

50-352/353



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

October 17, 1995

Mr. George A. Hunger, Jr.  
Director-Licensing, MC 62A-1  
PECO Energy Company  
nuclear Group Headquarters  
Correspondence Control desk  
P.O. Box 195  
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SUBJECT: CORRECTION TO AMENDMENTS NOS. 96 AND 60, LIMERICK GENERATING STATION,  
UNITS 1 AND 2 (TAC NOS. M90983 AND M90984)

Dear Mr. Hunger:

On July 18, 1995, the Commission issued Amendment No. 96 to Facility Operating License No. NPF-39 and Amendment No. 60 to Facility Operating License No. NPF-85 for the Limerick Generating Station, Units 1 and 2, in response to your application of November 21, 1994, as supplemented April 6, 1995, and July 3, 1995. These amendments made changes affecting the Administrative Controls Section of the Technical Specifications (TS).

By letter dated August 10, 1995, you indicated that in your original November 21, 1994 application TS Sections 6.2.4, "Shift Technical Advisor," and 6.3, "Unit Staff Qualifications," were inadvertently removed from TS page 6-6 for both units due to an administrative oversight. In addition, your August 10, 1995, letter indicated that TS Unit 1 page 6-7 was submitted with a spelling error in TS Section 6.5.1.1. You requested that Unit 1 and 2 TS page 6-6 and Unit 1 TS page 6-7 be re-issued with the inadvertently deleted text restored and the spelling error corrected. "Senior Health Physicist" in Section 6.3, TS page 6-6, both units, has been changed to read, "Manager-Radiations Protection," to conform with our letter dated July 18, 1995, issuing Amendment Nos. 96 and 60, in which we indicated that the new position titles described in your submittal of November 21, 1994, were acceptable for the reason stated in the safety evaluation (SE) accompanying the amendments.

Also, the staff has determined that some errors appeared in pages 5 and 6 of our SE. The staff's corrections include: 1) inserting the word "acceptable" at the end of the last paragraph on page 5; 2) replacing "TS" with "UFSAR" in the first paragraph, fifth line, and third paragraph, fourth line, of page 6; and 3) replacing reference "3.1" with "3.3" in the third paragraph, first line of page 6.

Further, as requested by the NRC staff and described in your response of April 6, 1995, you committed to relocating the NRB review and audit details to Chapter 17 of the UFSAR, which is controlled under the provisions of 10 CFR 50.54(a)(3). Accordingly, the fifth paragraph of page 6 of the SE with Amendment Nos. 96 and 60 has been revised to reflect this commitment.

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Enclosed are the corrected referenced TS and SE pages.

Sincerely,

/S/

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

Docket Nos. 50-352/353

Enclosures: Technical Specification  
Pages 6-6, both units, and 6-7,  
Unit 2 only, and Safety Evaluation  
Pages 5 and 6

cc w/encls: See next page

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G. A. Hunger

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Enclosed are the corrected referenced TS and SE pages.

Sincerely,



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

Docket Nos. 50-352/353

Enclosures: Technical Specification  
Pages 6-6, both units, and 6-7,  
Unit 2 only, and Safety Evaluation  
Pages 5 and 6

cc w/encls: See next page

Mr. George A. Hunger, Jr.  
PECO Energy Company

Limerick Generating Station,  
Units 1 & 2

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of Limerick Township  
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6.2.3 DELETED. The information from this section is located in the UFSAR.

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 meet the qualifications specified by the 1985 NRC Policy Statement on Engineering Expertise on Shift.

6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 for comparable positions, except for the Manager - Radiation Protection 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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## ADMINISTRATIVE CONTROLS

### 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 Plant Operations Review Committee is composed of nine regular members from the Limerick Generating Station staff. Members shall collectively have experience in the following areas:

- Plant Operations
- Engineering
- Maintenance
- Instrumentation and Controls
- Planning
- Radiation Safety
- Chemistry
- Experience Assessment

Members shall meet the requirements of ANSI/ANS 3.1-1978, Section 4.7, for the applicable required experience and be appointed in writing by the Plant Manager. The Chairman and alternate Chairman of the PORC shall be drawn from the PORC members and appointed in writing by the Plant Manager.

##### 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.

6.2.3 DELETED. The information from this section is located in the UFSAR.

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 meet the qualifications specified by the 1985 NRC Policy Statement on Engineering Expertise on Shift.

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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 Manager - Radiation Protection 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.

