

August 5, 1992

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: LICENSED OPERATOR QUALIFICATIONS AND TRAINING, LIMERICK  
GENERATING STATION, UNITS 1 AND 2 (TSCR NO. 91-01-0) (TAC NOS.  
M83563 AND M83564)

The Commission has issued the enclosed Amendment No. 55 to Facility Operating License No. NPF-39 and Amendment No. 20 to Facility Operating License No. NPF-85 for the Limerick Generating Station, Units 1 and 2. These amendments consist of changes to the Technical Specifications (TSs) in response to your application dated May 19, 1992.

These amendments change Sections 6.3.1 and 6.4.1 of the TSs to clarify the current requirements for licensed operator qualifications and training.

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, Senior Project Manager  
Project Directorate I-2  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 55 to  
License No. NPF-39  
Amendment No. 20 to  
License No. NPF-85
2. Safety Evaluation

cc w/enclosures:  
See next page

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Docket File	MO'Brien(2)	CGrimes, 11E21	BRuland, RGN-I
NRC & Local PDRs	RClark/JShea	RPelton, 10D-24	
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SVarga	DHagan, 3206	OPA	
JCalvo	GHill(4), P1-22	OC/LFMB	
CMiller	Wanda Jones, 7103	EWenzinger, RGN-I	

\*Previously Concurred

OFFICE	PDI-2/LA	PDI-2/PM	LHFB*	LHFB/C*	OGC	PDI-2/D
NAME	MO'Brien	RClark:rb	RPelton	JWermiel	CPW	CMC
DATE	7/23/92	07/23/92	07/17/92	07/17/92	7/24/92	8/4/92

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DOCUMENT NAME: LI83563.AMD

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

August 5, 1992

Docket Nos. 50-352  
and 50-353

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: LICENSED OPERATOR QUALIFICATIONS AND TRAINING, LIMERICK  
GENERATING STATION, UNITS 1 AND 2 (TSCR NO. 91-01-0) (TAC NOS.  
M83563 AND M83564)

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

Sincerely,

A handwritten signature in cursive script, reading "Richard J. Clark", is written over a horizontal line.

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

Enclosures:

1. Amendment No. 55 to  
License No. NPF-39  
Amendment No. 20 to  
License No. NPF-85
2. Safety Evaluation

cc w/enclosures:  
See next page

Mr. George J. Beck  
Philadelphia Electric Company

Limerick Generating Station,  
Units 1 & 2

cc:

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Sr. V.P. & General Counsel  
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Mr. Richard W. Dubiel  
Superintendent - Services  
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Sanatoga, Pennsylvania 19464



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. 55  
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 May 19, 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 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. 55, are hereby incorporated into this license. Philadelphia Electric Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

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  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the  
Technical Specifications

Date of Issuance: August 5, 1992

ATTACHMENT TO LICENSE AMENDMENT NO. 55

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.\*

Remove

6-5  
6-6

6-7  
6-8

Insert

6-5\*  
6-6

6-7  
6-8\*

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.

### 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 Executive Vice President-Nuclear.

#### COMPOSITION

6.2.3.2 The Limerick ISEG shall be composed of at least five, dedicated, full-time engineers, including the ISEG Superintendent, 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 Superintendent shall have at least six years of experience in the nuclear field. The LGS ISEG reports to the General Manager-Nuclear Quality Assurance.

#### 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 General Manager-Nuclear Quality Assurance.

### 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 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, and the licensed operators who shall comply with the requirements of 10CFR55.

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\*Not responsible for sign-off function.



#### 6.4 TRAINING

6.4.1 Training programs for the unit staff shall be maintained under the direction of the site training organization. The retraining and replacement training programs for all affected positions except licensed operators shall meet or exceed the standards of ANSI/ANS 3.1-1978. The retraining and replacement training programs for licensed operators shall comply with the requirements of 10 CFR 55, 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.

RESPONSIBILITIES

## 6.5.1.6 The PORC shall be responsible for:

- a. Review of (1) Administrative Procedures and changes thereto, (2) new programs or procedures required by Specification 6.8 and requiring a 10 CFR 50.59 safety evaluation, and (3) proposed changes to programs or procedures required by Specification 6.8 and 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 Appendix A Technical Specifications;
- d. Review of all proposed changes or modifications to unit systems or equipment that affect nuclear safety;
- e. DELETED.
- 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 6.5.1.6b. through f. constitutes an unreviewed safety question.



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

PHILADELPHIA ELECTRIC COMPANY

DOCKET NO. 50-353

LIMERICK GENERATING STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 20  
License No. NPF-85

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Philadelphia Electric Company (the licensee) dated May 19, 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 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.

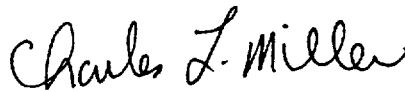
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-85 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 20, are hereby incorporated into this license. Philadelphia Electric Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

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

FOR THE NUCLEAR REGULATORY COMMISSION



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

Attachment:  
Changes to the  
Technical Specifications

Date of Issuance: August 5, 1992

ATTACHMENT TO LICENSE AMENDMENT NO. 20

FACILITY OPERATING LICENSE NO. NPF-85

DOCKET NO. 50-353

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.\*

Remove

6-5  
6-6

6-7  
6-8

Insert

6-5\*  
6-6

6-7  
6-8\*

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MINIMUM SHIFT CREW COMPOSITION  
TWO UNITS WITH A COMMON CONTROL ROOM

WITH UNIT 1 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 1 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 1.  
 \*\*One of the two required individuals may fill the same position on Unit 1.  
 SS - Shift Superintendent or Shift Supervisor with a Senior Operator license on Unit 2.  
 SRO - Individual with a Senior Operator license on Unit 2.  
 RO - Individual with an Operator license on Unit 2.  
 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.

