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TO DPR-56

June 22, 1988

Dockets Nos. 50-277/278

Mr. William M. Alden
Director-Licensing
Philadelphia Electric Company
2301 Market Street
Philadelphia, Pennsylvania 19101

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REMartin(2)	Wanda Jones	
RClark	Tech Branch-FAI	llenspach
EButcher	JPartlow	BGrimes
MO'Brien(3)		

Dear Mr. Alden:

SUBJECT: CORPORATE AND STATION STAFF ORGANIZATIONAL STRUCTURE (TAC NO. 66115)

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

The Commission has issued the enclosed Amendments Nos. 132 and 135 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 November 19, 1987 as augmented by the information in your report "Plan for Restart of Peach Bottom Atomic Power Station, Section I, Corporate Action" dated November 25, 1987 and in revisions to Section I of the Plan submitted on April 8, 1988.

These amendments would modify Section 6 of the facility Technical Specifications to reflect (I) a new corporate and (II) a new plant staff organizational structure, (III) a revised composition of the Plant Operations Review Committee and (IV) several administrative changes.

A copy of the Safety Evaluation is also enclosed. Notice of Issuance of Amendments to Facility Operating Licenses and Final Determination of No Significant Hazards Consideration will be forwarded to the Office of the Federal Register for publication. It will also be repeated 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. 132 to DPR-44
2. Amendment No. 135 to DPR-56
3. Safety Evaluation
4. Notice of Issuance

cc w/enclosures:
See next page

Previously concurred*

PDI-2/LA*	PDI-2/PM*	OGC*
MO'Brien	REMartin:mr	APH
05/10/88	04/11/88	06/13/88

PDI-2/D*
WButler
6/21/88



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555
June 22, 1988

Dockets Nos. 50-277/278

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Office of Nuclear Reactor Regulation

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See next page

Mr. William M. Alden
Philadelphia Electric Company

Peach Bottom Atomic Power Station,
Units 2 and 3

cc:

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

Philadelphia Electric Company
ATTN: Mr. D. M. Smith, Vice President
Peach Bottom Atomic Power Station
Route 1, Box 208
Delta, Pennsylvania 17314

H. Chris Schwemm
Vice President, Production
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
475 Allendale Road
King of Prussia, Pennsylvania 19406

Mr. Bryan W. Gorman
Manager - External Affairs
Public Service Electric & Gas Company
P.O. Box 236, N28
Hancocks Bridge, New Jersey 08038

John R. McKinstry, Esq.
505 Executive House
P. O. Box 2357
Harrisburg, PA 17120

Jay Gutierrez
Regional Counsel
USNRC, Region I
475 Allendale Road
King of Prussia, PA 19406

Adjudicatory File
Atomic Safety and Licensing Board
Panel Docket
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

Mr. Gary Mock
P. O. Box 09181
Columbus, Ohio 43209

Delmarva Power and Light Company
c/o Jack Urban
General Manager, Fuel Supply
800 King Street
P.O. Box 231
Wilmington, DE 19899

Mr. Tom Magette
Power Plant Research Program
Department of Natural Resources
B-3
Tawes State Office Building
Annapolis, Maryland 21401

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

Morey M. Myers, Esq.
General Counsel
Commonwealth of Pennsylvania
Office of General Counsel
P. O. Box 11775
Harrisburg, Pennsylvania 17108

Mr. William M. Alden
Philadelphia Electric Company

Peach Bottom Atomic Power Station,
Units 2 and 3

Samuel J. Chilk
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Donald P. Irwin, Esq.
Hunton & Williams
707 East Main Street
P. O. Box 1535
Richmond, Virginia 23212

Docketing and Service Section
Office of the Secretary
U. S. Nuclear Regulatory Commission
Washington, G. C. 20555

John H. Beisner, Esq.
O'Melveny & Myers
555 13th Street, N.W.
Washington, D.C. 20004

Administrative Judge
Glenn O. Bright
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Administrative Judge
Richard F. Cole
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Administrative Judge
John H. Frye, III, Chairman
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Ann P. Hodgdon, Esq.
Attorney
Office of the General Counsel
U. S. Nuclear Regulatory Commission
Washington,, DC 20555

