

October 4, 1990

Docket Nos. 50-352  
and 50-353

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GSuh	Wanda Jones	
MO'Brien	Tech Branch	

Mr. George A. Hunger, Jr.  
Director-Licensing, MC 5-2A-5  
Philadelphia Electric Company  
Nuclear Group Headquarters  
Correspondence Control Desk  
P.O. Box No. 195  
Wayne, Pennsylvania 19087-0195

Dear Mr. Hunger:

SUBJECT: STATION QUALIFIED REVIEWER PROGRAM (TSCR NO. 89-15), LIMERICK  
GENERATING STATION, UNITS 1 AND 2 (TAC NOS. 77209 AND 77210)

The Commission has issued the enclosed Amendment No. 47 to Facility Operating License No. NPF-39 and Amendment No. 10 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 July 13, 1990.

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

A copy of 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. 47 to License No. NPF-39  
Amendment No. 10 to License No. NPF-85
- Safety Evaluation

cc w/enclosures:  
See next page

DOCUMENT NAME: TAC NOS. 77209/210

*[Handwritten initials]*  
RD/PA  
10/13/90

PDI-2/PM  
RClark  
08/20/90

OGC  
*[Handwritten initials]*  
09/21/90

*[Handwritten initials]*  
PDI-2/D  
WButler  
10/13/90

LPEB *[Handwritten initials]*  
Fallenspach  
10/13/90

*[Handwritten initials]*  
C/LPEB  
AGody, Sr.  
10/13/90

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9010140261 901004  
PDR ADOCK 05000352  
P PNU

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Sincerely,

/S/

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

Enclosures:

1. Amendment No. 47 to License No. NPF-39  
Amendment No. 10 to License No. NPF-85
2. Safety Evaluation

cc w/enclosures:

See next page

DOCUMENT NAME: TAC NOS. 77209/210

*MO'Brien*  
10/12/90

PDI-2/PM  
RClark  
08/20/90

OGC  
/ /90

PDI-2/D  
WButler  
/ /90



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

October 4, 1990

Docket Nos. 50-352  
and 50-353

Mr. George A. Hunger, Jr.  
Director-Licensing, MC 5-2A-5  
Philadelphia Electric Company  
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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. 47 to  
License No. NPF-39  
Amendment No. 10 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:

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P. O. Box A  
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. 47  
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 July 13, 1990, 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. 47, 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 ADDCK 05000352  
P PNU

3. This license amendment is effective 90 days from date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

*Walter R. Butler*

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

Attachment: Changes to the Technical  
Specifications

Date of Issuance: October 4, 1990

PDI-2/MA  
MO: Butler  
10/14/90

PDI-2/PM  
RClark  
10/03/90

OGC  
cpw  
09/27/90

PDI-2/D  
WButler  
10/14/90

\* See previous concurrence.

90 days from

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:

PDI-2/LA  
N. Brien  
190

PDI-2/PM  
R. Clark  
08/20/90

OGC  
9/21/90

PDI-2/D  
W. Butler  
10/13/90

ATTACHMENT TO LICENSE AMENDMENT NO. 47

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>
xxvii	xxvii
xxviii	xxviii*
6-7	6-7*
6-8	6-8
6-11	6-11*
6-12	6-12
-	6-12a
-	-
6-13	6-13
6-14	6-14*
6-19	6-19
6-20	6-20*

INDEX

ADMINISTRATIVE CONTROLS

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<u>SECTION</u>	<u>PAGE</u>
6.5.2 NUCLEAR REVIEW BOARD (NRB)	
Function .....	6-9
Composition .....	6-9
Alternates.....	6-10
Consultants.....	6-10
Meeting Frequency.....	6-10
Quorum.....	6-10
Review.....	6-10
Audits.....	6-11
Records.....	6-12
6.5.3 PROGRAM/PROCEDURE REVIEW AND APPROVAL.....	6-12
<u>6.6 REPORTABLE EVENT ACTION.....</u>	6-12a
<u>6.7 SAFETY LIMIT VIOLATION.....</u>	6-12a
<u>6.8 PROCEDURES AND PROGRAMS.....</u>	6-13
<u>6.9 REPORTING REQUIREMENTS</u>	
6.9.1 ROUTINE REPORTS .....	6-15
Startup Report.....	6-15
Annual Reports .....	6-15
Monthly Operating Reports.....	6-16
Annual Radiological Environmental Operating Report.....	6-16
Semiannual Radioactive Effluent Release Report.....	6-17
CORE OPERATING LIMITS REPORTS.....	6-18a
6.9.2 SPECIAL REPORTS.....	6-18a
<u>6.10 RECORD RETENTION.....</u>	6-19
<u>6.11 RADIATION PROTECTION PROGRAM.....</u>	6-20
<u>6.12 HIGH RADIATION AREA.....</u>	6-20

