

July 18, 1995

Mr. George A. Hunger,
Director-Licensing, MC 62A-1
PECO Energy Company
Nuclear Group Headquarters
Correspondence Control Desk
P.O. Box No. 195
Wayne, PA 19087-0195

SUBJECT: ISSUANCE OF AMENDMENTS - LIMERICK GENERATING STATION, UNITS 1 AND 2
(TAC NOS. M90983 AND M90984)

Dear Mr. Hunger:

The Commission has issued the enclosed 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. These amendments consist of changes to the Technical Specifications (TSs) in response to your application dated November 21, 1994, as supplemented by letters dated April 6, and July 3, 1995.

These amendments make changes affecting the Administrative Controls Section of the TSs. The areas proposed to be changed are Nuclear Effectiveness and Efficiency Design Study (NEEDS) Organization Title Changes; Minimum Shift Crew Composition; delete Independent Technical Review Section from TS; delete Nuclear Review Board (NRB) Review Section from TS; and delete NRB Audit Section from TS.

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

Docket Nos. 50-352/50-353

- Enclosures: 1. Amendment No. 96 to License No. NPF-39
Amendment No. 60 to License No. NPF-85
- 2. Safety Evaluation

cc w/encls: See next page

DISTRIBUTION:

Docket File	MO'Brien	CGrimes
PUBLIC	FRinaldi	SBlack
PDI-2 Reading	ACRS(4)	MSlosson
SVarga	OGC	OC/LFDCB
JZwolinski	OPA	CAnderson, RGN-I
JStolz	GHill(2)	

*Previously Concurred

OFC	:PDI-2/LA	:PDI-2/PM	:TQMB*	:HHFB*	:OGC*	:PDI-2/D	:
NAME	:MO'Brien	:FRinaldi	:SBlack	:MSlosson	:	:JStolz	:
DATE	:7/14/95	:6/14/95	:05/31/95	:05/31/95	:06/20/95	:7/14/95	:

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

July 18, 1995

Mr. George A. Hunger, Jr.
Director-Licensing, MC 62A-1
PECO Energy Company
Nuclear Group Headquarters
Correspondence Control Desk
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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

Docket Nos. 50-352/50-353

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

Limerick Generating Station,
Units 1 & 2

cc:

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

Mr. Rich R. Janati, Chief
Division of Nuclear Safety
PA Dept. of Environmental Resources
P. O. Box 8469
Harrisburg, Pennsylvania 17105-8469

Mr. David P. Helker, MC 62A-1
Manager-Limerick Licensing
PECO Energy Company
965 Chesterbrook Boulevard
Wayne, Pennsylvania 19087-5691

Mr. Michael P. Gallagher
Director - Site Engineering
Limerick Generating Station
P. O. Box A
Sanatoga, Pennsylvania 19464

Mr. Walter G. McFarland, Vice President
Limerick Generating Station
Post Office Box A
Sanatoga, Pennsylvania 19464

Mr. James L. Kantner
Manager-Experience Assessment
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. Ludwig E. Thibault
Senior Manager - 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

Dr. Judith Johnsrud
National Energy Committee
Sierra Club
433 Orlando Avenue
State College, PA 16803

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

Chairman
Board of Supervisors
of Limerick Township
646 West Ridge Pike
Linfield, PA 19468



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. 96
License No. NPF-39

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Philadelphia Electric Company (the licensee) dated November 21, 1994, as supplemented by letters dated April 6, and July 3, 1995, 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. 96, 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 and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

Donald J. Birken
for

John F. Stolz, 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: July 18, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 96

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.

<u>Remove</u>	<u>Insert</u>
xxvi	xxvi
xxvii	xxvii
6-1	6-1
6-2	6-2
6-3	6-3
6-5	6-5
6-6	6-6
6-7	6-7
6-9	6-9
6-10	6-10
6-11	6-11
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6-12a	6-12a
6-13	6-13

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6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

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

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

6.2 ORGANIZATION

6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organizational positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Limerick Quality Assurance Program.
- b. The Plant Manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. The Vice President, Limerick Generating Station shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

ADMINISTRATIVE CONTROLS

6.2.2 UNIT STAFF

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

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

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

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

ADMINISTRATIVE CONTROLS

UNIT STAFF (Continued)

