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Posted
Amdt. 122
to DPR-56

July 9, 1986

Dockets Nos. 50-277
and 50-278

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FOB, Vassallo
LFMB
JPartlow
SNorris
GGears
Gray File
HThompson
EButcher

(See Correction letter of 8-13-86)

Mr. Edward G. Bauer, Jr.
Vice President and General Counsel
Philadelphia Electric Company
2301 Market Street
Philadelphia, Pennsylvania 19101

Dear Mr. Bauer:

The Commission has issued the enclosed Amendments Nos. 118 and 122 to Facility Operating Licenses Nos. DPR-44 and DPR-56 for the Peach Bottom Atomic Power Station, Units Nos. 2 and 3. These amendments consist of changes to the Technical Specifications (TSs) in partial response to your application dated November 18, 1985.

The approved changes to the TSs would permit certain changes regarding plant organization as specified in Section 6 (Administrative Controls) and revised organization charts as requested. Two of the proposed changes are still under review by the NRC staff. These changes were identified in your application as Items (6) and (10). The type of change proposed in Item (6) is currently under review by the Commission's Technical Specification Improvement Program. We will inform you of the status of this program shortly. Concerning Item (10) of your submittal, we are continuing discussions with your staff in order to resolve and clarify certain outstanding issues in your proposal.

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

Sincerely,

Original signed by/

Gerald E. Gears, Project Manager
BWR Project Directorate #2
Division of BWR Licensing

Enclosures:
1. Amendment No. 118 to DPR-44
2. Amendment No. 122 to DPR-56
3. Safety Evaluation

cc w/enclosures:
See next page

BWR:PD#2	BWR:PD#2	BWR:PD#2	OELD
for SNorris	GGears;rs	DMuller	
6/30/86	6/30/86	6/30/86	7/1/86

Mr. E. G. Bauer, Jr.
Philadelphia Electric Company

Peach Bottom Atomic Power Station,
Units 2 and 3

cc:
Mr. Eugene J. Bradley
Assistant General Counsel
Philadelphia Electric Company
2301 Market Street
Philadelphia, Pennsylvania 19101

Troy B. Conner, Jr., Esq.
1747 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

Thomas A. Deming, Esq.
Assistant Attorney General
Department of Natural Resources
Annapolis, Maryland 21401

Mr. R. Fleischmann, II, Manager
Peach Bottom Atomic Power Station
RD #1
Delta, Pennsylvania 17314

Mr. G. M. Leitch, Superintendent
Nuclear Generation Division
S7-1
Philadelphia Electric Company
2301 Market Street
Philadelphia, Pennsylvania 19101

Mr. Anthony J. Pietrofitta, General Manager
Power Production Engineering
Atlantic Electric
P. O. Box 1500
1199 Black Horse Pike
Pleasantville, New Jersey 08232

Resident Inspector
U.S. Nuclear Regulatory Commission
Peach Bottom Atomic Power Station
P.O. Box 399
Delta, Pennsylvania 17314

Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pennsylvania 19406

Mr. R. A. Heiss, Coordinator
Pennsylvania State Clearinghouse
Governor's Office of State Planning
and Development
P.O. Box 1323
Harrisburg, Pennsylvania 17120

Mr. Thomas M. Gerusky, Director
Bureau of Radiation Protection
Pennsylvania Department of
Environmental Resources
P.O. Box 2063
Harrisburg, Pennsylvania 17120

Mr. Albert R. Steel, Chairman
Board of Supervisors
Peach Bottom Township
R. D. #1
Delta, Pennsylvania 17314

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

PHILADELPHIA ELECTRIC COMPANY
PUBLIC SERVICE ELECTRIC AND GAS COMPANY
DELMARVA POWER AND LIGHT COMPANY
ATLANTIC CITY ELECTRIC COMPANY

DOCKET NO. 50-277

PEACH BOTTOM ATOMIC POWER STATION, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 118
License No. DPR-44

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Philadelphia Electric Company, et al. (the licensee) dated November 18, 1985, 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. DPR-44 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 118, are hereby incorporated in the license. PECO shall operate the facility in accordance with the Technical Specifications.

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

FOR THE NUCLEAR REGULATORY COMMISSION

Daniel R. Muller, Director
BWR Project Directorate #2
Division of BWR Licensing

Attachment:
Changes to the Technical
Specifications

Date of Issuance: July 9, 1986

ATTACHMENT TO LICENSE AMENDMENT NO. 118

FACILITY OPERATING LICENSE NO. DPR-44

DOCKET NO. 50-277

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.

Remove	Insert
243	243
244	244
245	245
246	246
247	247
248	248
254	254
Appendix "B" Technical Specifications	
53	53

6.0 ADMINISTRATIVE CONTROLS

6.1 Responsibility

6.1.1 The Manager - Nuclear Plant shall be responsible for overall facility operation. In the absence of the Manager - Nuclear Plant, the Superintendent - Operations (or any other person that the Manager - Nuclear Plant may designate in writing) shall assume the Manager's responsibility for overall facility operation.

6.2 Organization

6.2.1 Offsite

The offsite organization for facility management and technical support shall be as shown on Figure 6.2-1.

6.2.2 Facility Staff

The facility organization shall be as shown on Figure 6.2-2 and:

a. Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Figure 6.2-2, except that the shift crew composition may be less than the minimum requirements 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.