INDEX

ADMINISTRATIVE CONTROLS

---

<u>SECTION</u>	<u>PAGE</u>
6.13 PROCESS CONTROL PROGRAM (PCP).....	6-21
6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM).....	6-22
6.15 MAJOR CHANGES TO RADIOACTIVE WASTE TREATMENT SYSTEMS.....	6-22

## 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 site training organization and shall meet or exceed the requirements of ANSI/ANS 3.1-1978 and 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.

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.

## ADMINISTRATIVE CONTROLS

### 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 Executive 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.

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 Executive 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 Executive 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 Corporate Officer(s) and management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.

6.5.3 PROGRAM/PROCEDURE REVIEW AND APPROVAL

All programs and procedures required by Specification 6.8 shall be reviewed and approved as described below.

6.5.3.1 Each new program, procedure, or change thereto shall be independently reviewed by a Station Qualified Reviewer (SQR) who is knowledgeable in the functional area affected but is not the individual preparer. The SQR may be from the same organization as the preparer. The SQR shall render a determination in writing of whether or not cross-disciplinary review of a new program, procedure, or change thereto is necessary. If necessary, such review shall be performed by appropriate personnel.

6.5.3.2 Each new program, procedure, or change thereto shall be reviewed by the Superintendent designated by Administrative Procedures as the responsible Superintendent for that program or procedure, and the review shall include a determination of whether or not a 10 CFR 50.59 safety evaluation is required. If a 10 CFR 50.59 safety evaluation is not required, the new program, procedure, or change thereto shall be approved by the responsible Superintendent or the Plant Manager prior to implementation. Administrative Procedures shall be reviewed by PORC prior to approval. Administrative Procedures, Security Plan Implementing Procedures, and Emergency Plan Implementing Procedures shall be approved by the Plant Manager or his designated alternate in accordance with Specification 6.1.1.

6.5.3.3 If the responsible Superintendent determines that a new program, procedure, or change thereto requires a 10 CFR 50.59 safety evaluation, the responsible Superintendent shall render a determination in writing of whether or not the new program, procedure, or change thereto involves an unreviewed safety question (USQ), and shall forward the new program, procedure, or change thereto with the associated safety evaluation to PORC for review. If an USQ is involved, NRC approval is required by 10 CFR 50.59 prior to implementation of the new program, procedure, or change.

6.5.3.4 Personnel recommended to be SQRs shall be approved and designated as such by the PORC Chairman. The responsible Superintendents shall ensure that a sufficient complement of SQRs for their functional area is maintained in accordance with Administrative Procedures. The SQRs shall meet or exceed the qualifications described in Section 4.4 of ANSI/ANS 3.1-1978.

6.5.3.5 Temporary procedure changes shall be reviewed and approved in accordance with Specification 6.8.3.

6.5.3.6 Records documenting the activities performed under Specifications 6.5.3.1 through 6.5.3.5 shall be maintained in accordance with Specification 6.10.

#### 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.
- 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 the 14 days of the violation.

SAFETY LIMIT VIOLATION (Continued)

- 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, and any other procedure or procedure change that the Plant Manager determines to affect nuclear safety, shall be reviewed and approved in accordance with Specifications 6.5.1.6, 6.5.1.7 and/or 6.5.3, as appropriate, prior to implementation. Each procedure of Specification 6.8.1 shall also be 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 an SQR in accordance with Specification 6.5.3.1, and approved by either the Plant Manager or his designated alternate in accordance with Specification 6.1.1, or the Superintendent designated by Administrative Procedures as the responsible Superintendent for that procedure within 14 days of implementation.

