (PORC)

##### FUNCTION

6.5.1.1 The PORC shall function to advise the Plant Manager on all matters related to nuclear safety.

##### COMPOSITION

6.5.1.2 The PORC shall be composed of the:

Chairman:	Superintendent-Operations
Member:	Superintendent-Technical
Member:	Superintendent-Maintenance/Instrumentation and Controls
Member:	Superintendent-Plant Services
Member:	Assistant Superintendent-Operations
Member:	Regulatory Engineer
Member:	Technical Engineer
Member:	Shift Superintendent
Member:	Maintenance Engineer

##### ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the PORC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in PORC activities at any one time.

##### 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.

##### QUORUM

6.5.1.5 The quorum of the PORC necessary for the performance of the PORC responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate and four members including alternates.

## ADMINISTRATIVE CONTROLS

### RESPONSIBILITIES

6.5.1.6 The PORC shall be responsible for:

- a. Review of (1) all procedures required by Specification 6.8 and changes thereto, (2) all programs required by Specification 6.8 and changes thereto, and (3) any other procedures or changes thereto as determined by the Plant Manager to affect nuclear safety;
- b. Review of all proposed tests and experiments that affect nuclear safety;
- c. Review of all proposed changes to Appendix A Technical Specifications;
- d. Review of all proposed changes or modifications to unit systems or equipment that affect nuclear safety;
- e. Review of the safety evaluations for procedures and changes thereto completed under the provisions of 10 CFR 50.59.
- f. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, to the Vice President, Limerick Generating Station, Plant Manager, and to the Nuclear Review Board;
- g. Review of all REPORTABLE EVENTS;
- h. Review of unit operations to detect potential hazards to nuclear safety;
- i. Performance of special reviews, investigations, or analyses and reports thereon as requested by the Vice President, Limerick Generating Station, Plant Manager or the Chairman of the Nuclear Review Board;
- j. Review of the Security Plan and implementing procedures and submittal of recommended changes to the Nuclear Review Board; and
- k. Review of the Emergency Plan and implementing procedures and submittal of the recommended changes to the Nuclear Review Board.
- l. Review of every unplanned onsite release of radioactive material to the environs including the preparation and forwarding of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence to the Vice President, Limerick Generating Station, Plant Manager, and to the Nuclear Review Board.
- m. Review of changes to the PROCESS CONTROL PROGRAM, OFFSITE DOSE CALCULATION MANUAL, and radwaste treatment systems.

6.5.1.7 The PORC shall:

- a. Recommend in writing to the Plant Manager approval or disapproval of items considered under Specification 6.5.1.6a. through d. prior to their implementation.
- b. Render determinations in writing with regard to whether or not each item considered under Specification 6.5.1.6a. through f. constitutes an unreviewed safety question.

## ADMINISTRATIVE CONTROLS

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### RESPONSIBILITIES (Continued)

- c. Provide written notification within 24 hours to the Vice President, Limerick Generating Station 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 Specification 6.1.1.

### RECORDS

6.5.1.8 The PORC shall maintain written minutes of each PORC meeting that, at a minimum, document the results of all PORC activities performed under the responsibility provisions of these Technical Specifications. Copies shall be provided to the Vice President, Limerick Generating Station, Plant Manager, and the Nuclear Review Board.

### 6.5.2 NUCLEAR REVIEW BOARD (NRB)

#### FUNCTION

6.5.2.1 The NRB shall function to provide independent review and audit of designated activities in the areas of:

- a. Nuclear power plant operations,
- b. Nuclear engineering,
- c. Chemistry and radiochemistry,
- d. Metallurgy,
- e. Instrumentation and control,
- f. Radiological safety,
- g. Mechanical and electrical engineering, and
- h. Quality assurance practices.

The NRB shall report to and advise the Senior Vice President - Nuclear and the Office of the Chief Executive on those areas of responsibility in Specifications 6.5.2.7 and 6.5.2.8.

#### COMPOSITION

6.5.2.2 The Chairman, members, and alternates of the NRB shall be appointed in writing by the Senior Vice President - Nuclear, and shall have an academic degree in an engineering or physical science field; and in addition, shall have a minimum of 5 years technical experience, of which a minimum of 3 years shall be in one or more areas given in Specification 6.5.2.1. The NRB shall be composed of no less than eight and no more than 12 members.

The members and alternates of the NRB will be competent in the area of Quality Assurance practice and cognizant of the Quality Assurance requirements of 10 CFR Part 50, Appendix B. Additionally, they will be cognizant of the corporate Quality Assurance Program and will have the corporate Quality Assurance organization available to them.