George C. Freeman, Jr., Esq.
Attorney
Hunton and Williams
707 East Main Street, P.O. Box 1535
Richmond,, VA 23212

Donald P. Irwin, Esq.
Attorney
Hunton and Williams
707 East Main Street, P. O. Box 1535
Richmond,, VA 23212

William T. Coleman, Esq.
O'Melveny and Myers
555 13th Street, N.W.
Washington, DC 20004

Timothy D. Searchinger, Esq.
Deputy General Counsel
Office of General Counsel
Commonwealth of Pennsylvania
333 Market Street
Harrisburg, PA 17101

Assistant Counsel
Richard P. Mather, Esq.
Department of Environmental Resources
Commonwealth of Pennsylvania
505 Executive House, P.O. Box 2357
Harrisburg,, PA 17120

Eugene J. Bradley, Esq.
Philadelphia Electric Company
2301 Market Street
Philadelphia,, PA 19101

Atomic Safety and Licensing
Appeal Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

UNITED STATES NUCLEAR REGULATORY COMMISSIONPHILADELPHIA ELECTRIC COMPANYPUBLIC SERVICE ELECTRIC AND GAS COMPANYDELMARVA POWER AND LIGHT COMPANYATLANTIC CITY ELECTRIC COMPANYDOCKET NOS. 50-277 AND 50-278NOTICE OF ISSUANCE OF AMENDMENT TO FACILITYOPERATING LICENSEAND FINAL DETERMINATION OF NO SIGNIFICANTHAZARDS CONSIDERATION

The U. S. Nuclear Regulatory Commission (Commission) has issued Amendment No. 132 to Facility Operating License No. DPR-44 and Amendment No. 135 to Facility Operating License No. DPR-56, issued to Philadelphia Electric Company, Public Service Electric and Gas Company, Delmarva Power and Light Company, and Atlantic City Electric Company, which revised the Technical Specifications for operation of the Peach Bottom Atomic Power Station, Unit Nos. 2 and 3, located in York County, Pennsylvania. The amendments were effective as of the date of issuance. The subject changes in the organizational structure are to be completed within ninety (90) days of the issuance of the amendments.

The amendments modified Section 6 of the facility Technical Specifications to reflect (I) a new corporate and (II) a new plant staff organizational structure, (III) a revised composition of the Plant Operations Review Committee and (IV) several administrative changes.

The application for the amendments complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations. The Commission has made appropriate findings as required by the Act and the Commission's rules and regulations in 10 CFR Chapter I, which are set forth in the license amendments.

Notice of Consideration of Issuance of Amendments and Proposed No Significant Hazards Consideration Determination and Opportunity for Hearing in connection with this action was published in the FEDERAL REGISTER on December 23, 1987 (52 FR 48593). On January 22, 1988 the Commonwealth of Pennsylvania filed a document entitled "Commonwealth of Pennsylvania's Petition To Intervene, Request for Hearing and Comments Opposing No Significant Hazards Consideration." On April 1, 1988 the Commission issued an Order which referred the matter to the Chairman of the Atomic Safety and Licensing Board Panel for consideration of whether the petition to intervene should be granted. The Order also indicated that the request for a discretionary formal restart hearing on matters outside the scope of this proceeding would be addressed in a separate letter to Governor Casey. This letter, which concluded that such hearings are unnecessary, was issued on April 6, 1988.

Under its regulations, the Commission may issue and make an amendment immediately effective, notwithstanding the pendency before it of a request for a hearing from any person, in advance of the holding and completion of any required hearing, where it has determined that no significant hazards consideration is involved.

The Commission has applied the standards of 10 CFR 50.92 and has made a final determination that the amendment involves no significant hazards consideration. The basis for this determination is contained in the Safety Evaluation related to this action. Accordingly, as described above, the amendments have been issued and made immediately effective and any hearing will be held after issuance.

The Commission has determined that the amendments satisfy the criteria for categorical exclusion in accordance with 10 CFR 51.22. Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared for these amendments.