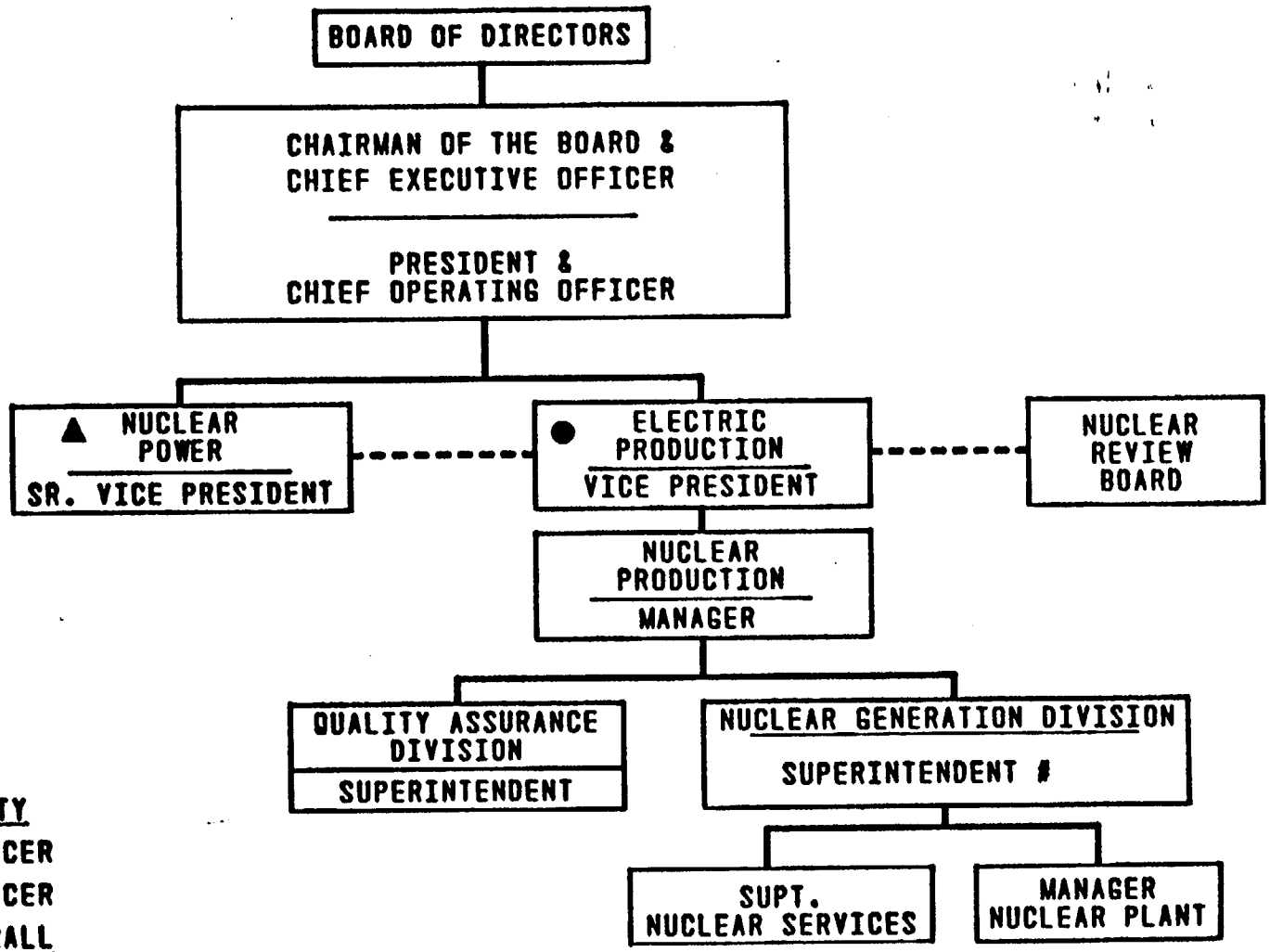
b. At least one licensed operator shall be in the control room and assigned to each reactor that contains fuel.

c. At least two licensed operators, excluding the operator on the second unit, shall be present in the control room during reactor startup, scheduled reactor shutdown and during recovery from reactor trips.

d. An individual qualified in radiation protection procedures shall be onsite when fuel is in the reactor.

e. All CORE ALTERATIONS shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibility during this operation.

f. A Fire Brigade of at least 5 members shall be maintained onsite at all times. The Fire Brigade shall not include the minimum shift crew necessary for safe shutdown of the unit(s) (3 members) or any personnel required for other essential functions during a fire emergency.



REPORTING RESPONSIBILITY

▲ CHIEF EXECUTIVE OFFICER

● CHIEF OPERATING OFFICER

RESPONSIBLE FOR OVERALL FIRE PROTECTION PROGRAM

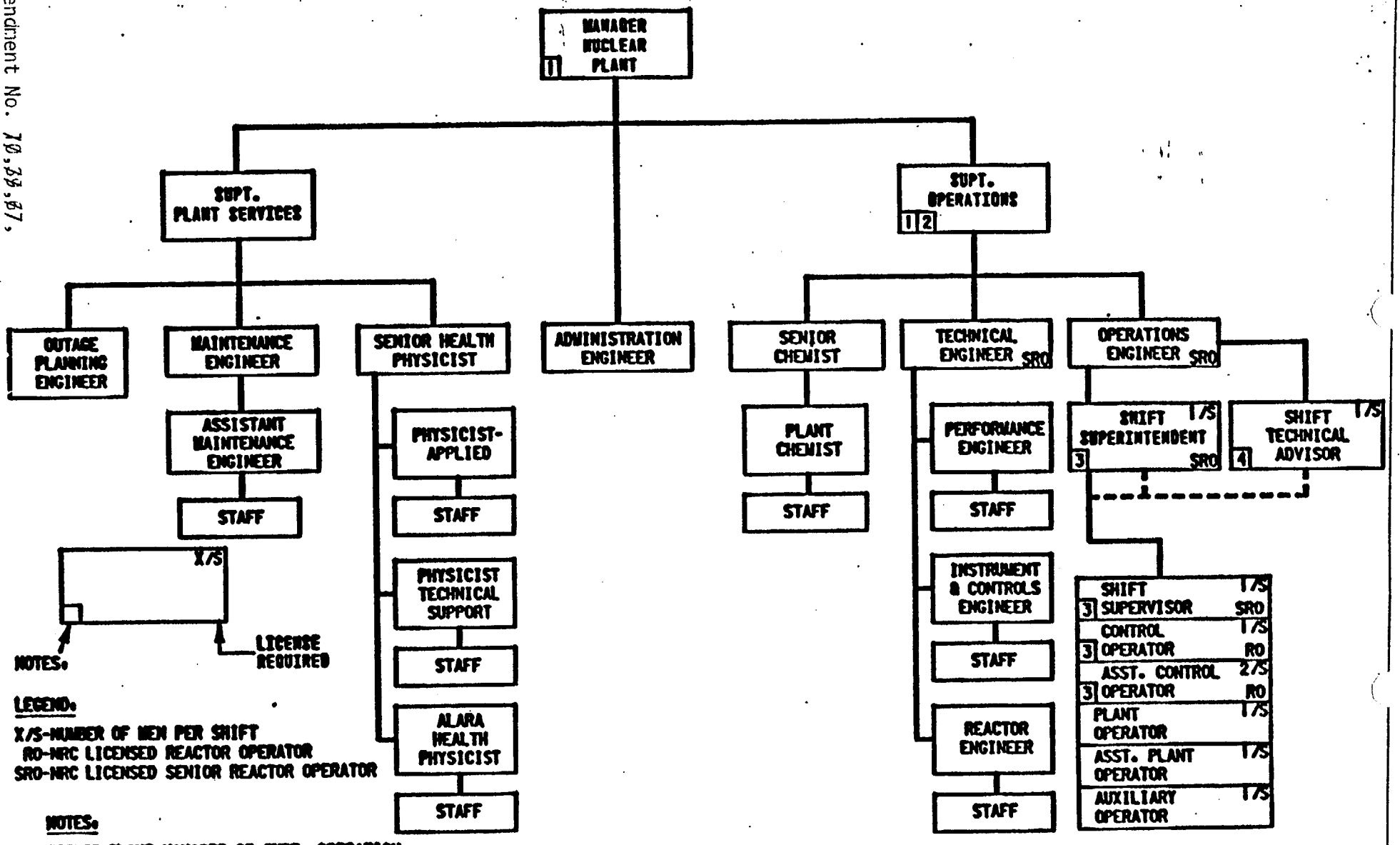
MANAGEMENT ORGANIZATION CHART

PHILADELPHIA ELECTRIC COMPANY

PEACH BOTTOM ATOMIC POWER STATION - UNITS 2 AND 3

FIGURE 6.2-1

Amendment No. 70,89,87, 74,94, 118



LEGEND.

