

October 8, 1993

Docket Nos. 50-352  
and 50-353

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

Dear Mr. Hunger:

SUBJECT: LIMERICK GENERATING STATION, UNITS 1 AND 2, MODIFY THE REQUIREMENT FOR PLANT MANAGEMENT PERSONNEL TO HOLD A SENIOR REACTOR OPERATOR (SRO) LICENSE (TAC NOS. M86505 AND M86506)

The Commission has issued the enclosed Amendment No. 63 to Facility Operating License No. NPF-39 and Amendment No. 28 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 April 23, 1993.

These amendments would delete the requirement for the Superintendent - Technical, or the Technical Engineer to hold an SRO License. The licensee requested that the Plant Manager or the Superintendent - Operations or Assistant Superintendent - Operations hold an SRO License. This action will be handled in a separate amendment.

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

Sincerely,

/s/

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

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PDR ADOCK 05000352  
P PDR

Enclosures:

- Amendment No. 63 to License No. NPF-39  
Amendment No. 28 to License No. NPF-85

- Safety Evaluation  
cc w/enclosures:

See next page  
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Docket File	MO'Brien(2)	CGrimes, 11E21
NRC & Local PDRs	FRinaldi/JShea	TLiu
PDI-2 Reading	OGC	ACRS(10)
SVarga	DHagan, 3206	OPA
JCalvo	GHill(4), P1-22	OC/LFDCB
MBoyle	EWenzinger, RGN-I	CAnderson, RGN-I
*Previous Concurrence		

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OFC	: PDI-2/LA	: PDI-2/PM	: I/PDI-2	: *OGC	: PDI-2/D	:
NAME	: MO'Brien	: FRinaldi	: tlc:TL	:	: MLBoyle	:
DATE	: 10/1/93	: 10/6/93	: 10/6/93	: 09/28/93	: 10/6/93	:

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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and 50-353

October 8, 1993

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Sincerely,

A handwritten signature in cursive script, appearing to read "Frank Rinaldi".

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

Enclosures:

1. Amendment No. 63 to  
License No. NPF-39  
Amendment No. 28 to  
License No. NPF-85
2. Safety Evaluation

cc w/enclosures:  
See next page

Mr. George A. Hunger, Jr.  
Philadelphia Electric Company

Limerick Generating Station,  
Units 1 & 2

cc:

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

Mr. William P. Dornsife, Director  
Bureau of Radiation Protection  
PA Dept. of Environmental Resources  
P. O. Box 8469  
Harrisburg, Pennsylvania 17105-8469

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

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

Mr. David R. Helwig, Vice President  
Limerick Generating Station  
Post Office Box A  
Sanatoga, Pennsylvania 19464

Mr. James L. Kantner  
Regulatory Engineer  
Limerick Generating Station  
P. O. Box A  
Sanatoga, Pennsylvania 19464

Mr. Robert Boyce  
Plant Manager  
Limerick Generating Station  
P.O. Box A  
Sanatoga, Pennsylvania 19464

Library  
US Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
King of Prussia, PA 19406

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

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

Mr. Neil S. Perry  
Senior Resident Inspector  
US Nuclear Regulatory Commission  
P. O. Box 596  
Pottstown, Pennsylvania 19464

Mr. John Doering, Chairman  
Nuclear Review Board  
Philadelphia Electric Company  
955 Chesterbrook Boulevard  
Mail Code 52C-1  
Wayne, Pennsylvania 19087

Mr. Craig L. Adams  
Superintendent - Services  
Limerick Generating Station  
P.O. Box A  
Sanatoga, Pennsylvania 19464



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

PHILADELPHIA ELECTRIC COMPANY

DOCKET NO. 50-352

LIMERICK GENERATING STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 63  
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 April 23, 1993, 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. 63, 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



Michael L. Boyle, Acting 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: October 8, 1993

ATTACHMENT TO LICENSE AMENDMENT NO. 63

FACILITY OPERATING LICENSE NO. NPF-39

DOCKET NO. 50-352

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

Remove

6-3  
6-4

Insert

6-3  
6-4\*

## ADMINISTRATIVE CONTROLS

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### UNIT STAFF (Continued)

Any deviation from the above guidelines shall be authorized by the Plant Manager or personnel designated in administrative procedures 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 designated personnel to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized; and

- g. The Plant Manager or the Superintendent Operations, and the Assistant Superintendent Operations shall hold a Senior Reactor Operator License.

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

PHILADELPHIA ELECTRIC COMPANY

DOCKET NO. 50-353

LIMERICK GENERATING STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 28  
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 April 23, 1993, 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. 28, 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



Michael L. Boyle, Acting 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: October 8, 1993

ATTACHMENT TO LICENSE AMENDMENT NO. 28

FACILITY OPERATING LICENSE NO. NPF-85

DOCKET NO. 50-353

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

Remove

6-3  
6-4

Insert

6-3  
6-4\*

## ADMINISTRATIVE CONTROLS

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### 6.2.2 UNIT STAFF (Continued)

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 personnel designated in administrative procedures 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 designated personnel to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized; and

- g. The Plant Manager or the Superintendent Operations, and the Assistant Superintendent Operations shall hold a Senior Reactor Operator License.

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NOS. 63 AND 28 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 April 23, 1993, the Philadelphia Electric Company (PECo or the licensee) submitted a request for changes to the Limerick Generating Station (LGS), Units 1 and 2, Technical Specifications (TS). The requested changes would delete the requirement for the Superintendent-Technical or the Technical Engineer to hold a Senior Reactor Operator (SRO) license. The licensee requested that the Plant Manager or Superintendent-Operations or the Assistant Superintendent-Operations hold an SRO license. This action will be handled in a separate amendment. However, the proposed change will continue to satisfy the ANSI Standard ANSI/ANS-3.1-1978; "Standards for Selection and Training of Personnel for Nuclear Power Plants."

2.0 EVALUATION

In the submittal dated April 23, 1993, PECo proposed changes to the LGS TS to modify the management positions required to hold an SRO license at LGS. The Superintendent-Technical or the Technical Engineer; and the Plant Manager or Superintendent-Operations and Assistant Superintendent-Operations are currently required to hold an SRO license. The proposed change would remove the requirement for the Superintendent-Technical or the Technical Engineer to hold an SRO license and would relax the off-shift SRO license holder requirement to allow either the Plant Manager or Superintendent-Operations or Assistant Superintendent-Operations to hold an SRO license.

There is no regulatory requirement for the Superintendent-Technical or the Technical Engineer to hold an SRO license. In addition, neither the Superintendent-Technical nor the Technical Engineer are in the chain of command for the licensed operators at LGS; consequently, they do not direct the activities of the licensed operators and do not require an SRO license.

The proposed change to relax the off-shift SRO license holder requirement to allow either the Plant Manager or Superintendent-Operations or Assistant Superintendent-Operations to hold an SRO license is being further evaluated by the Human Factors Assessment Branch.

The staff concludes that the proposed change to the Limerick Generating Station, Units 1 and 2, Technical Specifications deleting the requirement for the Superintendent-Technical or the Technical Engineer to hold an SRO license is consistent with and meets the intent of the relevant review criteria (SRP 13.1 and ANSI/ANS 3.1-1978) and is, therefore, acceptable.

#### 4.0 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.

#### 5.0 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.

#### 6.0 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.

Principal Contributor: R. Pelton

Date: October 8, 1993