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 Sr. Manager - Operations or an Operations Manager shall hold a Senior Reactor Operator License. |

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

WITH UNIT 2 IN CONDITION 4 OR 5 OR DEFUELED

POSITION	NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION	
	CONDITION 1, 2, or 3	CONDITION 4 OR 5
SM	1*	1*
SRO	2*	2*
RO	2	1
NLO	2	2**
STA	1***	None

WITH UNIT 2 IN CONDITION 1, 2, OR 3

POSITION	NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION	
	CONDITION 1, 2, or 3	CONDITION 4 or 5
SM	1*	1*
SRO	2*	2*
RO	2**	1
NLO	2**	1
STA	1*,***	None

TABLE NOTATIONS

- * Individual(s) may fill the same position on Unit 2.
- ** One of the two required individuals may fill the same position on Unit 2.
- ***The STA position may be filled by an on-shift SM or SRO provided the individual meets the 1985 NRC Policy Statement on Engineering Expertise on Shift.

SM - Shift Manager with a Senior Operator license on Unit 1.

SRO - Individual with a Senior Operator license on Unit 1.

RO - Individual with an Operator license on Unit 1.

NLO - Non-licensed operator properly qualified to support the unit to which assigned.

STA - Shift Technical Advisor

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

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

ADMINISTRATIVE CONTROLS

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

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 PROC 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 PORC Chairman or his designated alternate.

QUORUM

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

ADMINISTRATIVE CONTROLS

RESPONSIBILITIES (Continued)

- c. Provide written notification within 24 hours to the Vice President, Limerick Generating Station and the Nuclear Review Board of disagreement between the PORC and the Plant Manager; however, the Plant Manager shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1.

RECORDS

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

6.5.2 NUCLEAR REVIEW BOARD (NRB)

FUNCTION

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

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

The NRB shall report to and advise the Senior Vice President and Chief Nuclear Officer on those areas of responsibility pertaining to NRB Review and Audits.

COMPOSITION

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

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

ADMINISTRATIVE CONTROLS

ALTERNATES

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

CONSULTANTS

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

MEETING FREQUENCY

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

QUORUM

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

REVIEW

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

AUDITS

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

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ADMINISTRATIVE CONTROLS

RECORDS

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

- a. Minutes of each NRB meeting shall be prepared, approved, and forwarded to the Senior Vice President and Chief Nuclear Officer within 14 days following each meeting.
- b. Reports of Reviews shall be prepared, approved, and forwarded to the Senior Vice President and Chief Nuclear Officer within 14 days following completion of the review.
- c. Audit reports 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 Director or Manager designated by Administrative Procedures as the responsible Director or Manager 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 Director or Manager 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

6.5.3.3 If the responsible Director or Manager determines that a new program, procedure, or change thereto requires a 10 CFR 50.59 safety evaluation, the responsible Director or Manager 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 Director or Manager 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 Director or Manager designated by Administrative Procedures as the responsible Director or Manager for that procedure within 14 days of implementation.



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. 60
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 November 21, 1994, as supplemented by letters dated April 6, and July 3, 1995, 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.

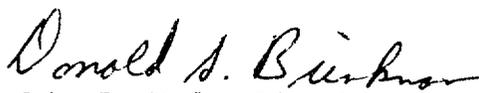
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-85 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 60, 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 and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION


for John F. Stolz, 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: July 18, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 60

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.

<u>Remove</u>	<u>Insert</u>
xxvi	xxvi
xxvii	xxvii
6-1	6-1
6-2	6-2
6-3	6-3
6-5	6-5
6-6	6-6
6-7	6-7
6-9	6-9
6-10	6-10
6-11	6-11
6-12	6-12
6-12a	6-12a
6-13	6-13

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6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

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

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

6.2 ORGANIZATION

6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organizational positions. These relationships shall be documented and updated, as appropriate, in the form of organizational charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Limerick Quality Assurance Program.
- b. The Plant Manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. The Vice President, Limerick Generating Station shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

6.2.2 UNIT STAFF

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

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

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
2. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time.

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

ADMINISTRATIVE CONTROLS

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 Sr. Manager - Operations or an Operations Manager shall hold a Senior Reactor Operator License.