For further details with respect to the action see (1) the application for amendments dated November 19, 1987, as augmented by information in the "Plan for Restart of Peach Bottom Atomic Power Station, Section I, Corporate Action" dated November 25, 1987 and in revisions to Section I of the Plan submitted on April 8, 1988, (2) Amendment No. 132 to License No. DPR-44, (3) Amendment No. 135 to License No. DPR-56, and (4) the Commission's related Safety Evaluation. All of these items are available for public inspection at the Commission's Public Document Room, 1717 H Street, N. W., Washington, D. C., and at the Government Publications Section, State Library of Pennsylvania, Education Building, Commonwealth and Walnut Streets, Harrisburg, Pennsylvania 17126. A copy of items (2), (3) and (4) may be obtained upon request addressed to the U. S. Nuclear Regulatory Commission, Washington, D. C. 20555, Attention: Director, Division of Reactor Projects I/II.

Dated at Rockville, Maryland this 22nd day of June 1988.

FOR THE NUCLEAR REGULATORY COMMISSION



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



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. 132
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 19, 1987 as augmented by the information in the report "Plan for Restart of Peach Bottom Atomic Power Station, Section I, Corporate Action" dated November 25, 1987 and in revisions to Section I of the Plan submitted on April 8, 1988, 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. 132, 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. The subject changes in the organizational structure are to be completed within ninety (90) days of the issuance of this amendment.

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: June 22, 1988

APT 6/13/88 amendment subject to SFE changes as indicated.

*PNV:MLA
MON:men
5/10/88*

*PDI-2/PM
REMartin:mr
4/11/88*

*OGC
W. W. W. W.
6/9/88*

*PDI-2/D
WButler
6/21/88*

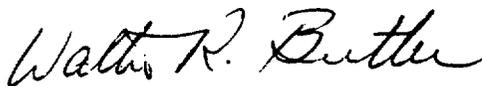
WB

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The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 132, 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. The subject changes in the organizational structure are to be completed within ninety (90) days of the issuance of this amendment.

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: June 22, 1988

ATTACHMENT TO LICENSE AMENDMENT NO. 132

FACILITY OPERATING LICENSE NO. DPR-44

DOCKET NO. 50-277

Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. The revised areas are indicated by marginal lines.

<u>Remove</u>	<u>Insert</u>
243	243
244	244
245	245
-	245a
246	246
247	247
248	248
248a	248a
249	249
251	251
252	252
252a	252a
253	253
254	254
261	261
262	262
266	266
267	267

PEAPS Unit 2

6.0 ADMINISTRATIVE CONTROLS

6.1 Responsibility

6.1.1 The Plant Manager shall be responsible for overall facility operation. In the absence of the Plant Manager, the Superintendent - Operations (or any other person that the Plant Manager 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.