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#### FUNCTION

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#### COMPOSITION

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#### 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.

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### 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.

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\*Not responsible for sign-off function.

## 6.4 TRAINING

6.4.1 Training programs for the unit staff shall be maintained under the direction of the site training organization. The retraining and replacement training programs for all affected positions except licensed operators shall meet or exceed the standards of ANSI/ANS 3.1-1978. The retraining and replacement training programs for licensed operators shall comply with the requirements of 10 CFR 55, 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.



## RESPONSIBILITIES

### 6.5.1.6 The PORC shall be responsible for:

- a. Review of (1) Administrative Procedures and changes thereto, (2) new programs or procedures required by Specification 6.8 and requiring a 10 CFR 50.59 safety evaluation, and (3) proposed changes to programs or procedures required by Specification 6.8 and 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 Appendix A Technical Specifications;
- d. Review of all proposed changes or modifications to unit systems or equipment that affect nuclear safety;
- e. DELETED.
- 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.
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### 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 6.5.1.6b. through f. constitutes an unreviewed safety question.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 55 AND 20 TO FACILITY OPERATING

LICENSE NOS. NPF-39 AND NPF-85

PHILADELPHIA ELECTRIC COMPANY

LIMERICK GENERATING STATION, UNITS 1 AND 2

DOCKET NOS. 50-352 AND 50-353

1.0 INTRODUCTION

By letter dated May 19, 1992, the Philadelphia Electric Company (PECo or the licensee) submitted a request for changes to the Limerick Generating Station, Units 1 and 2, Technical Specifications (TS). The requested changes would revise Sections 6.3.1 and 6.4.1 of the TS to clarify the current requirements for licensed operator qualifications and training. These changes are being proposed to delete TS requirements that are superseded based on the licensed operator training programs being accredited and based on a "systems approach to training," and promulgation of the revised 10 CFR Part 55, "Operators' Licenses," which became effective on May 26, 1987.

2.0 EVALUATION

On March 20, 1985, the NRC issued "Commission Policy Statement on Training and Qualification of Nuclear Power Plant Personnel" (50 FR 11147) which endorsed the training accreditation program developed by the Institute of Nuclear Power Operations (INPO), in association with its National Academy for Nuclear Training. Subsequently, NRC Generic Letter (GL) No. 87-07, "Information Transmittal of Final Rulemaking for Revisions to Operator Licensing - 10 CFR 55 and Conforming Amendments," dated March 19, 1987, and NUREG-1262, "Answers to Questions at Public Meetings Regarding Implementation of Title 10, Code of Federal Regulations, Part 55 on Operators' Licenses," published November 1987, indicated that the NRC will accept a licensee's licensed operator training program if it is certified to be accredited and based on a "systems approach to training," and that this accreditation obviates the need to conform to Regulatory Guide (RG) 1.8, "Qualification and Training of Personnel for Nuclear Power Plants," Revision 2, dated April 1987, and Standard ANSI/ANS 3.1, "Selection, Qualification and Training of Personnel for Nuclear Power Plants." PECo, by letters dated April 27, 1990, and June 19, 1990, in response to GL 87-07, certified that the licensed operator training programs for Limerick Generating Station (LGS), Units 1 and 2, were initially accredited by INPO on October 30, 1986, and then again on January 25, 1990, and that these programs are based on a systems approach to training.

TS Section 6.3.1, "Unit Staff Qualifications," for LGS, Units 1 and 2, currently states "Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978...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." Additionally, TS Section 6.4.1 "Training," for LGS, Units 1 and 2, currently states, "A retraining and replacement training program...shall meet or exceed the requirements of ANSI/ANS 3.1-1978 and 10 CFR 55 and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees..." Licensed operator qualifications and the licensed operator retraining and replacement training programs must comply with the requirements of the revised 10 CFR 55, which, as stated in NUREG-1262, supersedes the supplemental requirements specified in the March 28, 1980 NRC letter to all licensees. Also NUREG-1262 indicates that Standard ANSI/ANS 3.1 and RG 1.8, which endorses ANSI/ANS 3.1, are superseded by INPO accreditation in accordance with the revised rule, and that licensees may submit a request to the NRC for an administrative change to their TS to delete the TS requirements which have been superseded.

In accordance with the NRC guidance, the licensee has proposed the following administrative changes to Sections 6.3.1 and 6.4.1 of the TSs to clarify the current requirements for licensed operator qualifications and training:

1. Delete the requirement from TS Section 6.3.1 that licensed operators shall meet or exceed the minimum qualifications of "ANSI/ANS 3.1 1978" and "the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1990 NRC letter to all licensees."
2. Delete the requirement from TS Section 6.4.1 that the licensed operator retraining and replacement training programs "...shall meet or exceed the requirements of ANSI/ANS 3.1-1978...and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees..."

As shown in the proposed TS Sections 6.3.1 and 6.4.1, the licensed operator qualifications and training programs will continue to be required to comply with the requirements of 10 CFR 55, and the qualifications and training programs for all other affected unit staff will continue to be required to meet or exceed the standards of ANSI/ANS 3.1-1978 (except for Senior Health Physicists who will continue to be required to meet or exceed the qualifications of RG 1.8, September 1975).

We have reviewed the licensee's proposed changes to TS Sections 6.3.1 and 6.4.1 and conclude that they 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, 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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Date: August 5. 1992