X/S-NUMBER OF MEN PER SHIFT
RO-NRC LICENSED REACTOR OPERATOR
SRO-NRC LICENSED SENIOR REACTOR OPERATOR

NOTES.

1. EITHER PLANT MANAGER OR SUPT. OPERATION SHALL HOLD AN SRO LICENSE.
2. ASSUMES DUTIES OF PLANT MANAGER IN HIS ABSENCE
3. ONE SRO & TWO RO PER SHIFT PERMITTED WHEN BOTH UNITS ARE IN THE SHUTDOWN OR REFUEL MODE
4. NOT APPLICABLE TO THE UNIT IN THE SHUTDOWN OR REFUEL MODE

FIGURE 6.2-2
ORGANIZATION FOR CONDUCT OF PLANT OPERATIONS
PEACH BOTTOM ATOMIC POWER STATION

6.3 Facility Staff Qualification

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1 - 1971 for comparable positions, except for (1) Senior Health Physicist (radiation protection manager) who shall meet or exceed the qualifications of Regulatory Guide 1.8, September, 1975 and (2) the Shift Technical Advisor who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.

6.4 Training

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Manager - Nuclear Plant and shall meet the requirements of Section 5.5 of ANSI N18.1-1971 and 10 CFR 55, Appendix A.

6.4.2 A training program for the Fire Brigade shall be conducted such that Fire Brigade members complete an instruction program within a two year period. Regularly planned meetings will be held every 3 months.

6.5 Review and Audit

6.5.1 Plant Operation Review Committee (PORC)

Function

6.5.1.1 The Plant Operation Review Committee shall function to advise the Manager - Nuclear Plant on all matters related to nuclear safety.

Composition

6.5.1.2 The Plant Operation Review Committee shall be composed of the:

Manager - Nuclear Plant (Chairman)	Operations Engineer
Superintendent - Operations	Outage Planning Engineer
Superintendent - Plant Services	Senior Health Physicist
Technical Engineer	Senior Chemist
Maintenance Engineer	Shift Superintendent

Alternates

6.5.1.3 Alternate members shall be appointed in writing by the PORC Chairman to serve on a temporary basis; however, no more than two alternate members shall be used to satisfy a PORC quorum (See 6.5.1.5).

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(s).

Quorum

6.5.1.5 A quorum of the PORC necessary for the performance of the PORC responsibilities and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate(s) and four members or their alternates.

Responsibilities

6.5.1.6 The Plant Operation Review Committee shall be responsible for:

a. Review of 1) all procedures required by Specification 6.8 and changes thereto, 2) any other proposed procedures or changes thereto as determined by Manager - Nuclear Plant to affect nuclear safety.

b. Review of all proposed tests and experiments that affect nuclear safety.

c. Review of all proposed changes to the Technical Specifications.

d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.

e. Investigation of all violations of the Technical Specifications and shall prepare and forward a report covering evaluation and recommendations to prevent recurrence to the Superintendent, Nuclear Generation Division, and the Chairman of the Nuclear Review Board.

f. Review of facility operations to detect potential safety hazards.

g. Performance of special reviews and investigations and reports thereon as requested by the Chairman of the Nuclear Review Board.

h. Review of all reportable events required by 10 CFR 50.73.

6.5.1.6 Continued

h. Review of the Plant Security Plan and implementing procedures, and shall submit recommended changes to the Plan to the Chairman of the Nuclear Review Board.

i. Review of the Emergency Plan and implementing procedures, and shall submit recommended changes to the Plan to the Chairman of the Nuclear Review Board.

j. Review of every unplanned release reportable under 6.9.2.b.(5) of radioactive material to the environs; evaluate the event; specify remedial action to prevent recurrence; and document the event description, evaluation, and corrective action and the disposition of the corrective action in the plant records.

Authority

6.5.1.7 The Plant Operation Review Committee shall:

a. Recommend to the Manager - Nuclear Plant, written approval or disapproval of items considered under 6.5.1.6(a) through (d) above.

b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6(a) through (e) above constitutes an unreviewed safety question, as defined in 10 CFR 50.59.

c. Provide immediate written notification to the Superintendent, Nuclear Generation Division, or in his absence, the Superintendent, Nuclear Services, and the Nuclear Review Board of disagreement between the PORC and the Manager - Nuclear Plant; however, the Manager-Nuclear Plant shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

.8.2 Each procedure and administrative policy of 6.8.1 above, and changes thereto, shall be reviewed in accordance with Specification 6.5.1.6 and shall be approved by the Manager - Nuclear Plant or his designated alternate per Specification 6.1.1, prior to implementation, and reviewed periodically as set forth in administrative procedures.

6.8.3 Temporary changes to procedures of 6.8.1 above may be made, provided:

a. The intent of the original procedure is not altered.

b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.

c. The change is documented, reviewed by the PORC and approved by the Manager - Nuclear Plant within 14 days of implementation.

6.8.4 Written procedures shall be established, implemented and maintained covering the activities of the radiological effluent technical specifications as referenced below:

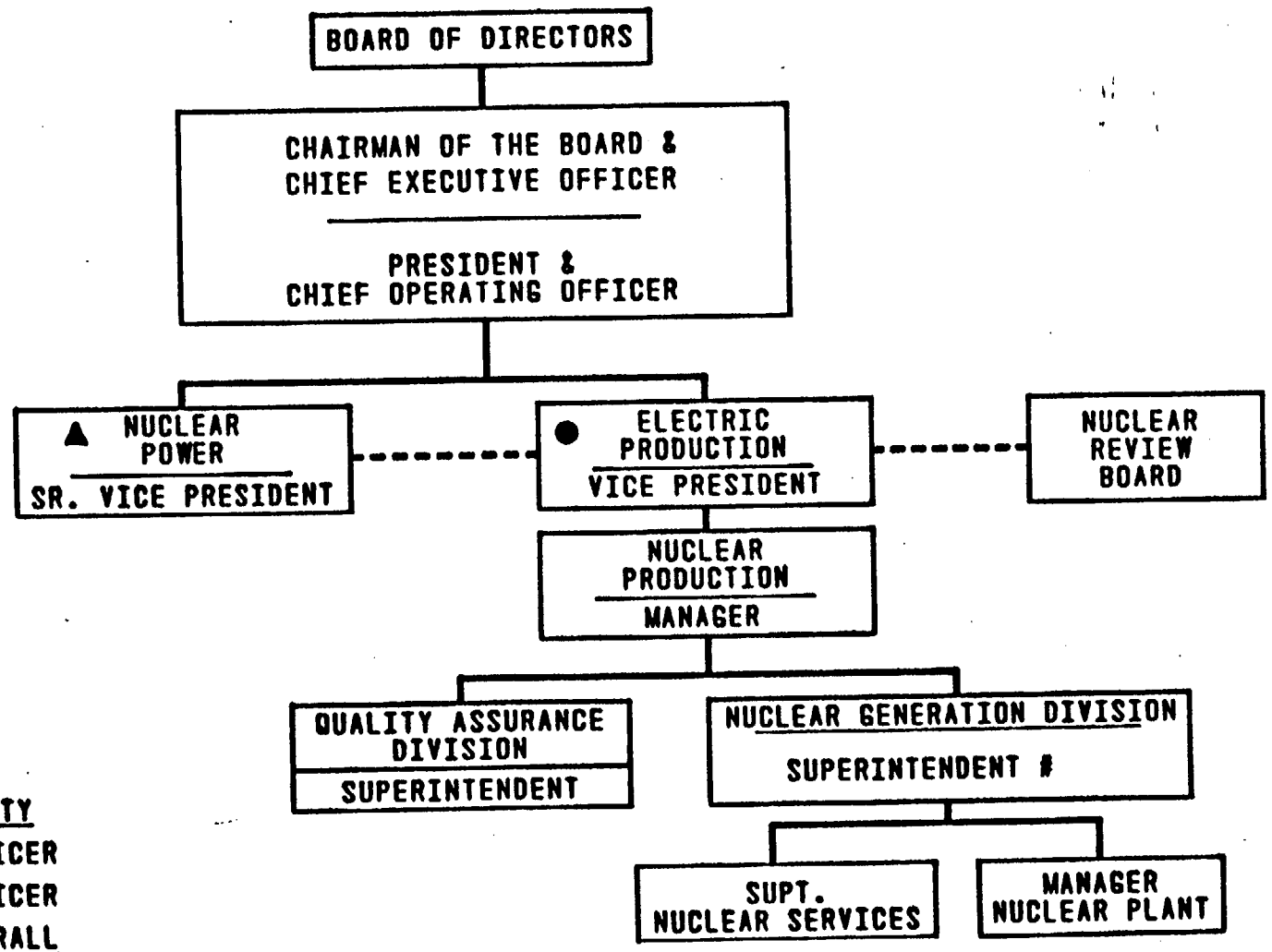
a. Offsite Dose Calculation Manual

b. Quality Assurance Program for the environmental monitoring using the guidance in Regulatory Guide 4.1, Revision 1, April 1975.

6.9 <u>Reporting Requirements</u>

In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following identified reports shall be submitted to the Administrator of the appropriate Regional Office unless otherwise noted.

Amendment No. 72,87,97,102,118
Collection letter of 8-13-86



REPORTING RESPONSIBILITY

▲ CHIEF EXECUTIVE OFFICER

● CHIEF OPERATING OFFICER

RESPONSIBLE FOR OVERALL FIRE PROTECTION PROGRAM

MANAGEMENT ORGANIZATION CHART

PHILADELPHIA ELECTRIC COMPANY

PEACH BOTTOM ATOMIC POWER STATION - UNITS 2 AND 3

FIGURE 7.1-1

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

PHILADELPHIA ELECTRIC COMPANY
PUBLIC SERVICE ELECTRIC AND GAS COMPANY
DELMARVA POWER AND LIGHT COMPANY
ATLANTIC CITY ELECTRIC COMPANY

DOCKET NO. 50-278

PEACH BOTTOM ATOMIC POWER STATION, UNIT NO. 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 122
License No. DPR-56

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Philadelphia Electric Company, et al. (the licensee) dated November 18, 1985, 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. DPR-56 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 122, are hereby incorporated in the license. PECO shall operate the facility in accordance with the Technical Specifications.

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

FOR THE NUCLEAR REGULATORY COMMISSION

Daniel R. Muller, Director
BWR Project Directorate #2
Division of BWR Licensing

Attachment:
Changes to the Technical
Specifications

Date of Issuance: July 9, 1986

ATTACHMENT TO LICENSE AMENDMENT NO. 122

FACILITY OPERATING LICENSE NO. DPR-56

DOCKET NO. 50-278

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.

Remove	Insert
243	243
244	244
245	245
246	246
247	247
248	248
254	254
Appendix "B" Technical Specifications	
53	53

6.0 ADMINISTRATIVE CONTROLS

6.1 Responsibility

6.1.1 The Manager - Nuclear Plant shall be responsible for overall facility operation. In the absence of the Manager - Nuclear Plant, the Superintendent - Operations (or any other person that the Manager - Nuclear Plant may designate in writing) shall assume the Manager's responsibility for overall facility operation.

6.2 Organization

6.2.1 Offsite

The offsite organization for facility management and technical support shall be as shown on Figure 6.2-1.

6.2.2 Facility Staff

The facility organization shall be as shown on Figure 6.2-2 and:

a. Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Figure 6.2-2, except that the shift crew composition may be less than the minimum requirements 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.

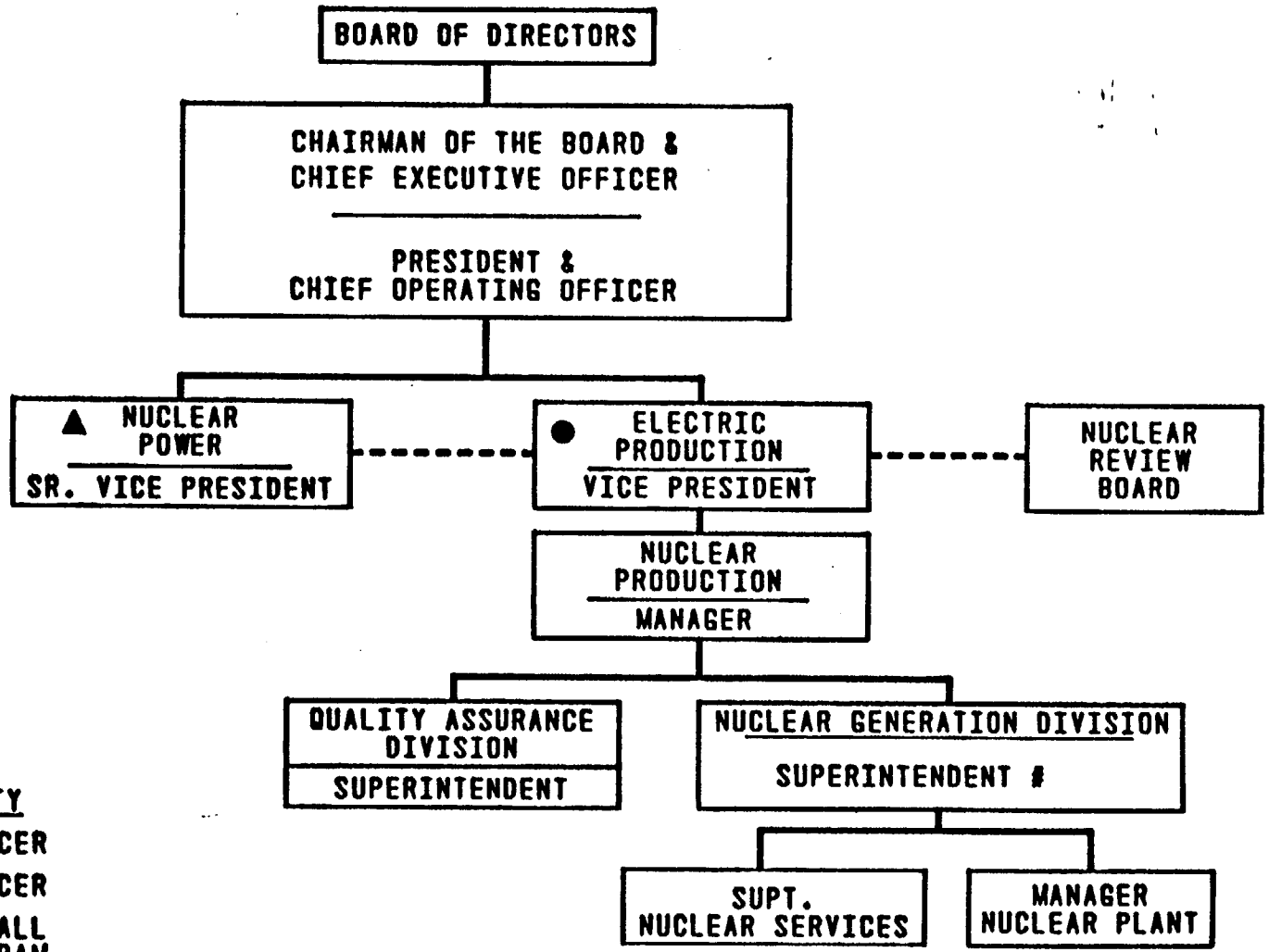
b. At least one licensed operator shall be in the control room and assigned to each reactor that contains fuel.