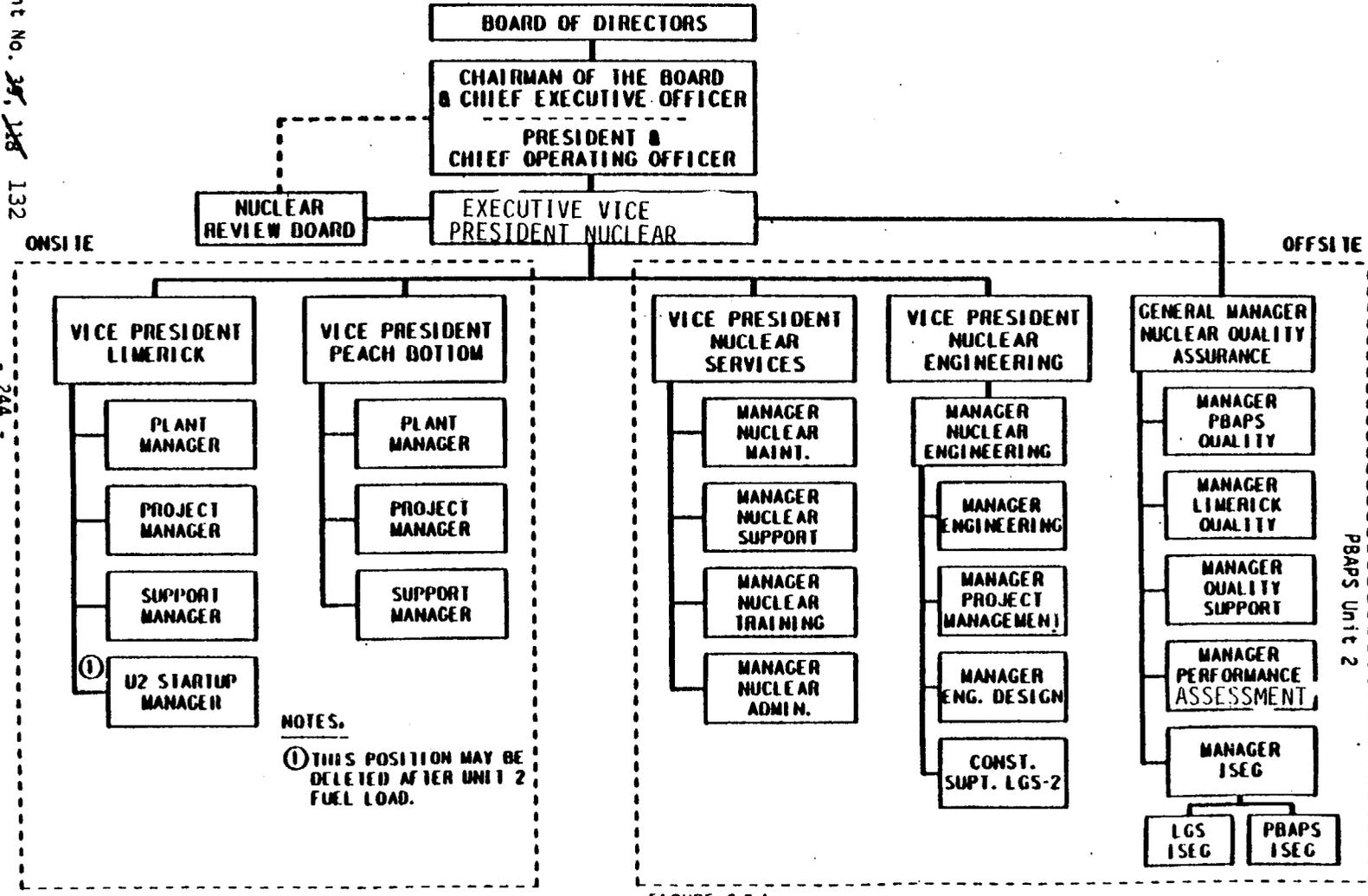
6.2.2 Facility Staff

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.