TABLE 6.2.2-1

MINIMUM SHIFT CREW COMPOSITION

TWO UNITS WITH A COMMON CONTROL ROOM

<u>WITH UNIT 1 IN CONDITION 4 OR 5 OR DEFUELED</u>		
<u>POSITION</u>	<u>NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION</u>	
	<u>CONDITION 1, 2, or 3</u>	<u>CONDITION 4 OR 5</u>
SM	1*	1*
SRO	2*	2*
RO	2	1
NLO	2	2**
STA	1***	None

<u>WITH UNIT 1 IN CONDITION 1, 2, OR 3</u>		
<u>POSITION</u>	<u>NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION</u>	
	<u>CONDITION 1, 2, or 3</u>	<u>CONDITION 4 or 5</u>
SM	1*	1*
SRO	2*	2*
RO	2**	1
NLO	2**	1
STA	1*,***	None

TABLE NOTATIONS

- * Individual(s) may fill the same position on Unit 1.
- ** One of the two required individuals may fill the same position on Unit 1.
- ***The STA position may be filled by an on-shift SM or SRO provided the individual meets the 1985 NRC Policy Statement on Engineering Expertise on Shift.
- SM - Shift Manager with a Senior Operator license on Unit 2.
- SRO - Individual with a Senior Operator license on Unit 2.
- RO - Individual with an Operator license on Unit 2.
- NLO - Non-licensed operator properly qualified to support the unit to which assigned.
- STA - Shift Technical Advisor

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

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

ADMINISTRATIVE CONTROLS

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

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.

ADMINISTRATIVE CONTROLS

RESPONSIBILITIES (Continued)

- c. Provide written notification within 24 hours to the Vice President, Limerick Generating Station and the Nuclear Review Board of disagreement between the PORC and the Plant Manager; however, the Plant Manager shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1.

RECORDS

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

6.5.2 NUCLEAR REVIEW BOARD (NRB)

FUNCTION

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

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

The NRB shall report to and advise the Senior Vice President and Chief Nuclear Officer on those areas of responsibility pertaining to NRB Review and Audits.

COMPOSITION

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

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

ADMINISTRATIVE CONTROLS

ALTERNATES

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

CONSULTANTS

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

MEETING FREQUENCY

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

QUORUM

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

REVIEW

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

AUDITS

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

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ADMINISTRATIVE CONTROLS

RECORDS

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

- a. Minutes of each NRB meeting shall be prepared, approved, and forwarded to the Senior Vice President and Chief Nuclear Officer within 14 days following each meeting.
- b. Reports of Reviews shall be prepared, approved, and forwarded to the Senior Vice President and Chief Nuclear Officer within 14 days following completion of the review.
- c. Audit reports 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 Director or Manager designated by Administrative Procedures as the responsible Director or Manager 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 Director or Manager 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

6.5.3.3 If the responsible Director or Manager determines that a new program, procedure, or change thereto requires a 10 CFR 50.59 safety evaluation, the responsible Director or Manager 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 Director or Manager 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.

ADMINISTRATIVE CONTROLS

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 Director or Manager designated by Administrative Procedures as the responsible Director or Manager for that procedure within 14 days of implementation.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 96 AND 60 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 November 21, 1994, as supplemented by letters dated April 6, and July 3, 1995, the Philadelphia Electric Company (the licensee, or PECO) submitted a request for changes to the Limerick Generating Station (LGS), Units 1 and 2, Technical Specifications (TS). The changes would affect the Administrative Control Section of the Technical Specifications (TS) in the following areas: (1) Nuclear Effectiveness and Efficiency Design Study (NEEDS) Organization Title Changes (TS Change Request 93-12-0); (2) Minimum Shift Crew Composition (TS Change Request 94-46-0); (3) delete Independent Technical Review Section from TS (TS Change Request 94-51-0); (4) delete Nuclear Review Board (NRB) Review Section from TS (TS Change Request 94-52-0); and (5) delete NRB Audit Section from TS (TS Change Request 94-53-0).

TS Change 93-12-0 includes the elimination of specific position titles for the Plant Operations and Review Committee (PORC) in order to allow the Plant Manager to appoint any appropriately qualified member of the plant staff as a PORC member and the elimination of the Assistant Superintendent - Operations position. TS Change Request 94-46-0 involves revising TS Section 6.2.2, "Unit Staff," to reflect changes in the shift crew composition. TS Change 94-51-0 requested the deletion of ISEG and relocates its function to the Quality Assurance organization. TS Changes 94-52-0 and 94-53-0 address the deletion of the NRB's review and auditing responsibilities.