c. At least two licensed operators, excluding the operator on the second unit, shall be present in the control room during reactor startup, scheduled reactor shutdown and during recovery from reactor trips.

d. An individual qualified in radiation protection procedures shall be onsite when fuel is in the reactor.

e. All CORE ALTERATIONS shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibility during this operation.

f. A Fire Brigade of at least 5 members shall be maintained onsite at all times. The Fire Brigade shall not include the minimum shift crew necessary for safe shutdown of the unit(s) (3 members) or any personnel required for other essential functions during a fire emergency.



REPORTING RESPONSIBILITY

▲ CHIEF EXECUTIVE OFFICER

● CHIEF OPERATING OFFICER

RESPONSIBLE FOR OVERALL FIRE PROTECTION PROGRAM

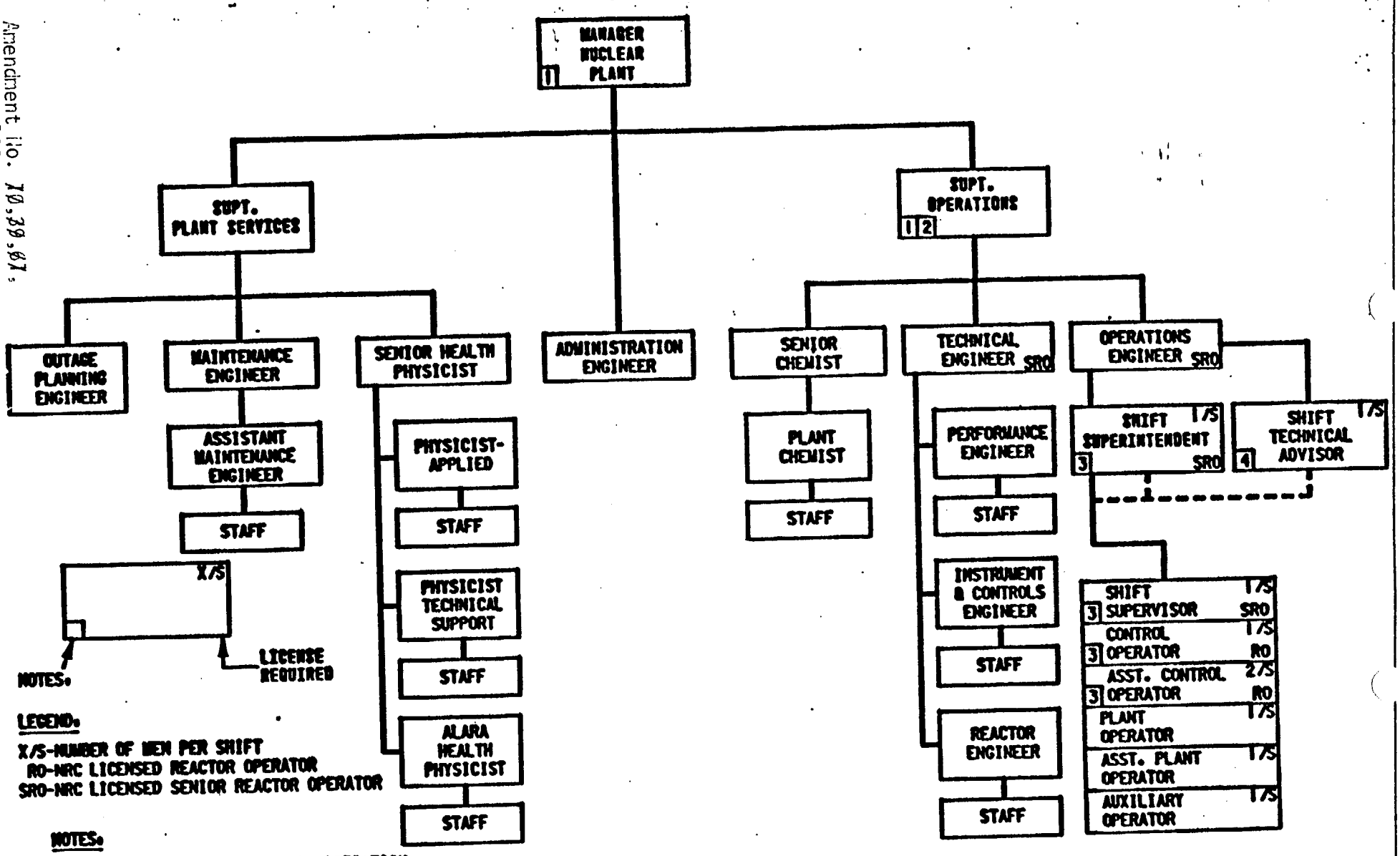
MANAGEMENT ORGANIZATION CHART

PHILADELPHIA ELECTRIC COMPANY

PEACH BOTTOM ATOMIC POWER STATION - UNITS 2 AND 3

FIGURE 6.2-1

Amendment No. 10, 39, 61, 73, 90, 122



LEGEND.

X/S-NUMBER OF MEN PER SHIFT
RO-NRC LICENSED REACTOR OPERATOR
SRO-NRC LICENSED SENIOR REACTOR OPERATOR

NOTES.

