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Amdt. 129

Dockets Nos. 50-277(278)

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to DPR-56

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

Dear Mr. Bauer:

SUBJECT: ORGANIZATION FOR CONDUCT OF PLANT OPERATIONS WHILE IN COLD SHUTDOWN
CONDITION (TAC NO. 65680)

RE: PEACH BOTTOM ATOMIC POWER STATION, UNIT NOS. 2 AND 3

The Commission has issued the enclosed Amendments Nos. 126 and 129 to Facility Operating License Nos. DPR-44 and DPR-56 for the Peach Bottom Atomic Power Station, Unit Nos. 2 and 3. These amendments consist of changes to the Technical Specifications in response to your application dated August 10, 1987.

These amendments provide interim relief, while operating in cold shutdown conditions prior to any startup of the facility, from the requirement in Figure 6.2-2 of the Technical Specifications which requires that either the Plant Manager or the Superintendent-Operations shall hold a Senior Operator License.

A copy of the Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's Bi-Weekly Federal Register Notice.

Sincerely,

/s/

Robert E. Martin, Project Manager
Project Directorate I-2
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

- Enclosures:
1. Amendment No. 126 to DPR-44
 2. Amendment No. 129 to DPR-56
 3. Safety Evaluation

cc w/enclosures:
See next page

J
19
9/22/87
WB

PDI-2/MB
MO'Brien
9/1/87

PDI-2/PM
REMartin:ca
9/10/87

OGC
1/87

PDI-2/D
WButler
9/28/87



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555
September 29, 1987

Dockets Nos. 50-277/278

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

Dear Mr. Bauer:

SUBJECT: ORGANIZATION FOR CONDUCT OF PLANT OPERATIONS WHILE IN COLD SHUTDOWN
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RE: PEACH BOTTOM ATOMIC POWER STATION, UNIT NOS. 2 AND 3

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Sincerely,

Robert E. Martin
Robert E. Martin, Project Manager
Project Directorate I-2
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 126 to DPR-44
2. Amendment No. 129 to DPR-56
3. Safety Evaluation

cc w/enclosures:
See next page

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

Peach Bottom Atomic Power Station,
Units 2 and 3

cc:

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Mr. W. M. Alden
Engineer-In-Charge-Licensing
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Philadelphia, Pennsylvania 19101

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U. S. Nuclear Regulatory Commission
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Bureau of Radiation Protection
Pennsylvania Department of
Environmental Resources
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Harrisburg, Pennsylvania 17120

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

Mr. Gary Mock
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Columbus, Ohio 43209

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Vice President - Production
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Wilmington, Delaware 19899

Mr. Tom Magette
Power Plant Research Program
Department of Natural Resources
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Tawes State Office Building
Annapolis, Maryland 21401

Mr. Roland Fletcher
Department of Environment
201 West Preston Street
Baltimore, Maryland 21201



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. 126
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 August 10, 1987, 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 or 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:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 126, 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

/s/

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

Attachment:
Changes to the Technical
Specifications

Date of Issuance: ~~September~~ 29, 1987

PDI-2/PA
MPN:ten
9/1/87

PDI-2/PM
REMartin:ca
9/10/87

JSevto concurred on this amendment - on the cover ltr and Unit 3 of ~~the~~ amendment pg OGC on September 22, 1987 JWB

1/187

PDI-2/D
WButler
9/28/87

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 126, 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



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

Attachment:
Changes to the Technical
Specifications

Date of Issuance: ~~September~~ 29, 1987

ATTACHMENT TO LICENSE AMENDMENT NO. 126

FACILITY OPERATING LICENSE NO. DPR-44

DOCKET NO. 50-277

Replace the following page of the Appendix A Technical Specifications with the enclosed page. The revised area is indicated by marginal lines.