2.0 BACKGROUND ON RELOCATION OF TS TO UFSAR

Section 182a of the Atomic Energy Act (the "Act") requires applicants for nuclear power plant operating licenses to include TS as part of the license. The Commission's regulatory requirements related to the content of TS are set forth in 10 CFR 50.36. That regulation requires that the TS include items in five specific categories, including (1) safety limits, limiting safety system settings and limiting control settings; (2) limiting conditions for operation; (3) surveillance requirements; (4) design features; and (5) administrative controls. However, the regulation does not specify the particular requirements to be included in a plant's TS.

The Commission has provided guidance for the contents of TS in its "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" ("Final Policy Statement"), 58 FR 39132 (July 22, 1993), in which the Commission indicated that compliance with the Final Policy Statement satisfies Section 182a of the Act. In particular, the Commission indicated that certain items could be relocated from the TS to licensee-controlled documents, consistent with the standard enunciated in *Portland General Electric Co.* (Trojan Nuclear Plant), ALAB-531, 9 NRC 263, 273 (1979). In that case, the Atomic Safety and Licensing Appeal Board indicated that "technical specifications are to be reserved for those matters as to which the imposition of rigid conditions or limitations upon reactor operation is deemed necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety."

Consistent with this approach, the Final Policy Statement identified four criteria to be used in determining whether a particular matter is required to be included in the TS, as follows:

- (1) Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary;
- (2) a process variable, design feature, or operating restriction that is an initial condition of a Design Basis Accident or Transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier;
- (3) a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a Design Basis Accident or Transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier;
- (4) a structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety.¹

As a result, existing TS requirements which fall within or satisfy any of the criteria in the Final Policy Statement must be retained in the TS, while those TS requirements which do not fall within or satisfy these criteria may be relocated to other, licensee-controlled documents.

¹ The Commission recently promulgated a proposed change to 10 CFR 50.36, pursuant to which the rule would be amended to codify and incorporate these criteria (59 FR 48180). The Commission's Final Policy Statement specified that only limiting conditions for Reactor Core Isolation Cooling, Isolation Condenser, Residual Heat Removal, Standby Liquid Control, and Recirculation Pump Trip meet the guidance for inclusion in the TS under Criterion 4 (58 FR at 39137). The Commission has solicited public comments on the scope of Criterion 4, in the pending rulemaking.

3.0 EVALUATION

PECO requested changes to the Administrative Controls Section of the TS for LGS, Units 1 & 2. These TS changes address title changes, shift crew composition, composition of PORC and the relocation of certain review and audit requirements to the LGS, Units 1 & 2, Updated Final Safety Analysis Report (UFSAR). Also, the licensee has requested changes to their Quality Assurance Program Description (QAPD), that are complementary to the TS changes. The QAPD changes are with respect to audit frequencies and the Independent Safety Engineering Group (ISEG).

3.1 TS Change Request 93-12-0,

TS Change Request 93-12-0, "NEEDS Organization Title Changes," involves revising TS Section 6.0, "Administrative Controls," to reflect revised position titles resulting from PECO implementation of the NEEDS recommendations.

Specifically, PECO proposes to delete specific titles in TS Section 6.5.1.2 that describe the PORC membership by title, and replace that with a description of PORC membership that states that it is composed of nine regular members from the Limerick staff that have experience in plant operations, engineering, maintenance, instrument and controls, planning, radiation safety, chemistry, and experience assessment. These members shall meet the requirements of American National Standards Institute/American Nuclear Society (ANSI/ANS) 3.1-1978, Section 4.7 for the applicable experience and be appointed in writing by the Plant Manager.

These new position titles describe essentially equivalent management and supervisory positions that existed prior to implementing the NEEDS recommendations. TS Section 6.3.1 will continue to require the individuals filling these positions to meet the recommendations specified in ANSI/ANS 3.1-1978, "Selection, Qualification and Training of Personnel in Nuclear Power Plants." This proposed change eliminates the designation of PORC members by specific position titles, and allows the Plant Manager to appoint any appropriately qualified member of the plant staff as a PORC member. The PORC quorum remains the same, and the membership continues to be required to meet the requirements of Section 4.7 of ANSI/ANS 3.1-1978. In addition, this proposed change eliminates the Assistant Superintendent - Operations position. In order to comply with the requirements regarding Senior Reactor Operator (SRO) licenses for operations management personnel, TS 6.2.2.g will specify that the Senior Manager - Operations or the Operations Manager shall hold an SRO license.