## ADMINISTRATIVE CONTROLS

### 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.

## ADMINISTRATIVE CONTROLS

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### 6.10 RECORD RETENTION

6.10.1 In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, the following records shall be retained for at least the minimum period indicated.

6.10.2 The following records shall be retained for at least 5 years:

- a. Records and logs of unit operation covering time interval at each power level.
- b. Records and logs of principal maintenance activities, inspections, repair, and replacement of principal items of equipment related to nuclear safety.
- c. ALL REPORTABLE EVENTS.
- d. Records of surveillance activities, inspections, and calibrations required by these Technical Specifications.
- e. Records of changes made to the programs and procedures required by Specification 6.8.
- f. Records of radioactive shipments.
- g. Records of sealed source and fission detector leak tests and results.
- h. Records of annual physical inventory of all sealed source material of record.

6.10.3 The following records shall be retained for the duration of the unit Operating License:

- a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers, and assembly burnup histories.
- c. Records of radiation exposure for all individuals entering radiation control areas.

## ADMINISTRATIVE CONTROLS

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### RECORD RETENTION (Continued)

- d. Records of gaseous and liquid radioactive material released to the environs.
- e. Records of transient or operational cycles for those unit components identified in Table 5.6.1-1.
- f. Records of reactor tests and experiments.
- g. Records of training and qualification for current members of the unit staff.
- h. Records of inservice inspections performed pursuant to these Technical Specifications.
- i. Records of quality assurance activities required by the Operational Quality Assurance Manual not listed in Section 6.10.2.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- k. Records of meetings of the PORC and the NRB.
- l. Records of the service lives of all snubbers including the date at which the service life commences and associated installation and maintenance records.
- m. Records of analysis required by the Radiological Environmental Monitoring Program that would permit evaluation of the accuracy of the analysis at a later date.

### 6.11 RADIATION PROTECTION PROGRAM

6.11.1 Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

### 6.12 HIGH RADIATION AREA

6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR Part 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/h but less than 1000 mrem/h shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP)\*. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.

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\*Health physics personnel or personnel escorted by health physics personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they are otherwise following plant radiation protection procedures for entry into high radiation areas.



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. 10  
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 July 13, 1990, 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. 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.

3. This license amendment is effective 90 days from 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 4, 1990

PDI-2/MA  
MO Bryen  
10/4/90

PDI-2/PM  
RClark  
10/03/90

OGC\*  
CPW  
09/27/90

PDI-2/D  
WButler  
10/14/90

\* See previous Concurrences

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:

PDI-2/KA  
MO'Brien  
8/29/90

PDI-2/PM  
RClark *etc*  
08/20/90

OGG *OPW*  
9/21/90

PDI-2/D *WB*  
WButler  
10/13/90

3. This license amendment is effective 90 days from 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 4, 1990

ATTACHMENT TO LICENSE AMENDMENT NO. 10

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.\*

<u>Remove</u>	<u>Insert</u>
xxvii	xxvii
xxviii	xxviii*
6-7	6-7*
6-8	6-8
6-11	6-11*
6-12	6-12
-	6-12a
-	-
6-13	6-13
6-14	6-14*
6-19	6-19
6-20	6-20*

INDEX

ADMINISTRATIVE CONTROLS

---

<u>SECTION</u>	<u>PAGE</u>
6.5.2 NUCLEAR REVIEW BOARD (NRB)	
Function .....	6-9
Composition .....	6-9
Alternates.....	6-10
Consultants.....	6-10
Meeting Frequency.....	6-10
Quorum.....	6-10
Review.....	6-10
Audits.....	6-11
Records.....	6-12
6.5.3 PROGRAM/PROCEDURE REVIEW AND APPROVAL.....	6-12
<u>6.6 REPORTABLE EVENT ACTION.....</u>	6-12a
<u>6.7 SAFETY LIMIT VIOLATION.....</u>	6-12a
<u>6.8 PROCEDURES AND PROGRAMS.....</u>	6-13
<u>6.9 REPORTING REQUIREMENTS</u>	
6.9.1 ROUTINE REPORTS .....	6-15
Startup Report.....	6-15
Annual Reports .....	6-15
Monthly Operating Reports.....	6-16
Annual Radiological Environmental Operating Report.....	6-16
Semiannual Radioactive Effluent Release Report.....	6-17
CORE OPERATING LIMITS REPORT.....	6-18a
6.9.2 SPECIAL REPORTS.....	6-18a
<u>6.10 RECORD RETENTION.....</u>	6-19
<u>6.11 RADIATION PROTECTION PROGRAM.....</u>	6-20
<u>6.12 HIGH RADIATION AREA.....</u>	6-20