## ADMINISTRATIVE CONTROLS

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### ALTERNATES

6.5.2.3 All alternates shall be appointed in writing by the NRB Chairman to serve on a continuing basis. They shall receive correspondence sent to NRB members with regard to NRB activities and shall be invited to attend all NRB meetings. Alternates shall vote only in the absence of those members for whom they are the alternate.

### CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the NRB Chairman to provide expert advice to the NRB.

### MEETING FREQUENCY

6.5.2.5 The NRB shall meet at least once per calendar quarter during the initial year of unit operation following fuel loading and at least once per 6 months thereafter.

### QUORUM

6.5.2.6 The quorum of the NRB necessary for the performance of the NRB review and audit functions of these Technical Specifications shall consist of the Chairman or a designated alternate and at least four but not less than one half of the voting NRB members. No more than a minority of the quorum shall have line responsibility for operation of the facility.

### REVIEW

6.5.2.7 The NRB shall review:

- a. The safety evaluations for (1) changes to procedures, equipment, facilities or systems; and (2) tests or experiments completed under the provision of 10 CFR 50.59 to verify that such actions did not constitute an unreviewed safety question;
- b. Proposed changes to procedures, equipment, or systems which involve an unreviewed safety question as defined in 10 CFR 50.59;
- c. Proposed tests or experiments which involve an unreviewed safety question as defined in 10 CFR 50.59;
- d. Proposed changes to Technical Specifications or this Operating License;
- e. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance;
- f. Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety;
- g. All REPORTABLE EVENTS;

## ADMINISTRATIVE CONTROLS

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### REVIEW (Continued)

- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety; and
- i. Reports and meeting minutes of the PORC.

### AUDITS

6.5.2.8 Audits of unit activities shall be performed under the cognizance of the NRB. These audits shall encompass:

- a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months;
- b. The performance, training and qualifications of the entire unit staff at least once per 12 months;
- c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems, or method of operation that affect nuclear safety, at least once per 6 months;
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix B, 10 CFR Part 50, at least once per 24 months;
- e. The Emergency Plan and implementing procedures at least once per 12 months.
- f. The Security Plan and implementing procedures at least once per 12 months.
- g. Any other area of unit operation considered appropriate by the NRB or the Senior Vice President - Nuclear.
- h. The Fire Protection Program and implementing procedures at least once per 24 months.
- i. An independent fire protection and loss prevention inspection and audit shall be performed at least once per 12 months utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- j. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 36 months.

## ADMINISTRATIVE CONTROLS

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### AUDITS (Continued)

- k. The radiological environmental monitoring program and the results thereof at least once per 12 months.
- l. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months.
- m. The PROCESS CONTROL PROGRAM and implementing procedures at least once per 24 months.
- n. The performance of activities required by the Quality Assurance Program to meet the criteria of Regulatory Guide 4.15, December, 1977, at least once per 12 months.

### RECORDS

6.5.2.9 Records of NRB activities shall be prepared, approved, and distributed as indicated below:

- a. Minutes of each NRB meeting shall be prepared, approved, and forwarded to the Senior Vice President - Nuclear within 14 days following each meeting.
- b. Reports of reviews encompassed by Specification 6.5.2.7 shall be prepared, approved, and forwarded to the Senior Vice President - Nuclear within 14 days following completion of the review.
- c. Audit reports encompassed by Specification 6.5.2.8 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 by the auditing organization.

### 6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the PORC and submitted to the NRB, Plant Manager and the Vice President, Limerick Generating 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 NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Vice President, Limerick Generating Station, Plant Manager, and the NRB shall be notified within 24 hours.

## ADMINISTRATIVE CONTROLS

### SAFETY LIMIT VIOLATION (Continued)

- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the NRB. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon unit components, systems, or structures, and (3) corrective action taken to prevent recurrence.
- c. The Safety Limit Violation Report shall be submitted to the Commission, the NRB, Plant Manager, and the Vice President, Limerick Generating Station, within 14 days of the violation.
- d. Critical operation of the unit shall not be resumed until authorized by the Commission.

### 6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented, and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.
- b. The applicable procedures required to implement the requirements of NUREG-0737 and Supplement 1 to NUREG-0737.
- c. Refueling operations.
- d. Surveillance and test activities of safety-related equipment.
- e. Security Plan implementation.
- f. Emergency Plan implementation.
- g. Fire Protection Program implementation.
- h. PROCESS CONTROL PROGRAM implementation.
- i. OFFSITE DOSE CALCULATION MANUAL implementation.
- j. Quality Assurance Program for effluent and environmental monitoring, using the guidance of Regulatory Guide 4.15, February 1979.