The staff finds that the licensee's TS Change Request 93-12-0 for the LGS regarding plant management positions, and position titles staffing are consistent with the recommendations of Regulatory Guide (RG) 1.8, "Personnel Selection and Training," Rev. 2, and ANSI/ANS 3.1-1978, "Selection, Qualification and Training of Personnel in Nuclear Power Plants." These changes ensure there remains site-specific, detailed, relevant technical and

systems knowledge in senior operations management. Consequently, the staff finds these changes acceptable as they meet the applicable acceptance criteria of Sections 13.1.1, 13.1.2, 13.1.3 and 13.4 of NUREG 0800, Rev.2, the Standard Review Plan and conform to the Improved Standard Technical Specifications (ISTS).

3.2 TS Change Request 94-46-0

TS Change Request 94-46-0 proposes the following: 1) add a third licensed Senior Reactor Operator (SRO) to the shift crew, 2) change the position title of the lead on-shift supervising SRO (the Shift Superintendent or the Shift Supervisor) from Shift Supervision (SS) to Shift Manager (SM), and 3) clarify who may fill the Shift Technical Advisor (STA) position by revising the Table 6.2.2-1 note to indicate that the STA position may be filled by one of the qualified on-shift SROs.

Adding an additional SRO to the shift crew will provide adequate operation of the facility, adequate response in the event of an accident condition, and proper implementation of the applicable plant procedures. The minimum shift crew composition is established in 10 CFR 50.54(m) and stated in the Standard TS. The original LGS, Units 1 & 2, TS were consistent with these requirements and specified 1 SS, 1 SRO, and an STA to be included on each shift. By letter dated November 15, 1993, the NRC issued Facility Operating License Amendment Nos. 64 and 29 which permitted the STA position to be filled by the on-shift Shift Superintendent, Shift Supervisor, or other SRO, provided that the individual met the qualifications in the 1985 NRC Policy Statement on Engineering Expertise on Shift. This allowed one of the two on-shift SROs to satisfy the STA requirement. As a result, the minimum on-shift crew composition for SROs could be met with only two qualified individuals.

The licensee did not implement this interpretation. The on-shift crew composition required in the licensee's Administrative Procedure, A-7, was revised to include three SROs consisting of one Shift Superintendent, one Shift Supervisor, and one Shift Supervisor who also meets the qualifications of the STA position (SRO/STA). The proposed TS change revises the TS for the minimum on-shift crew to include a Shift Manager (formerly the Shift Supervision in the form of the Shift Superintendent or the Shift Supervisor) and two SROs with the STA position able to be filled by an STA qualified SM or SRO.

The staff finds that the licensee's TS Change Request 94-46-0 for the LGS regarding plant on-shift staffing is consistent with the requirements of 10 CFR 50.54(m), RG 1.8, "Personnel Selection and Training," Rev. 2. and ANSI/ANS 3.1-1978, "Selection, Qualification and Training of Personnel in Nuclear Power plants." These changes ensure there remains site-specific, detailed, relevant technical and systems knowledge in senior operations management. Consequently, the staff finds these changes acceptable as they meet the applicable acceptance criteria of Sections 13.1.2-13.1.3 of NUREG 0800, Rev.2, the Standard Review Plan, and conform to the Improved Standard Technical Specifications (ISTS).

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.

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 TS 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 (3.1), 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 TS 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 delete from Section 17.2.18.6, the listing of specific assessments. The staff finds this change acceptable as this detailed listing is not required to be in the QAPD. 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.

The staff agrees that specification of a maximum 24-month interval for the specified audits is acceptable because it will allow the licensee to perform audit scheduling according to safety significance and in response to performance data trends while ensuring that the audits are performed within a specified interval.

TS Page 6-3 for both units was changed to reflect "an" Operations Manager instead of "the" Operations Manager to agree with the licensee's incoming.

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 Contributors: J. Arildsen
F. Allenspach
L. Campbell
F. Rinaldi

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