Remove

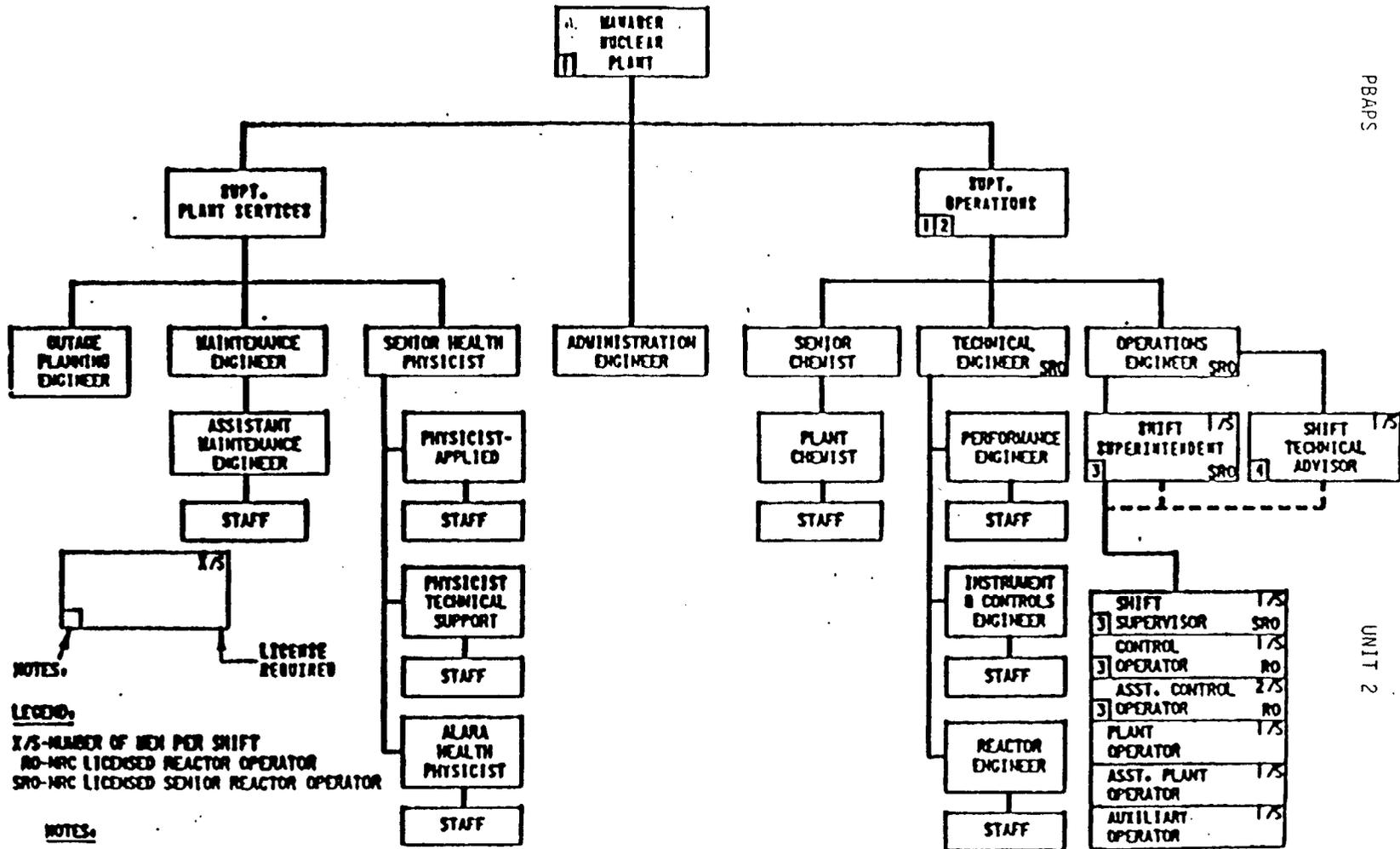
245

Insert

245

Amendment No. 10, 39, 67, 74, 94, 118, 126

PBAPS



NOTES:

LICENSE REQUIRED

LEGEND:

X/5-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

*Except during cold condition operations resulting from the NRC shutdown order of March 31, 1987.

UNIT 2

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



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. 129
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 August 10, 1987, 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 or 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:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 129, 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

/s/

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

Attachment:
Changes to the Technical
Specifications

Date of Issuance: ~~September~~ 29, 1987

*Issue the Post Notice
OPR + Henry
9/22/87
JL*

PDI-2/MB
MB/BEH
9/1/87

PDI-2/PM
RE Martin:ca
9/10/87

OGC
1 187

PDI-2/D
WButler
9/28/87
WB

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 129, 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



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

Attachment:
Changes to the Technical
Specifications

Date of Issuance: ~~September~~ 29, 1987

ATTACHMENT TO LICENSE AMENDMENT NO. 129

FACILITY OPERATING LICENSE NO. DPR-56

DOCKET NO. 50-278

Replace the following page of the Appendix A Technical Specifications with the enclosed page. The revised area is indicated by marginal lines.