Amendment No. 39, 128 132

PHILADELPHIA ELECTRIC COMPANY NUCLEAR MANAGEMENT ORGANIZATION CHART



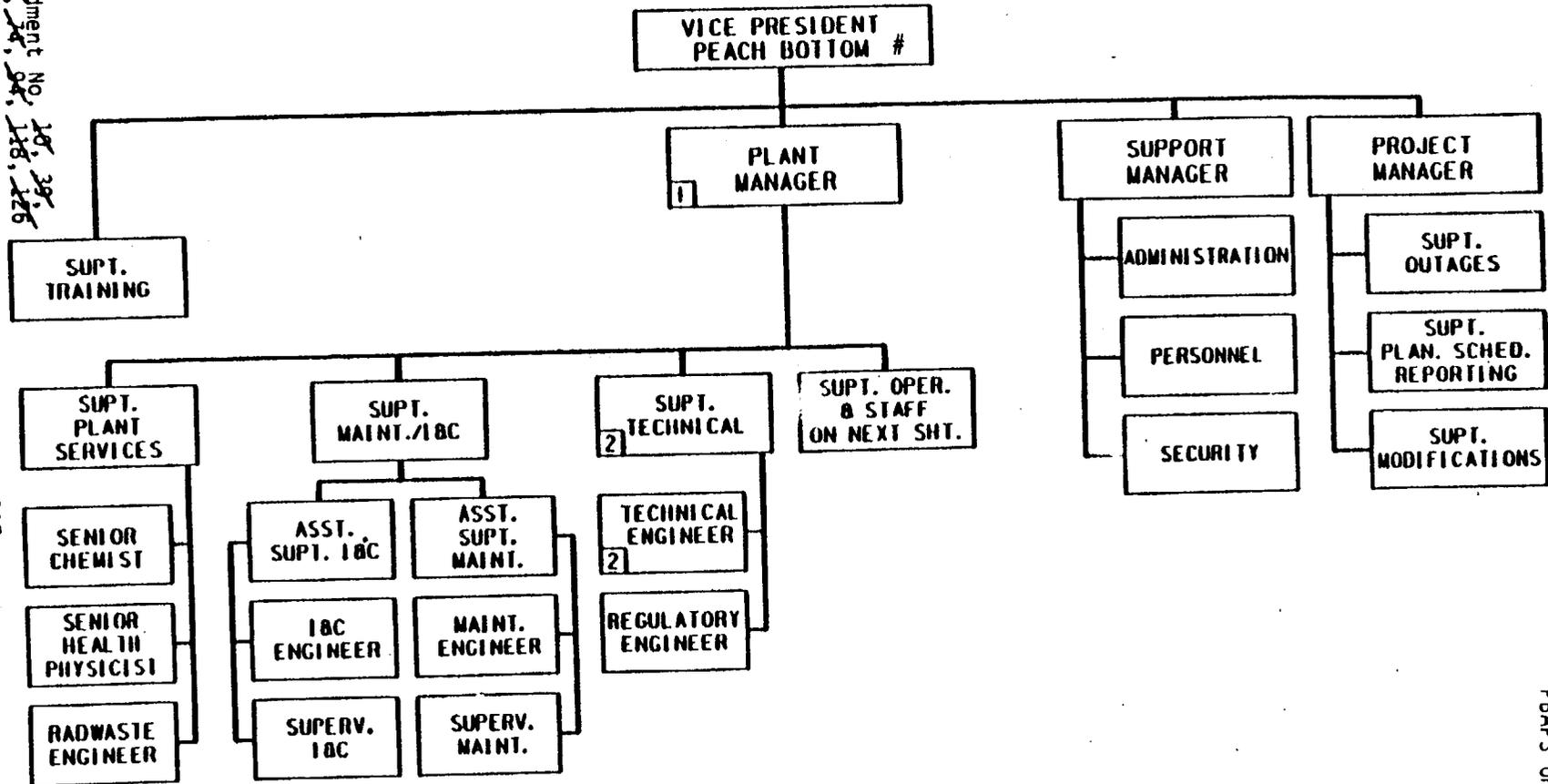
244

PEACH BOTTOM UNIT 2

FIGURE 6.7-1

ORGANIZATION FOR CONDUCT OF PLANT OPERATIONS PEACH BOTTOM ATOMIC POWER STATION

Amendment No. 10, 39,
 47, 48, 54, 118, 126
 132



- 245 -

NOTES:

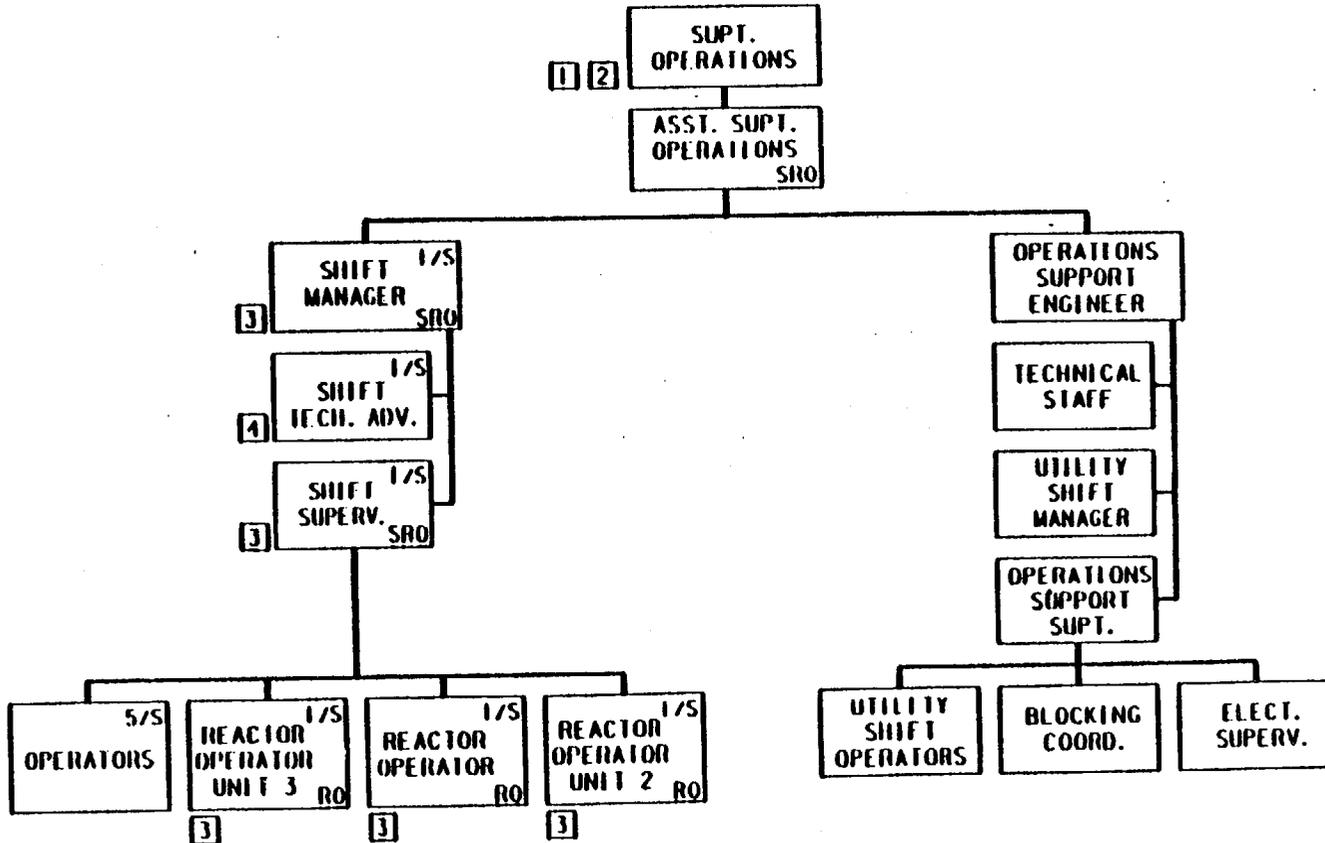
- ① EITHER PLANT MANAGER OR SUPT. OPER. SHALL HOLD AN SRO LICENSE. *
- ② EITHER SUPT.-TECHNICAL OR TECHNICAL ENGINEER SHALL HOLD AN SRO LICENSE.
- * Except during cold condition operations resulting from the NRC shutdown order of March 31, 1987.
- #Responsible for overall fire protection program

PBAPS Unit 2

Amendment No. 132

PBAPS Unit 2

ORGANIZATION FOR CONDUCT OF PLANT OPERATIONS PEACH BOTTOM ATOMIC POWER STATION



- 245a -

NOTES.

- 1 EITHER PLANT MANAGER OR SUPT. OPER. SHALL HOLD AN SRO LICENSE. *
 - 2 MAY ASSUME DUTIES OF PLANT MANAGER IN HIS ABSENCE (SEE PAGE 243 PARAGRAPH 6.1.1).
 - 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.

LEGEND.

X/S - NO. OF MEN PER SHIFT
 RO - NRC LICENSED REACTOR OPERATOR
 SRO - NRC SENIOR LICENSED REACTOR OPERATOR

6.3 Facility Staff Qualifications

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 Superintendent-Training 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 Operations Review Committee (PORC)

6.5.1.1 Function

The Plant Operations Review Committee shall function to advise the Plant Manager on all matters related to nuclear safety.

6.5.1.2 Composition

The Plant Operations Review Committee shall be composed of the:

Superintendent - Operations (Chairman)
Superintendent - Technical
Superintendent - Maintenance/Instrumentation and Controls
Superintendent - Plant Services
Assistant Superintendent - Operations
Maintenance Engineer
Technical Engineer
Regulatory Engineer
Shift Manager

6.5.1.3 Alternates

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 Operations 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 Plant Manager 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 Plant Manager, the Vice President, Peach Bottom Atomic Power Station, and 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

- i. Review of the Plant Security Plan and implementing procedures, and shall submit recommended changes to the Plan to the Plant Manager and the Nuclear Review Board.
- j. Review of the Emergency Plan and implementing procedures, and shall submit recommended changes to the Plan to the Plant Manager and the Nuclear Review Board.
- k. Review of every unplanned release reportable under 10CFR 50.72 and 50.73, 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 Operations Review Committee shall:

- a. Recommend in writing, to the Plant Manager, for his 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 Vice President, Peach Bottom Atomic Power Station, or in his absence, the Executive Vice President - Nuclear 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 6.1.1 above.