INDEX

ADMINISTRATIVE CONTROLS

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<u>SECTION</u>	<u>PAGE</u>
<u>6.13 PROCESS CONTROL PROGRAM (PCP).....</u>	<u>6-21</u>
<u>6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM).....</u>	<u>6-22</u>
<u>6.15 MAJOR CHANGES TO RADIOACTIVE WASTE TREATMENT SYSTEMS.....</u>	<u>6-22</u>

## ADMINISTRATIVE CONTROLS

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### 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 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.

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.

## ADMINISTRATIVE CONTROLS

### 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 Executive 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.

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 Executive 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 Executive 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 Corporate Officer(s) and management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.

6.5.3 PROGRAM/PROCEDURE REVIEW AND APPROVAL

All programs and procedures required by Specification 6.8 shall be reviewed and approved as described below.

6.5.3.1 Each new program, procedure, or change thereto shall be independently reviewed by a Station Qualified Reviewer (SQR) who is knowledgeable in the functional area affected but is not the individual preparer. The SQR may be from the same organization as the preparer. The SQR shall render a determination in writing of whether or not cross-disciplinary review of a new program, procedure, or change thereto is necessary. If necessary, such review shall be performed by appropriate personnel.

6.5.3.2 Each new program, procedure, or change thereto shall be reviewed by the Superintendent designated by Administrative Procedures as the responsible Superintendent for that program or procedure, and the review shall include a determination of whether or not a 10 CFR 50.59 safety evaluation is required. If a 10 CFR 50.59 safety evaluation is not required, the new program, procedure, or change thereto shall be approved by the responsible Superintendent or the Plant Manager prior to implementation. Administrative Procedures shall be reviewed by PORC prior to approval. Administrative Procedures, Security Plan Implementing Procedures, and Emergency Plan Implementing Procedures shall be approved by the Plant Manager or his designated alternate in accordance with Specification 6.1.1.

## ADMINISTRATIVE CONTROLS

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6.5.3.3 If the responsible Superintendent determines that a new program, procedure, change thereto requires a 10 CFR 50.59 safety evaluation, the responsible Superintendent shall render a determination in writing of whether or not the new program, procedure, or change thereto involves an unreviewed safety question (USQ) and shall forward the new program, procedure, or change thereto with the associated safety evaluation to PORC for review. If an USQ is involved, NRC approval is required by 10 CFR 50.59 prior to implementation of the new program, procedure, or change.

6.5.3.4 Personnel recommended to be SQRs shall be approved and designated as such by the PORC Chairman. The responsible Superintendents shall ensure that a sufficient complement of SQRs for their functional area is maintained in accordance with Administrative Procedures. The SQRs shall meet or exceed the qualifications described in Section 4.4 of ANSI/ANS 3.1-1978.

6.5.3.5 Temporary procedure changes shall be reviewed and approved in accordance with Specification 6.8.3.

6.5.3.6 Records documenting the activities performed under Specifications 6.5.3.1 through 6.5.3.5 shall be maintained in accordance with Specification 6.10.

### 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.
- 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 the 14 days of the violation.

SAFETY LIMIT VIOLATION (Continued)

- 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, and any other procedure or procedure change that the Plant Manager determines to affect nuclear safety, shall be reviewed and approved in accordance with Specifications 6.5.1.6, 6.5.1.7 and/or 6.5.3, as appropriate, prior to implementation. Each procedure of Specification 6.8.1 shall also be 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 an SQR in accordance with Specification 6.5.3.1, and approved by either the Plant Manager or his designated alternate in accordance with Specification 6.1.1, or the Superintendent designated by Administrative Procedures as the responsible Superintendent for that procedure 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.