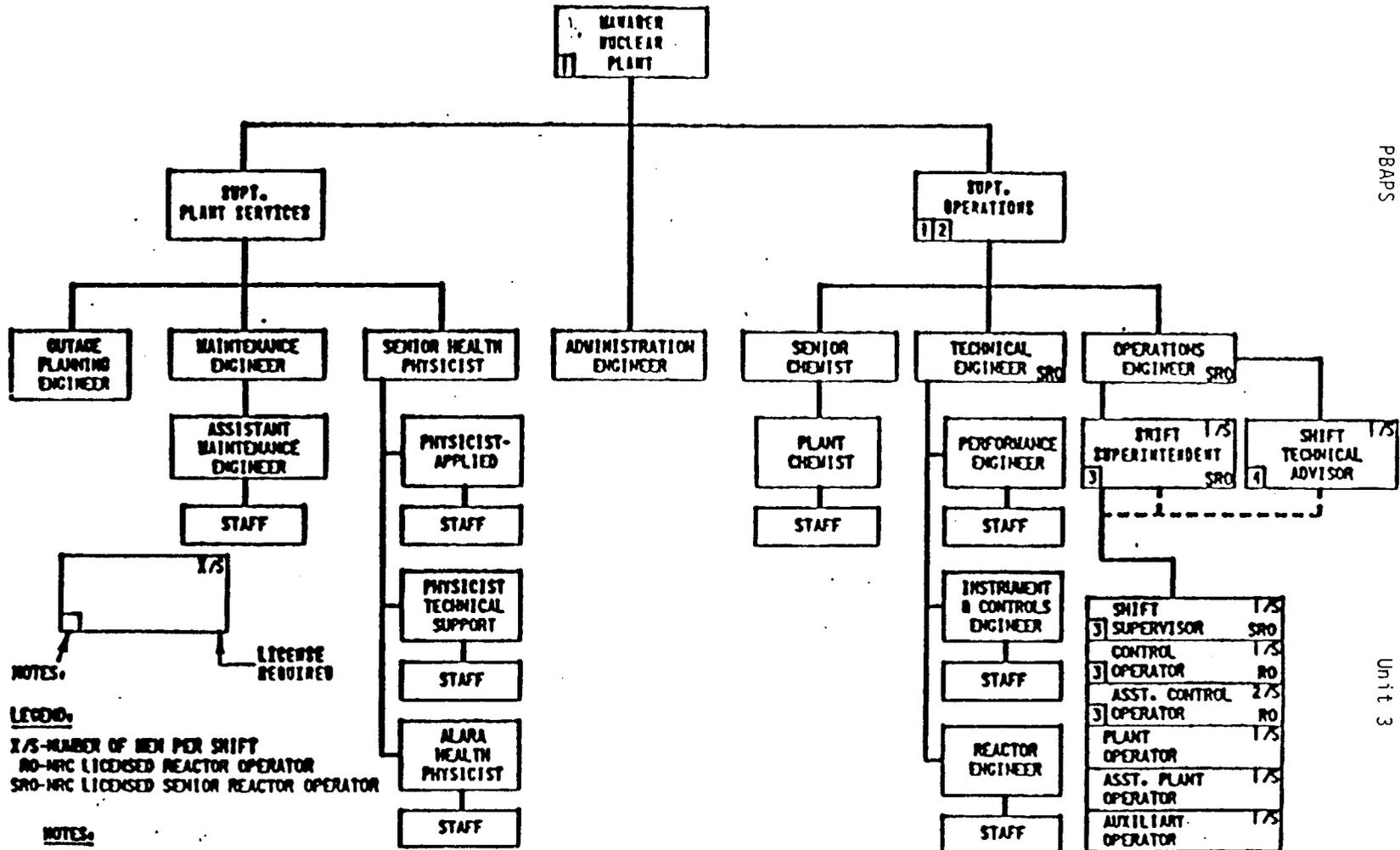
Remove

245

Insert

245

Amendment No. 10, 39, 41, 73, 98, 122, 129



NOTES:

LEGEND:

1/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

*Except during cold condition operations resulting from the NRC shutdown order of March 31, 1987.

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

PBAPS

Unit 3



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION SUPPORTING

AMENDMENT NOS. 126 AND 129 TO FACILITY OPERATING

LICENSE NOS. DPR-44 and DPR-56

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

PEACH BOTTOM ATOMIC POWER STATION, UNIT NOS. 2 and 3

DOCKET NOS. 50-277 and 50-278

1.0 INTRODUCTION

By letter dated August 10, 1987, Philadelphia Electric Company requested an amendment to Facility Operating License Nos. DPR-44 and DPR-56 for Peach Bottom Atomic Power Station, Unit Nos. 2 and 3. This amendment would provide interim relief, while operating in cold shutdown conditions prior to any startup of the facility, from the requirement in Figure 6.2-2 of the Technical Specifications which requires that either the Plant Manager or the Superintendent-Operations shall hold a Senior Operator license.