1. EITHER PLANT MANAGER OR SUPT. OPERATION SHALL HOLD AN SRO LICENSE.
2. ASSUMES DUTIES OF PLANT MANAGER IN HIS ABSENCE
3. ONE SRO & TWO RO PER SHIFT PERMITTED WHEN BOTH UNITS ARE IN THE SHUTDOWN OR REFUEL MODE
4. NOT APPLICABLE TO THE UNIT IN THE SHUTDOWN OR REFUEL MODE

FIGURE 6.2-2
ORGANIZATION FOR CONDUCT OF PLANT OPERATIONS
PEACH BOTTOM ATOMIC POWER STATION

6.3 Facility Staff Qualification

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1 - 1971 for comparable positions, except for (1) Senior Health Physicist (radiation protection manager) who shall meet or exceed the qualifications of Regulatory Guide 1.8, September, 1975 and (2) the Shift Technical Advisor who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.

6.4 Training

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Manager - Nuclear Plant and shall meet the requirements of Section 5.5 of ANSI N18.1-1971 and 10 CFR 55, Appendix A.

6.4.2 A training program for the Fire Brigade shall be conducted such that Fire Brigade members complete an instruction program within a two year period. Regularly planned meetings will be held every 3 months.

6.5 Review and Audit

6.5.1 Plant Operation Review Committee (PORC)

Function

6.5.1.1 The Plant Operation Review Committee shall function to advise the Manager - Nuclear Plant on all matters related to nuclear safety.

Composition

6.5.1.2 The Plant Operation Review Committee shall be composed of the:

Manager - Nuclear Plant (Chairman)	Operations Engineer
Superintendent - Operations	Outage Planning Engineer
Superintendent - Plant Services	Senior Health Physicist
Technical Engineer	Senior Chemist
Maintenance Engineer	Shift Superintendent

Alternates

6.5.1.3 Alternate members shall be appointed in writing by the PORC Chairman to serve on a temporary basis; however, no more than two alternate members shall be used to satisfy a PORC quorum (See 6.5.1.5).

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(s).

Quorum

6.5.1.5 A quorum of the PORC necessary for the performance of the PORC responsibilities and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate(s) and four members or their alternates.

Responsibilities

6.5.1.6 The Plant Operation Review Committee shall be responsible for:

a. Review of 1) all procedures required by Specification 6.8 and changes thereto, 2) any other proposed procedures or changes thereto as determined by Manager - Nuclear Plant to affect nuclear safety.

b. Review of all proposed tests and experiments that affect nuclear safety.

c. Review of all proposed changes to the Technical Specifications.

d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.

e. Investigation of all violations of the Technical Specifications and shall prepare and forward a report covering evaluation and recommendations to prevent recurrence to the Superintendent, Nuclear Generation Division, and the Chairman of the Nuclear Review Board.

f. Review of facility operations to detect potential safety hazards.

g. Performance of special reviews and investigations and reports thereon as requested by the Chairman of the Nuclear Review Board.

h. Review of all reportable events required by 10 CFR 50.73.

6.5.1.6 Continued

h. Review of the Plant Security Plan and implementing procedures, and shall submit recommended changes to the Plan to the Chairman of the Nuclear Review Board.

i. Review of the Emergency Plan and implementing procedures, and shall submit recommended changes to the Plan to the Chairman of the Nuclear Review Board.

j. Review of every unplanned release reportable under 6.9.2.b.(5) of radioactive material to the environs; evaluate the event; specify remedial action to prevent recurrence; and document the event description, evaluation, and corrective action and the disposition of the corrective action in the plant records.

Authority

6.5.1.7 The Plant Operation Review Committee shall:

a. Recommend to the Manager - Nuclear Plant, written approval or disapproval of items considered under 6.5.1.6(a) through (d) above.

b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6(a) through (e) above constitutes an unreviewed safety question, as defined in 10 CFR 50.59.

c. Provide immediate written notification to the Superintendent, Nuclear Generation Division, or in his absence, the Superintendent, Nuclear Services, and the Nuclear Review Board of disagreement between the PORC and the Manager - Nuclear Plant; however, the Manager-Nuclear Plant shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

6.8.2 Each procedure and administrative policy of 6.8.1 above, and changes thereto, shall be reviewed in accordance with Specification 6.5.1.6 and shall be approved by the Manager - Nuclear Plant or his designated alternate per Specification 6.1.1, prior to implementation, and reviewed periodically as set forth in administrative procedures.

6.8.3 Temporary changes to procedures of 6.8.1 above may be made, provided:

a. The intent of the original procedure is not altered.

b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.

c. The change is documented, reviewed by the PORC and approved by the Manager - Nuclear Plant within 14 days of implementation.

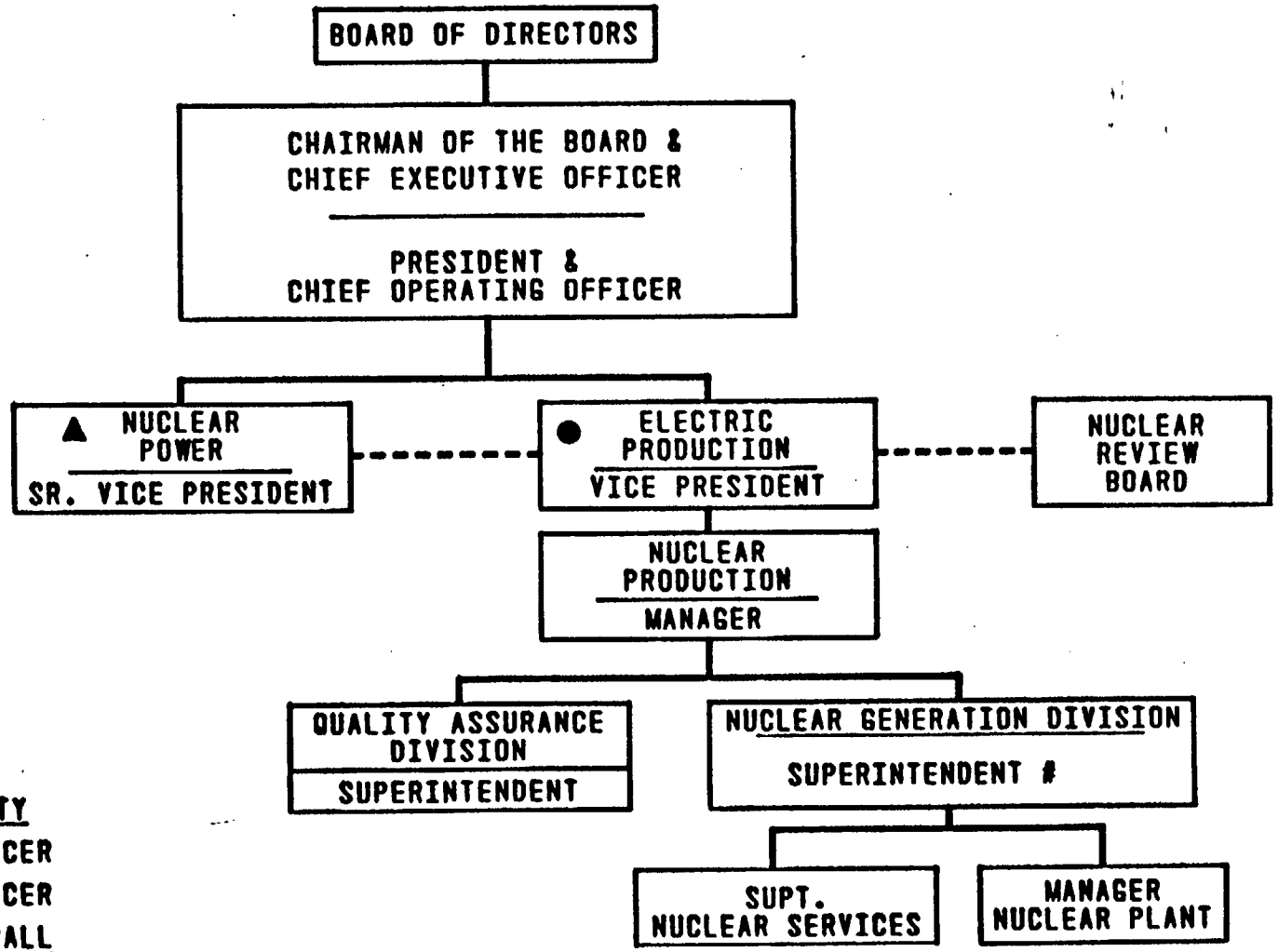
6.8.4 Written procedures shall be established, implemented and maintained covering the activities of the radiological effluent technical specifications as referenced below:

a. Offsite Dose Calculation Manual

b. Quality Assurance Program for the environmental monitoring using the guidance in Regulatory Guide 4.1, Revision 1, April 1975.

6.9 Reporting Requirements

In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following identified reports shall be submitted to the Administrator of the appropriate Regional Office unless otherwise noted.



REPORTING RESPONSIBILITY

▲ CHIEF EXECUTIVE OFFICER

● CHIEF OPERATING OFFICER

RESPONSIBLE FOR OVERALL FIRE PROTECTION PROGRAM

MANAGEMENT ORGANIZATION CHART

PHILADELPHIA ELECTRIC COMPANY

PEACH BOTTOM ATOMIC POWER STATION - UNITS 2 AND 3

FIGURE 7.1-1

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 118 TO FACILITY OPERATING LICENSE NO. DPR-44 AND

AMENDMENT NO. 122 TO FACILITY OPERATING LICENSE NO. DPR-56

PHILADELPHIA ELECTRIC COMPANY, ET AL.

PEACH BOTTOM ATOMIC POWER STATION, UNITS NOS. 2 AND 3

DOCKETS NOS. 50-277/278

1.0. INTRODUCTION

By letter dated November 18, 1985, Philadelphia Electric Company (the licensee) requested an amendment to its Operating License Nos. DPR-44 and DPR-56 for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3. The amendment request was submitted as proposed changes to the Administrative Controls Section of the Technical Specifications (TS) relating to the description of the licensee's management and plant operations organizations.

Specifically, the revisions to the TS proposed by this amendment application would: (1) divide the Health Physics and Chemistry organizations into two groups, each directed by a senior level supervisor; (2) divide the organization for the conduct of plant operations under a reorganization of station upper management through two new positions: Superintendent Operations and Superintendent Plant Services; (3) present the station organization chart in a new format; (4) add the Administration Engineer, Assistant Maintenance Engineer, Outage Planning Engineer, and ALARA-Health Physicist to the station organization chart; (5) revise licensed operator staffing requirements during periods when both units are shutdown; (6) permit certain revisions to the organization chart and onsite safety review committee composition without prior NRC approval; (7) change several titles on the organization charts; (8) revise the composition of the onsite safety review committee; (9) incorporate several minor revisions to establish consistency with the Standard Technical Specifications; (10) clarify who is authorized to approve procedures; and (11) revise the Management Organization Chart to reflect reorganization and title changes.

The staff is still reviewing change nos. (6) and (10). We have found the remaining proposed changes to be acceptable as proposed by the licensee.

2.0 EVALUATION

2.1 Division of the Health Physics and Chemistry Organizations into Two Groups

The proposed change to Figure 6.2-2 of the TS would divide the Health Physics and Chemistry programs into two groups, each directed by a senior level supervisor. Health Physics activities would continue to be supervised by the Senior Health Physicist. A new position of Senior Chemist would be established with the responsibility for the supervision of the radiochemistry and conventional chemistry activities. The Plant Chemist, who formerly reported to the Senior Health Physicist, would, under the new organization, report to the Senior Chemist.

The individual assigned to the new position of Senior Chemist meets the qualifications requirements of Regulatory Guide (RG) 1.8, September 1975, "Personnel Selection and Training." Direction of Health Physics and Chemistry activities by two senior level supervisors will enhance management control over these important plant activities and improve the effectiveness of the organization.

The staff finds that this proposed change allows distinct functional areas to be separately supervised and allows individuals holding supervisory positions to provide technical support in the areas of Plant Chemistry and Health Physics. Therefore, we find that this proposed change meets the criteria as specified in Sections 13.1.1 and 13.1.2 of NUREG-0800, the Standard Review Plan (SRP), and is acceptable.

2.2 Change Title of "Station Superintendent" to "Manager-Nuclear Plant" and Create Two New Positions: Superintendent-Operations and Superintendent-Plant Services

The proposed revisions to Figures 6.2-1 and 6.2-2 of the TS would change the title of "Station Superintendent" to "Manager-Nuclear Plant" and would create two new positions: Superintendent-Operations and Superintendent-Plant Services at the superintendent level to handle the plant management responsibilities previously handled in a single line organization through an Assistant Superintendent to the Station Superintendent. The Superintendent-Operations would manage the Senior Chemist, Technical Engineer and Operations Engineer. The Superintendent-Plant Operations would manage the Outage Planning Engineer, Maintenance Engineer and Senior Health Physicist.

The individuals to be assigned to the positions of Superintendent-Operations and Superintendent-Plant Services are the Assistant Superintendent and Technical Engineer, respectively. Both are currently licensed and represent a combined total of more than 37 years of operating experience at the Peach Bottom facility. The position of Manager-Nuclear Plant will be filled by the incumbent Station Superintendent.

The staff finds that the above proposed changes will better focus management attention on the performance of each of the plant activities essential to safe operation. The reorganization should promote better management control and provide clear effective lines of authority and communication between plant organizational units. Therefore, we find these proposed changes to be acceptable since they meet the criteria specified in Section 13.1.1 and 13.1.2 of the SRP.

2.3 New Format for Figure 6.2-2

The revised organization chart in Figure 6.2-2 would use a new format to improve clarity and depict the plant organization more accurately. The features of the new format are as follows:

(a) A block format is used to enhance clarity.