### 3.3 TS Change Request 94-51-0

PECo proposes to delete TS Section 6.2.3, and to relocate the independent technical review program in UFSAR Section 17.2.1.2.3.2. In relocating the independent technical review functions to the UFSAR, PECO is eliminating the ISEG composition requirement while maintaining the independent technical review function by establishing an independent technical review program. In UFSAR Section 17.2.1.2.3.2, PECO has revised this TS requirement to delete the requirement of at least five dedicated, full time engineers, and has integrated this function into the Nuclear Quality Division. In addition, this function is being retitled the Independent Technical Review Program. PECO will utilize several on-site personnel who are independent of the plant management chain to perform this function.

The staff finds that the revised Independent Technical Review Program provisions meet the appropriate acceptance criteria of Section 13.4 of NUREG 0800, and will be under the control of the provisions of 10 CFR 50.54(a)(3) which is applicable to Section 17.2 of the UFSAR. Therefore, the staff finds the deletion of this requirement from the TS and its relocation in UFSAR Section 17.2.1.2.3.2 (as described in PECO's April 6, 1995, letter) acceptable.

### 3.4 TS Change Request 94-52-0 & TS Change Request 94-53-0

PECo proposes to delete TS Section 6.5.2.7, NRB review responsibilities, and TS Section 6.5.2.8, NRB audit responsibilities. PECO states that NRB review, audit, and assessment details are addressed in UFSAR Chapter 17, Section 17.2.1.2.5.

These specific requirements, which are being relocated from the TS to the UFSAR, are not required to be in the TS under 10 CFR 50.36 or § 182a of the Atomic Energy Act, and are not required to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety. Further, they do not fall within any of the four criteria set forth in the Commission's Final Policy Statement, discussed above. In addition, the staff finds that sufficient regulatory controls exist under 10 CFR 50.54(a) to address future changes to these requirements. Accordingly, the staff has concluded that these requirements may be relocated from the TS to the licensee's UFSAR.

The relocated requirements are subject to the provisions of 10 CFR 50.54(a)(3). Therefore, the staff finds the deletion of this requirement from the TS and its relocation to UFSAR Chapter 17 acceptable.

### 3.5 QAPD Changes

PECo proposes to delete reference in the QAPD to the ISEG and will reference the new Independent Technical Review Program in Sections 17.2.1.2.3.1 and 17.2.2.16. Additionally, responsibility for the Independent Technical Review Program is assigned to the Quality Division Manager. PECO also proposes to delete UFSAR Section 17.2.1.2.3.2 which describes the location of the ISEG in the UFSAR.

In addition, PECO has revised the Nuclear Quality Assurance Organization Chart, Figure 17.2-4, by deleting the ISEG organization. The new Independent Technical Review Program will be the responsibility of the Quality Division Manager.

As noted above (3.3), the restructuring of the ISEG function to the Independent Technical Review Program is acceptable. The Independent Technical Review Program is subject to the provisions of 10 CFR 50.54(a)(3). Therefore, the deletion of UFSAR Section 17.2.1.2.3.2 and its relocation in UFSAR Chapter 17, as described in PECO's April 6, 1995, letter, is acceptable.

PECo is also proposing in UFSAR Chapter 17, Section 17.2.1.2.5, to change the term audit to assessment, and that the assessment program is as described in UFSAR Section 17.2.18, "Audits." Further, PECO proposes to increase the audit/assessment frequency to 24 months for: (1) conformance of unit operation to provisions contained within the TS and applicable License Conditions, (2) performance, training, and qualifications of the operating staff, (3) results of actions taken to correct deficiencies occurring in unit equipment, structures, systems, or a method of operation that affect nuclear safety, (4) radiological environmental monitoring program and the results thereof, and (5) performance of activities required by the Quality Assurance Program to meet the criteria of RG 4.15, "Quality Assurance for Radiological Monitoring Programs (Normal Operations)-Effluent Streams and the Environment," December 1977.

Also PECO proposes to change UFSAR Section 17.2.18.6, listing specific NRB review and audit details. The staff finds this change acceptable, since the information should remain under the provisions of 10 CFR 50.54(a)(3). This assures NRC notification of any commitment reduction. Further, the staff notes that the TS and QAPD changes should be implemented simultaneously.

Pursuant to 10 CFR 50.54(a)(3), PECO states that the UFSAR changes will reduce the commitments in its QA Program. PECO states that these changes in frequency will result in an increase in QA program effectiveness and that for such assessment activities to be effective, they should be performed with a frequency commensurate with their safety significance, and with due consideration of performance data. PECO further states that the reduced frequency can be substantiated by the fact that on-going surveillances are performed during the interval between assessments and that these surveillances are conducted to provide progressive assessments of functional performance.