2.0 EVALUATION

As noted above, Figure 6.2-2 (enclosed) of the Technical Specifications shows the Organization for Conduct of Plant Operations. The organizational block for the positions of Superintendent of Operations and Manager Nuclear Plant have a 1 in the lower left corner of the block. Note 1 states that "either the Plant Manager or Superintendent of Operations shall hold an SRO license." Philadelphia Electric requests that note 1 be annotated with the statement "except during cold condition operations resulting from the NRC order of March 31, 1987."

The staff has reviewed this request and found it acceptable for the following reasons:

- 1) The individual to be assigned to the position of Superintendent of Operations meets all requirements for the position of Operations Manager (a position comparable to the Peach Bottom Superintendent of Operations) described in Section 4.2 of ANSI N18.1-1971 except for holding an SRO license. The individual is a Degreed Engineer with about 20 years nuclear experience and has held a Senior Operator license at the Limerick Station, a BWR similar to Peach Bottom.
- 2) The Shift Superintendents (Shift Supervisors) report to an Operations Engineer who meets the qualifications requirements for the position of Operations Manager described in Section 4.2 of ANSI N18.1-1971. The Operations Engineer is in a position between the Shift Superintendents and the Superintendent of Operations.
- 3) Peach Bottom, Units 2 & 3, will be in a cold shutdown condition.

3.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Response to Comments

Comments were received in response to the Federal Register Notice published September 2, 1987 (52 FR 33305).

Comments were received as follows:

- 1) A comment was received from Ms. Janet Unfried by phone on September 17, 1987. She expressed her opposition to what she understood were the proposed usage of "uneducated people to run the plant." Ms. Unfried's concerns seemed to be answered somewhat following discussion of the proposed amendment.
- 2) Comments were received from Patricia T. Birnie of the Maryland Nuclear Safety Coalition, by letter dated September 15, 1987. Ms. Birnie expressed opposition to the proposed amendment which she understood would excuse "the utility from requiring their plant manager and superintendent of operations to obtain senior operator licenses." Ms. Birnie also expressed opposition to a "weakening of the regulations" for Peach Bottom. The staff notes that there are no exceptions to the NRC's regulations involved with the proposed amendment. Further, the amendment does not remove the SRO requirement from the Technical Specifications; however, interim relief is provided under certain specified condition.
- 3) Comments were received from Ms. Jean S. Ewing by letter dated September 15, 1987. Ms. Ewing expressed opposition to the proposed amendment which she understood would exempt the licensee from the SRO requirement. Ms. Ewing expressed concern that the proposed amendment represented an exception to proof of management competence and a breach of procedures.

The staff notes that the amendment does not exempt the licensee from the SRO requirement altogether; it does however provide interim relief under certain specified conditions. The staff notes that the licensee, as part of its response to the NRC's Order of March 31, 1987, has made changes in the management organization at the plant. The licensee proposes to make the changes regarding the position of Superintendent-Operations with the objective of strengthening and enhancing the management of the PBAPS. The NRC staff, for the reasons stated in Section 2.0 finds the licensee's proposal to be acceptable. The staff has not identified any breach of procedures involved with the licensee's application for amendment to the Technical Specifications which is limited both in the scope and the duration of the requested relief.

- 4) Comments were provided by Mr. Marvin Lewis, by letter dated September 15, 1987. Mr. Lewis expressed concern that the departure of certain individuals from the plant staff would result in a lack of needed insight during the restart of the plant and proposed that the change-over be delayed until after restart. The staff notes that approval of the proposed amendment does not represent a decision to any degree regarding the adequacy of the licensee's programs and the staff's requirements for restart of the PBAPS. These decisions will be the subject of further actions by the NRC. The relief granted by the amendment applies only to operations while in a cold shutdown condition and do not extend to criticality of the reactor or other modes of startup operations.
- 5) Comments were received from Debra L. Hamilton of Nuclear Free America on September 22, 1987. Ms. Hamilton expressed opposition to the proposed amendment which she understood "...would excuse Philadelphia Electric from requiring a senior operator's license for the plant manager and for superintendent of operations." She requested that the NRC "...not allow this further weakening of regulations to cause further erosion of public trust."