6.8.2 Each procedure of Specification 6.8.1, and changes thereto, shall be reviewed in accordance with Specification 6.5.1.6 and shall be approved by the Plant Manager or designee prior to implementation and reviewed periodically as set forth in administrative procedures.

6.8.3 Temporary changes to procedures of Specification 6.8.1 may be made provided:

- a. The intent of the original procedure is not altered;
- b. The change is approved by two members of the unit management staff, at least one of whom holds a Senior Operator license on the unit affected; and
- c. The change is documented, reviewed by the PORC, and approved by the Plant Manager or designee within 14 days of implementation.

## ADMINISTRATIVE CONTROLS

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### PROCEDURES AND PROGRAMS (Continued)

6.8.4 The following programs shall be established, implemented, and maintained:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the core spray, high pressure coolant injection, reactor core isolation cooling, residual heat removal, post-accident sampling system, safeguard piping fill system, control rod drive scram discharge system, and containment air monitor systems. The program shall include the following:

1. Preventive maintenance and periodic visual inspection requirements, and
2. Integrated leak test requirements for each system at refueling cycle intervals or less.

b. In-Plant Radiation Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

1. Training of personnel,
2. Procedures for monitoring, and
3. Provisions for maintenance of sampling and analysis equipment.

c. Post-accident Sampling\*

A program which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

1. Training of personnel,
2. Procedures for sampling and analysis, and
3. Provisions for maintenance of sampling and analysis equipment.

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\*Not required until prior to exceeding 5% of RATED THERMAL POWER.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 10 TO FACILITY OPERATING LICENSE NO. NPF-39

PHILADELPHIA ELECTRIC COMPANY

LIMERICK GENERATING STATION, UNIT 1

DOCKET NO. 50-352

1.0 INTRODUCTION

By letter dated November 18, 1987, Philadelphia Electric Company, (PECo or the licensee) requested an amendment to Facility Operating License No. NPF-39 for the Limerick Generating Station, Unit 1. The proposed amendment would modify Section 6 of the facility Technical Specifications to reflect (I) a new corporate and (II) a new plant staff organizational structure, and (III) a revised composition of the Plant Operations Review Committee. By letter dated November 19, 1987 the licensee also submitted a similar application for the Peach Bottom Atomic Power Station, Unit Nos. 2 and 3, which it also operates. The latter application was approved by the Commission on June 22, 1988 (Amendment Nos. 132 and 135 to Facility Operating License Nos. DPR-44 and DPR-56).

2.0 EVALUATION

I. Offsite Management and Support Organization, Figure 6.2.1-1

PECo has established, within the corporate structure, a dedicated nuclear organization with direct management authority and responsibility over all aspects of nuclear operations, engineering, maintenance, and construction. The new nuclear organization will be headed by an Executive Vice President-Nuclear with nuclear responsibilities only. This organization has been formed by separating nuclear engineering, maintenance and other nuclear operations support activities from corresponding fossil and hydro production support activities and reassigning these resources to the newly established dedicated nuclear organization. The positions of Senior Vice President-Nuclear Power, Nuclear Production Manager, Superintendent-Nuclear Generation Division, Superintendent-Nuclear Services, and Manager-Nuclear Plant have been abolished and the functions under these positions have been reassigned within the new organization under the Executive Vice President-Nuclear. Revision I of the Plan for Restart included a change in the title of the senior nuclear executive to Executive Vice President-Nuclear. The new organization is shown in revised Technical Specification (TS) Figure 6.2.1-1. Reporting to the Executive Vice President-Nuclear are the Senior Vice President-Nuclear, Vice President-Nuclear Services, Vice President-Nuclear Engineering, General

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Manager-Nuclear Quality Assurance, Vice President-Limerick and Vice President-Peach Bottom. In addition, the Nuclear Review Board (NRB) reports directly to the Executive Vice President-Nuclear.

The new office of Vice President-Nuclear Services has responsibility for nuclear service activities that support the station. Reporting to the Vice President-Nuclear Services are the Manager-Nuclear Support, Manager-Nuclear Maintenance, Manager-Nuclear Training, and Manager-Nuclear Administration. The Manager-Nuclear Support is responsible for licensing, fuel management, radiation protection, radioactive waste management, nuclear plant chemistry, emergency preparedness, nuclear plant security and the Operating Experience Assessment program.