## ADMINISTRATIVE CONTROLS

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### 6.10 RECORD RETENTION

6.10.1 In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, the following records shall be retained for at least the minimum period indicated.

6.10.2 The following records shall be retained for at least 5 years:

- a. Records and logs of unit operation covering time interval at each power level.
- b. Records and logs of principal maintenance activities, inspections, repair, and replacement of principal items of equipment related to nuclear safety.
- c. ALL REPORTABLE EVENTS.
- d. Records of surveillance activities, inspections, and calibrations required by these Technical Specifications.
- e. Records of changes made to the programs and procedures required by Specification 6.8.
- f. Records of radioactive shipments.
- g. Records of sealed source and fission detector leak tests and results.
- h. Records of annual physical inventory of all sealed source material of record.

6.10.3 The following records shall be retained for the duration of the unit Operating License:

- a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers, and assembly burnup histories.
- c. Records of radiation exposure for all individuals entering radiation control areas.

## ADMINISTRATIVE CONTROLS

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### RECORD RETENTION (Continued)

- d. Records of gaseous and liquid radioactive material released to the environs.
- e. Records of transient or operational cycles for those unit components identified in Table 5.6.1-1.
- f. Records of reactor tests and experiments.
- g. Records of training and qualification for current members of the unit staff.
- h. Records of inservice inspections performed pursuant to these Technical Specifications.
- i. Records of quality assurance activities required by the Operational Quality Assurance Manual not listed in Section 6.10.2.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- k. Records of meetings of the PORC and the NRB.
- l. Records of the service lives of all snubbers including the date at which the service life commences and associated installation and maintenance records.
- m. Records of analysis required by the Radiological Environmental Monitoring Program that would permit evaluation of the accuracy of the analysis at a later date.

### 6.11 RADIATION PROTECTION PROGRAM

6.11.1 Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

### 6.12 HIGH RADIATION AREA

6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR Part 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/h but less than 1000 mrem/h shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP)\*. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.

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\*Health physics personnel or personnel escorted by health physics personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they are otherwise following plant radiation protection procedures for entry into high radiation areas.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NOS. 47 AND 10 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 July 13, 1990, Philadelphia Electric Company (the licensee) requested an amendment to Facility Operating License Nos. NPF-39 and NPF-85 for the Limerick Generating Station, Units 1 and 2. These proposed amendments would change the Administrative Controls section (Section 6.0) of the Technical Specifications (TS), including the addition of a new TS Section 6.5.3, to reflect the implementation of a Station Qualified Reviewer (SQR) Program for review and approval of new station programs, procedures, and changes thereto. The SQR Program is a program/procedural review and approval process using qualified reviewers to perform a review and designated Superintendents for approval of new programs, procedures, and changes thereto. This program has been approved by the NRC for a number of facilities, including the Public Service Electric and Gas (PSE&G) Company facilities.

2.0 The Proposed Amendment

There are two key areas of importance under the SQR program:

- The Plant Operations Review Committee (PORC) will no longer be required to render a determination as to whether or not a new program, procedure, or change thereto constitutes an unreviewed safety question (USQ) in accordance with 10 CFR 50.59.
- PORC will no longer be required to review and recommend approval/disapproval of new programs or program changes and certain types of procedures or procedure changes to the Plant Manager.

The SQR Program will function as follows:

- o The PORC Chairman approves plant personnel recommended to be Station Qualified Reviewers (SQRs) for specific types of programs and classes of procedures. The SQR will be an individual knowledgeable in the functional area affected and may be from the same organization, but who is not the individual preparer.