(b) References to "clerical", "custodial", and "stores" personnel are removed.

(c) Non-supervisory professional job categories such as Engineer, Technical, Physicist, Chemist and Technical Assistant are grouped under the category of "Staff."

(d) The Shift Technical Advisor is correctly depicted as reporting to the Operations Engineer, with advisory responsibility to the Shift Superintendent and operating shift.

These proposed changes improve clarity and are revisions in nomenclature. Therefore, the staff finds that the revised Figure 6.2-2 is an acceptable organization chart since it shows the organization for conduct of plant operations at PBAPS and indicates the titles of the positions specified in Section 13.1.2 of the SRP.

2.4 Change Figure 6.2-2 to Add the Following Positions: Administration Engineer, Assistant Maintenance Engineer, Outage Planning Engineer, and ALARA-Health Physicist

The proposed revisions to Figure 6.2-2 of the TS would add the following four positions to the PBAPS organization chart: Administration Engineer, Assistant Maintenance Engineer, Outage Planning Engineer, and ALARA-Health Physicist.

The duties of the Administration Engineer include the administration of security, clerical and selected regulatory activities. The Assistant Maintenance Engineer reports directly to the Maintenance Engineer. The duties of the Outage Planning Engineer involve the planning, coordination and management of plant outage activities. The position of ALARA-Health Physicist enhances the implementation of the Peach Bottom ALARA program. These individuals should enhance station management control over plant activities essential to safety and effective operations. The inclusion

of these individuals also delineates the organizational structure which provides for integrated management of activities that support the operation of PBAPS. Therefore, the staff finds that these proposed changes are acceptable since they conform with the criteria specified in Section 13.1.2 of the SRP.

2.5 Revise Licensed Operator Staffing Requirements During Period When Both Units are Shutdown

The proposed change, as stated in Note 3 of Figure 6.2-2, would reduce the requirements to one Senior Operator and two Operators during periods when Peach Bottom, Units 2 and 3, are both in the shutdown or refuel mode. The change would permit the reassignment of these licensed personnel during a dual plant outage to support core alterations and other outage activities that require their expertise.

The proposed staffing requirements are consistent with the Commission's regulations specified in 10 CFR 50.54(m)(2). Therefore, the staff finds this proposed change to be acceptable.

2.6 Change Several Titles on the Organization Charts

The proposed changes to the organization charts on Figures 6.2-1, 6.2-2 and 7.1.1, and to pages 243, 246, 247, 248 and 254 of the TS would reflect the following title changes: "Station Superintendent" to "Manager-Nuclear Plant" and "Results Engineer" to "Performance Engineer." These represent only changes in nomenclature and the responsibilities of these two positions remain unchanged.

Because these proposed changes involve only title revisions, the staff finds that these changes are acceptable.

2.7 Revise Composition of the Onsite Safety Review Committee

The proposed change revises the onsite safety review committee composition as stated in Section 6.5.1.2 of the TS to reflect previously described staff changes.

The proposed change would add the Superintendent-Operations, Superintendent-Plant Services, Outage Planning Engineer, and Senior Chemist as primary PORC members. To accommodate these additions, the positions of Assistant Superintendent, Results (Performance) Engineer, Reactor Engineer and Instrument and Controls Engineer would be removed as primary PORC members. The number of PORC members is not changed by this proposed revision.

The experience and knowledge of the proposed new members in nuclear plant activities will enhance the review capabilities of the PORC. With the exception of the Senior Chemist, these additions to PORC are currently

senior reactor operator (SRO) licensed engineers. These four individuals fill senior plant management positions and meet the qualifications of ANSI/ANS 3.1-1978 and ANSI N18.1-1971 for comparable positions. The revisions to PORC composition elevates the experience and knowledge of the committee membership and consequently enhances the capability of the committee to perform its required functions.

The staff finds that this proposed change does not degrade the capabilities of the PORC and meets the acceptable criteria in Section 13.4 of the SRP. Therefore, the staff finds this proposed change is acceptable.

2.8 Incorporate Several Minor Revisions to Establish Consistency with the Standard Technical Specifications

By letter dated March 18, 1985 (J. F. Stolz, NRC, to E. G. Bauer, Jr., PECo), the NRC suggested that the organization charts for Peach Bottom and Limerick be consistent. Accordingly, the following proposed revisions would be made to Figure 6.2-2 of the TS:

(a) Add position of Assistant Maintenance Engineer.

(b) Delete the note regarding responsibility for onsite fire protection. In addition to establishing consistency with the organization chart in the Limerick TS, the chart does not appear to be the appropriate place to identify job responsibilities. 10 CFR 50.48(a) of the Commission's regulations identifies the Fire Protection Plan as the appropriate document for identifying fire protection responsibilities. The Station Superintendent, to be assigned as the Manager-Nuclear Plant, is identified as being responsible for fire protection in the Peach Bottom Fire Protection Plan.

Further, the following revisions have been proposed by the licensee to establish consistency with the Standard Technical Specifications.

(a) A minor revision to the meeting frequency (6.5.1.4) and quorum (6.5.1.5) specifications for the onsite safety review committee is proposed on page 247 of the TS. These revisions recognize the alternate to the PORC Chairman in accordance with the Standard Technical Specifications, NUREG-0123, Revision 3.

(b) Section 6.6.1.b requires PORC review of Reportable Event Reports; however, this PORC responsibility is not identified in Section 6.5.1.6 (PORC Responsibilities). The NRC, in the Safety Evaluation for Amendment Nos. 110 and 113, issued July 17, 1985, requested that the licensee amend Section 6.5.1.6 to establish consistency with Section 6.5.1.b. Accordingly, an addition to

Section 6.5.1.6 is proposed on page 247 of the TS to reflect the review responsibility of PORC for reportable events required by 10 CFR 50.73.

(c) A revision to Section 6.8.2 is proposed to establish consistency with the Standard Technical Specifications utilized for preparation of the Limerick TS. The revision would refer back to Section 6.5.1.6 to clarify that PORC is responsible for the review of procedures. The change would permit PORC to appoint subcommittees to perform reviews or studies in areas of particular expertise.

The staff finds that these proposed changes which establish consistency with the Standard Technical Specifications are acceptable since they clarify the responsibilities of the PORC and conform to Section 13.4 of the SRP.

2.9 Changes to Figure 6.2-1

In addition to the proposed changes previously described in Figure 6.2-1, the Management Organization Chart is revised to depict the splitting of the Generation Division into separate Fossil/Hydro and Nuclear groups, and the formation of a Nuclear Services group. The NRC was previously informed of this reorganization in letters dated April 4, 1983 and May 29, 1984.

The staff finds this proposed change to be acceptable since it conforms to Section 13.1.1 of the SRP.

3.0 ENVIRONMENTAL CONSIDERATIONS

The amendments relate to changes in 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.

4.0 CONCLUSION

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, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: C. Goodman
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