The Manager-Nuclear Maintenance is responsible for the supplemental craft maintenance support which serves the maintenance organization at the nuclear facilities. These activities include mobile mechanical maintenance, mobile electrical maintenance, and centralized maintenance services.

The Manager-Nuclear Training is responsible for two branches: the Nuclear Training Section, which has the responsibility for licensed, accredited and general employee training; and the Barbados Training Center, responsible for crafts training for maintenance and construction workers.

The Manager-Nuclear Administration is responsible for coordinating and monitoring activities that support the nuclear organization, including personnel administration, budget and cost control, computer applications, and nuclear records management.

The new office of Vice President-Nuclear Engineering is responsible for management of engineering activities that support the nuclear facilities. Reporting to the Vice President-Nuclear Engineering through the Manager-Nuclear Engineering are the Manager-Engineering, Manager-Project Management, Manager-Engineering Design and the Construction Superintendent, Limerick Generating Station, Unit 2.

The Manager, Engineering is responsible for engineering designs, analyses, studies, assistance and expertise, as required, to support the safe and effective operations of the Company's nuclear units.

The Manager, Project Management is responsible for the management of Engineering projects for each station to ensure that all engineering work is defined, planned, scheduled, budgeted, implemented, technically supported and evaluated in a timely and cost effective manner. The Manager, Projects interfaces with each station's Project Manager to coordinate the station implementation of engineering projects.

The Manager, Engineering Design is responsible for providing conceptual design support, engineering design, and drafting services to support the development and implementation of nuclear plant modifications.

The Construction Superintendent, Limerick Generating Station (LGS) Unit 2 is responsible for planning, scheduling, coordinating, directing and controlling the safety, quality, timeliness and cost effectiveness of all work associated with LGS Unit 2 until fuel loading.

The office of General Manager-Nuclear Quality Assurance (NQA) will be responsible for maintaining an effective Nuclear Quality Assurance Program. Reporting to the General Manager-Nuclear Quality Assurance are the Manager-Peach Bottom Atomic Power Station Quality, Manager-Limerick Quality, Manager-Quality Support, Manager-Performance Assessment and Manager-Independent Safety Engineering Group.

The quality control and quality assurance practices of each site are under the direction of the respective site Managers-Quality. The Quality Support Manager will be responsible for quality activities common to both sites. This includes manuals and procedures, vendor audits and surveillance, training, procurement controls, and oversight of Quality activities of Nuclear Engineering and Nuclear Services.

The Performance Assessment Manager will be responsible for ensuring that appropriate performance measurement programs are in place to monitor organizational performance and to provide independent assessment of the effectiveness of the other nuclear organizations.

The Independent Safety Engineering Group (ISEG) Manager is responsible for the examination of plant operating characteristics, NRC correspondence and reports, and other appropriate sources of plant design and operating experience information that may indicate potential areas for improving plant safety. The Manager-ISEG reports to the Executive Vice President-Nuclear through the General Manager-NQA.

The staff reviewed the reporting relationship of the ISEG to the corporate organization with respect to whether adequate paths are provided by the organizational structure for identification of ISEG conclusions to the appropriate corporate management and with respect to whether the ISEG has sufficient independence from the corporate QA functional organization. An assessment of the purposes of the five groups in NQA indicates that three of the groups, PBAPS Quality, LGS Quality and Quality Support Perform functions related to ensuring compliance with regulatory requirements including 10 CFR Part 50, Appendix B. The other two groups, ISEG and Performance Assessment, provide independent assessments and oversight of operations. The NQA organization has thus been expanded beyond being concerned only with classical quality assurance activities. The staff concludes that these aspects of the organizational structure, which include: (a) the independence of the ISEG from the classical quality assurance groups under the General Manager-NQA, (b) the Manager, ISEG reporting to the General Manager-NQA, and (c) the General Manager-NQA's roles as a member of the senior management team reporting directly to the Executive Vice-President-Nuclear and as a member of the NRB, are

consistent with the staff's guidance regarding the reporting of ISEG activities to a high level corporate official located offsite who is not in the power production management chain.

The Nuclear Review Board (NRB) is responsible for providing independent review and audit of technical and managerial areas. Its composition is being revised to include outside nuclear executives.

We have reviewed the requested changes and found them acceptable as they meet the acceptance criteria of the appropriate parts of Section 13.1.1 of NUREG-0800, the Standard Review Plan.