- ° The Plant Manager, as authorized by Administrative Procedures, appoints plant Superintendents to be responsible for approving specific types of programs and classes of procedures. The appointed Superintendent will be the individual responsible for and cognizant of the affected functional area.
- ° Each new program, procedure, or change thereto is reviewed by the designated SQR. The SQR determines when a cross-disciplinary review by other personnel is necessary prior to approval. The new program, procedure, or change thereto and accompanying 10 CFR 50.59 Review documentation (i.e., evaluation of the proposed change, new procedure or new program in accordance with 10 CFR 50.59) is reviewed by the responsible Superintendent, including a determination as to whether a 10 CFR 50.59 safety evaluation is required or not. If not, the new program, procedure, or change thereto is then approved by the responsible Superintendent or the Plant Manager. If a 10 CFR 50.59 safety evaluation is required, the entire new program, procedure, or change package, including the 10 CFR 50.59 safety evaluation, is reviewed by PORC.
- ° PORC continues to be responsible for the review and recommendation for approval/disapproval of Administrative Procedures, and any new program, procedure, or change thereto that requires an unreviewed safety question determination (i.e., 10 CFR 50.59 safety evaluation) be performed.
- ° The Plant Manager continues to be responsible for the approval of Administrative Procedures, Security Plan Implementing Procedures, Emergency Plan Implementing Procedures, and any new program, procedure, or change thereto that requires an unreviewed safety question determination (i.e., 10 CFR 50.59 safety evaluation) be performed.
- ° Temporary procedure changes (TPCs) will be implemented as before, however, the TPC will be reviewed by the designated SQR (including a cross-disciplinary review, if necessary) and approved by the Plant Manager or responsible Superintendent, as appropriate, within 14 days of implementation.

### 3.0 Evaluation

Section 13.5.1 (Administrative Procedures) of the Standard Review Plan (SRP) requires that the staff determine that "the applicant has described the program and procedures that provide administrative controls over activities important to safety. These include the activities of the preparation, review, and approval of plant operating and maintenance procedures, . . . .". For Limerick, PECO had proposed in the FSAR that procedures be reviewed by the Plant Operations Review Committee (PORC). In Section 13.5.1 (page 13-18) of the staff's SER on Limerick (NUREG-0991), the staff noted:

"The plant procedures are normally prepared by the station operating staff. However, organizations providing technical support and consultants may assist in procedure development. The procedures and their revisions are reviewed by the PORC, or by a subcommittee appointed by PORC, and by the Superintendent, Quality Assurance Division; they are approved by the

Station Superintendent or Assistant Station Superintendent before they are used."

There have been some changes in titles of plant management but changes to programs and procedures are still reviewed by PORC. At the NTOL phase, when many new procedures were being developed, the applicant's proposal to have procedures reviewed by PORC was an acceptable means of providing administrative controls over activities important to safety (SRP 13.5.1). The major workload now is not development of new procedures but the self-imposed requirement to periodically review all procedures (procedures are reviewed on a two year and/or five year cycle) and improvements to procedures indicated by plant experience. The present requirement to have PORC review all procedures and programs has worked satisfactorily. There have been no significant regulatory concerns identified with PORC's review of programs and procedures. Since the present system is working - from a regulatory standpoint - the staff assessed the disadvantages of the present arrangement as part of our assessment of whether the proposed new program (the SQR) would provide an acceptable level of control over programs and procedures.

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

Under the proposed program, the PORC Chairman will approve plant personnel recommended to be SQRs for specific types of programs and procedures. The Plant Manager, as authorized by Administrative Procedures, will appoint Plant Superintendents to be responsible for approving specific types of programs and classes of procedures. The appointed Superintendent will be the individual responsible for and cognizant of the affected functional area.

The program will be controlled by Administrative Procedures which will continue to be reviewed by PORC and approved by the Plant Manager. PORC will continue to review those new programs, procedures, and changes thereto for which an unreviewed safety question determination (i.e., 10 CFR 50.59 safety evaluation) is required to be performed. As a result, the proposed administrative changes will not decrease the safety oversight function which PORC performs.

A number of nuclear facilities have a SQR program similar to that proposed by the licensee, including Salem and Hope Creek. An Integrated Performance Assessment Team, (IPAT) Inspection was conducted by NRC at Salem during May 14 - 25, 1990. The team found that some procedure changes were conducted without the required 50.59 safety evaluations. Because of incomplete screening criteria, inadequate training and a misunderstanding on the part of SQRs and station management, issues that should have been reviewed by the Station Operations Review Committee were not.