Records

6.5.1.8 The Plant Operations Review Committee shall maintain written minutes of each meeting and copies shall be provided to the Plant Manager; Vice President, Peach Bottom Atomic Power Station, and the Nuclear Review Board.

Amendment No. ~~102, 114~~ 132

6.5.2 Nuclear Review Board Function

6.5.2.1 The Nuclear Review Board (NRB) shall function to provide independent review and audit of designated activities in the area 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
- h. quality assurance practices

The members of the NRB will be competent in the area of quality assurance practice and cognizant of the Quality Assurance requirements of 10 CFR 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.

Organization

6.5.2.2 The Chairman, members and alternate members of the NRB shall be appointed in writing by the Executive Vice President - Nuclear, and shall have an academic degree in an engineering or physical science field and in addition, shall have a minimum of five years technical experience, of which a minimum of three years shall be in one or more areas given in 6.5.2.1.

6.5.2.7 Continued

- d. Proposed changes in Technical Specifications or Licenses.
- e. Violations of applicable statutes, codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- g. Reportable Event Reports required by 10 CFR 50.73.
- h. Any indication of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems, or components.
- i. Reports and meeting minutes of the Plant Operations Review Committee.

Audit

6.5.2.8 Audits of facility activities shall be performed under the cognizance of the NRB. These audits shall encompass:

- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per year.
- b. The performance, training and qualifications of the entire facility staff at least once per year.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per six months.
- d. The performance of activities required by the Quality Assurance Program to meet the criteria of 10 CFR 50, Appendix B, at least once per two years.

6.5.2.8 Continued

- e. The Facility Emergency Plan and implementing procedures at least once per year.
- f. The Facility Security Plan and implementing procedures at least once per two years.
- g. The Offsite Dose Calculation Manual and implementing procedures at least once per two years.
- h. The performance of activities required by the Quality Assurance Program regarding the radiological monitoring program to meet the provisions of Regulatory Guide 4.1, Revision 1, April 1975, at least once per calendar year.
- i. Any other area of facility operation considered appropriate by the NRB or the Executive Vice President - Nuclear.

Authority

- 6.5.2.9 The NRB shall report to and advise the Executive Vice President - Nuclear and Office of the Chief Executive, on those areas of responsibility specified in Section 6.5.2.7 and 6.5.2.8.

Records

- 6.5.2.10 Records of NRB activities shall be prepared, approved and distributed as indicated below:
- a. Minutes of each NRB meeting shall be prepared, approved and forwarded to the Executive Vice President - Nuclear within 10 working days following each meeting.
 - b. Reports of reviews encompassed by Section 6.5.2.7.e, f, g and h above shall be prepared, approved and forwarded to the Executive Vice President - Nuclear, within 10 working days following completion of the review.

PBAPS Unit 2

- c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the Executive Vice President - Nuclear, and to the management positions responsible for the areas audited within 30 days after completion of the audit.

PBAPS Unit 2

6.6 Reportable Event Action

6.6.1 The following actions shall be taken for Reportable Events:

- a. The Commission shall be notified pursuant to the requirements of Section 50.73 to 10 CFR 50.
- b. Each Reportable Event Report submitted to the Commission shall be reviewed by the PORC and submitted to the NRB and the Vice President, Peach Bottom Atomic Power 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 provisions of 10 CFR 50.36(c)(1)(i) shall be complied with immediately.
- b. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Vice President, Peach Bottom Atomic Power Station, Plant Manager, and the NRB shall be notified within 24 hours.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PORC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the NRB and the Vice President, Peach Bottom Atomic Power Station within 10 working days of the violation.