## II. Onsite Management Organization, TS Figure 6.2.2-1

PECo has established a new office of Vice President-Limerick Generating Station which will have overall control for the conduct of activities of all organizations at the Limerick site. The Vice President-Limerick is located at the Limerick site. PECO has reassigned previous functions and added new functions under a Plant Manager, Support Manager, Project Manager, Unit 2 Startup Manager and Superintendent-Training, who all report directly to the Vice President-Limerick.

The Plant Manager will be responsible for operating the plant safely, reliably, and efficiently in accordance with all applicable requirements. Reporting to the Plant Manager are the Superintendent Plant Services, Superintendent-Maintenance/Instrumentation and Controls, Superintendent Technical, and Superintendent Operations.

The Support Manager will be responsible for procedures, records management, budget, cost control and ensuring the effectiveness of the site security program. Reporting to the Support Manager will be the Administrative, Personnel and Security staffs.

The Project Manager will be responsible for outage, modification, and planning activities. Reporting to the Project Manager will be a Superintendent-Outages, Superintendent-Planning, Scheduling, and Reporting, and a Superintendent-Modifications.

The Superintendent-Training will be responsible to identify the programmatic training needs of site personnel, to ensure the effectiveness of training programs, and to incorporate operating experience into training and to monitor participation.

The Superintendent Plant Services will be responsible for management of chemistry, health physics, and radwaste activities. Reporting to the Superintendent will be the Senior Chemist, Senior Health Physicist, and the Radwaste Engineer.

The Superintendent-Maintenance/Instrumentation and Controls will be responsible for the coordination of all maintenance and instrumentation

and controls activities. Reporting to the Superintendent-Maintenance/Instrumentation and Controls will be the Assistant Superintendent-Instrumentation and Controls, and the Assistant Superintendent-Maintenance.

The Superintendent-Technical will be responsible for technical support groups, including regulatory matters. Reporting to the Superintendent-Technical will be a Technical Engineer responsible for modifications testing, reactor engineering and plant performance, and the process computer; and a Regulatory Engineer responsible for regulatory and INPO interfaces, the LER program and commitment tracking.

The Superintendent-Operations will be responsible for management oversight of shift operations. Reporting directly to the Superintendent-Operations are an Assistant Superintendent-Operations and an Operations Support Engineer. Reporting to the Assistant Superintendent-Operations are the six Shift Superintendents and the six Shift Technical Advisors. The Shift Superintendents manage the operations of the plant on their assigned shifts.

Either the Plant Manager or the Superintendent of Operations shall hold an SRO license. The present Superintendent has an SRO license and the new Plant Manager has completed the Limerick Station SRO Certification Program and the INPO Senior Nuclear Plant Managers Program. The Assistant Superintendent-Operations and the Shift Superintendents are required to have SRO licenses. Although not required, the Operations Support Engineer also holds an SRO license.

PECo has also made numerous revisions to Section 6 to reflect title changes in the revised organization along with minor editorial changes. Title changes have been made in Sections 6.1, 6.2.2, 6.2.3, 6.4, 6.5, 6.6, 6.7 and 6.8 to reflect the new titles.

We have reviewed the requested changes and found them acceptable as they meet the acceptance criteria of the appropriate parts of Section 13.1.2-13.1.3 of NUREG-0800.

### III. Plant Operations Review Committee (PORC), Section 6.5.1

PECo has revised the composition of the PORC because of the revised plant organization. The revised PORC membership is the Superintendent-Operations as Chairman, Superintendent-Technical, Superintendent-Maintenance/Instrumentation and Controls, Superintendent-Plant Services, Assistant Superintendent-Operations, Maintenance Engineer, Technical Engineer, Regulatory Engineer and a Shift Superintendent.

In addition, the name of the committee has been changed from Plant Operation Review Committee to Plant Operations Review Committee.

We have reviewed these changes and find them acceptable as they meet the acceptance criteria of the appropriate part of Section 13.4 of NUREG-0800, the Standard Review Plan.

### 3.0 ENVIRONMENTAL CONSIDERATION

These amendments involve a change to 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 nor environmental assessment need be prepared in connection with the issuance of the amendments.

### 4.0 CONCLUSION

The Commission has made a proposed determination that the amendment involves no significant hazards consideration which was published in the Federal Register (52 FR 48589) on December 23, 1987 and consulted with the State of Pennsylvania. No public comments were received and the State of Pennsylvania did not have any comments.

The staff 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, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and the security nor to the health and safety of the public.

Principal Contributor: R. J. Clark

Dated: October 31, 1988