The staff's response to the above comments is the same as that provided for items 2 and 3, above.

State Consultation

In accordance with the Commission's regulations, consultation was held with the Commonwealth of Pennsylvania's Bureau of Radiation Protection by telephone. The NRC staff consulted with the Commonwealth of Pennsylvania representative on August 25, 1987, who concurred in general with the proposed amendment but expressed the view that the overall depth of experience of the revised operations staff should be carefully scrutinized. The staff notes, as stated previously, that the staff's approval of the proposed amendment does not represent a decision to any degree regarding the adequacy of the licensee's programs and the staff's requirements for restart of the PBAPS. The relief granted by this amendment does not extend beyond the cold shutdown condition and decisions regarding restart of the plant, including qualifications of the staff to operate the plant, will be the subject of further actions by the NRC.

No Significant Hazards Consideration Determination

The Commission's regulations in 10 CFR 50.92 state that the Commission may make a final determination that a proposed license amendment involves no significant hazards considerations if operation of the facility in accordance with the proposed amendment would not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or

- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- 3) Involve a significant reduction in a margin of safety.

The licensee has analyzed the problem identified in the NRC Order of March 31, 1987 to determine the underlying causes and has developed a plan to assure that the PBAPS will operate safely. The licensee has taken action to address concerns identified in the Order which include changes in the management organization at the plant. These changes include a change in the Superintendent-Operations. The licensee indicates that the individual designated for this position is scheduled to complete the examination requirements for the Senior Reactors Operator's license required to meet the requirements of the Technical Specification (TS) Figure 6.2-2 during October 1987. The licensee submits that a temporary relief from the TS requirement, which would allow the individual to promptly assume the duties of Superintendent-Operations, would strengthen and enhance the management of the PBAPS and could avoid the potential for further delay in the licensee's readiness preparations for restart of Unit 2.

The individual who will succeed the current Superintendent-Operations has completed the majority of training required for the SRO license on PBAPS; this individual has recently held a SRO at a similar facility and the Operations Engineer who will report to the Superintendent-Operations holds a SRO license. The relief to be granted is for an interim period of several months during which time the plant will remain in a cold shutdown condition. Therefore, these proposed amendments do not involve a significant increase in the probability or consequences of an accident previously evaluated. Since the lack of a SRO license on the part of the Plant Manager or Superintendent-Operations under the conditions stated herein does not constitute a potential new accident precursor this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The new Superintendent-Operations designee's training and experience qualifications, the support of the Operations Engineer who does hold a SRO license and the maintenance of the plant in a cold shutdown status during the period of the relief adequately compensate for the temporary lack of certain requirements and the conducting of the NRC examination required for the issuance of a SRO license. Therefore, this change does not involve a significant reduction in the margin of safety.

The staff has determined, based on the review of the licensee's submittal that operation of the facility in accordance with the proposed amendments, in a cold shutdown condition, would not involve a significant reduction in the margin of safety and that:

- 1) Operation of the facility in accordance with the proposed amendments would not significantly increase the probability or consequences of an accident previously evaluated.

- 2) Operation of the facility in accordance with the proposed amendments would not create the possibility of a new or different kind of accident from any accident previously evaluated.
- 3) Operation of the facility in accordance with the proposed amendments would not involve a significant reduction in a margin of safety.

Therefore, the staff concludes that these amendments involve no significant hazards considerations.

4.0 ENVIRONMENTAL CONSIDERATIONS

These amendments involve a change to a requirement with respect to the organization for the conduct of plant operations within the restricted area as defined in 10 CFR Part 20. The staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration. The Commission has received comments on the proposed finding as discussed above. The Commission has determined that none of the comments impact the proposed finding for each of the three factors of 10 CFR 50.92 and, therefore, the Commission has made its final finding of no significant hazards consideration as noted above. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement nor environmental assessment need be prepared in connection with the issuance of the amendments.

5.0 CONCLUSION

The Commission has made a proposed determination that the amendments involve no significant hazards consideration, which was published in the Federal Register (52 FR 33305) on September 2, 1987 and consulted with the Commonwealth of Pennsylvania. Public comments and comments by the Commonwealth of Pennsylvania were received as discussed above. The Commission has determined that none of the comments impact the proposed finding for each of the three factors of 10 CFR 50.92 and, therefore, the commission has made its final finding of no significant hazards consideration as noted above.

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: F. R. Allenspach

Dated: September 29, 1987