There are some significant differences between the program that existed at Salem at the time of the IPAT inspection and the SQR program proposed by PECO. These additional controls should preclude the problems found by the NRC inspection team at Salem. On July 6, 1989, PECO issued a new administrative procedure - NA-02R002 - applicable to the entire nuclear group (i.e., corporate, licensing, Limerick and Peach Bottom). The procedure implemented NSAC/125, "Guidelines for 10 CFR 50.59 Safety Evaluations". The procedure provides instructions to the entire PECO nuclear group on the preparation of 10 CFR 50.59 safety evaluations. All personnel who might be involved in these types of reviews were given training on the procedure. PECO declared the procedure fully implemented on December 1, 1989.

NA-02R002 requires that the assessment of whether a 50.59 safety evaluation is required must be documented. Additionally, PECO is proposing that the SQR only apply to procedures and programs but not to modifications, tests and experiments. The proposed program at Limerick assures an independent review process. The Limerick plant management has a strong safety perspective, as reflected in the SALP reports.

There are some other differences between the TSs proposed by PECO for Limerick and the TSs approved by the Commission authorizing the SQR program at Salem and Hope Creek. In approving the SQR program for other licensees, the staff has required that SQRs meet certain qualifications. For example, Section 6.5.3.2c of the Hope Creek TSs states that: "The Station Qualified Reviewers shall meet or exceed the qualifications described in Section 4.4 of ANS 3.1, 1981." Section 6.5.3.2c of the Salem TSs states that "A system of Station Qualified Reviewers, each of whom shall possess qualifications that meet or exceed the requirements of Section 4.4 of ANSI N 18.1-1971, shall be maintained by the SORC Chairman." The new Section 6.5.3 proposed by PECO does not contain a similar requirement because the present Limerick TSs in Section 6.3.1 on Unit Staff Qualifications requires that "Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 for comparable positions." The personnel who will be approved as SQRs at Limerick will be members of the unit staff and thus will be required to meet the ANSI/ANS 3.1 qualifications. However, the staff concluded that the qualifications should reference Section 4.4 of the Standard, which applies to technical and professional personnel. The licensee agreed to adding a sentence to Section 6.5.3.4 (page 6-12a) of the TSs similar to that in the Hope Creek TSs. The added sentence reads: "The SQRs shall meet or exceed the qualifications described in Section 4.4. of ANSI/ANS 3.1 - 1978." With this addition, the staff concludes that the proposed TSs adequately address the qualification of the SQRs.

Another difference between the TSs approved by the Commission for Hope Creek and Salem vs the TSs proposed by PECO is in Section 6.5.1.6e. In the present Limerick TSs, this Section requires that PORC shall be responsible for "review of the safety evaluations for procedures and changes thereto completed under the provisions of 10 CFR 50.59". PECO is proposing to delete Section 6.5.1.6e and incorporate the same requirement in a more explicit revised Section 6.5.1.6a. The latter specifically requires PORC to review the entire package - the pro-

cedure as well as the 10 CFR 50.59 safety evaluation. In the Hope Creek and Salem TSs, Section 6.5.1.6e was retained because it requires the SORC to review all 50.59 safety evaluations (i.e., for modifications and tests and experiments as well as procedures and programs). As discussed above, the revised Section 6.5.1.6a will require PORC to review all programs or procedures or changes thereto for which the applicable Superintendent has determined that a 10 CFR 50.59 safety evaluation is needed. PORC is not, however, the approving authority. Section 6.5.1.7a (which is not being changed) requires that PORC "recommend in writing to the Plant Manager approval or disapproval" of the proposed programs or procedures. The Plant Manager is the approval authority.

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

#### 4.0 ENVIRONMENTAL CONSIDERATION

These amendments relate to changes in recordkeeping, reporting or administrative procedures or requirements. Accordingly, these 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 these amendments.

#### 5.0 CONCLUSION

The Commission made a proposed determination that these amendments involve no significant hazards consideration which was published in the Federal Register (55 FR 34380) on August 22, 1990 and consulted with the Commonwealth of Pennsylvania. No public comments were received and the Commonwealth 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, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of these amendments will not be inimical to the common defense and the security nor to the health and safety of the public.

Dated: October 4, 1990

Principal Contributor: Dick Clark