6.8 Procedures

6.8.1 Written procedures and administrative policies shall be established, implemented and maintained that meet the requirements of Sections 5.1 and 5.3 of ANSI N18.7-1972 and Appendix "A" of USAEC Regulatory Guide 1.33 (November 1972) except as provided in 6.8.2 and 6.8.3 below.

PBAPS Unit 2

6.8.2 Each procedure and administrative policy of 6.8.1 above, and changes thereto, shall be reviewed by the PORC and approved by the Plant Manager 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 Plant Manager 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.

PBAPS Unit 2

6.10.2 Continued

- d. Records of radiation exposure for all individuals entering radiation control areas.
- e. Records of gaseous and liquid radioactive material released to the environs.
- f. Records of transient or operational cycles for those facility components designed for a limited number of transients or cycles.
- g. Records of training and qualification for current members of the plant staff.
- h. Records of in-service inspections performed pursuant to these Technical Specifications.
- i. Records of Quality Assurance activities required by the QA Manual, except as described in 6.10.1 above.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- k. Records of meetings of the PORC and the NRB.
- l. Records for Environmental Qualification which are covered under the provisions of paragraph 6.16.
- m. Records of analyses required by the radiological environmental monitoring program that would permit evaluation of the accuracy of the analysis at a later date. This should include procedures effective at specified times and QA records showing that these procedures were followed.

6.13 High Radiation Area

- 6.13.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR 20:
- a. Each High Radiation Area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a High Radiation Area and entrance thereto shall be controlled by issuance of a Radiation Work Permit. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:
 1. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
 2. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them.
 3. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over activities within the area and shall perform periodic radiation surveillance at the frequency specified by the plant health physicist or his designee on the Radiation Work Permit.
 - b. Each High Radiation Area in which the intensity of radiation is greater than 1000 mrem/hr shall be subject to the provisions of 6.13.1 (a) above. In addition, locked doors shall be provided to prevent unauthorized entry into such areas and the keys shall be maintained under the administrative control of the Shift Manager, the Shift Supervisor or the Senior Health Physicist.

PSAPS Unit 2

A. Licensee initiated changes:

- 1) Licensee initiated changes shall be reported to the Commission as part of the Modification Report required by 10 CFR 50.59. The discussion of each change shall contain:
 - a. A summary of the evaluation that led to the determination that the change could be made in accordance with 10 CFR Part 50.59;
 - b. Sufficient detailed information to totally support the reason for the change without benefit of additional or supplemental information;
 - c. A detailed description of the equipment, components and processes involved and the interfaces with other plant systems;
 - d. A comparison of the predicted releases of radioactive materials, in liquid and gaseous effluents and in solid waste, to the actual releases for the period prior to when the changes are to be made;
 - e. An estimate of the exposure to plant operating personnel as a result of the change; and
 - f. Documentation of the fact that the change was reviewed and found acceptable by the PORC.
- 2) The change shall become effective upon review and acceptance by both the PORC and NRB.

B. Commission initiated changes:

- 1) The applicability of the change to the facility shall be determined by the PORC after consideration of the facility design.
- 2) The licensee shall provide the Commission with written notification of its determination of applicability including any necessary revisions to reflect facility design.
- 3) The change shall be reviewed by the NRE at its next regularly scheduled meeting.
- 4) The change shall become effective on a date proposed by the licensee and confirmed by the Commission.

6.18.3

"Major Changes" to radioactive waste systems shall include the following:

- A) Changes in process equipment, components, structures and effluent monitoring instrumentation from those described in the Final Safety Analysis Report (FSAR) and evaluated in the staff's Safety Evaluation Report (SER);
- B) Changes in the design of radwaste treatment systems that significantly alter the characteristics and/or quantities of effluents released from those previously considered in the FSAR and SER;
- C) Changes in system design which invalidate the accident analysis as described in the SER; and
- D) Changes in system design that result in a significant increase in occupational exposure of operating personnel.



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. 135
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 19, 1987 as augmented by the information in the report "Plan for Restart of Peach Bottom Atomic Power Station, Section I, Corporate Action" dated November 25, 1987 and in revisions to Section I of the Plan submitted on April 8, 1988 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. 135, 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. The subject changes in the organizational structure are to be completed within ninety (90) days of the issuance of this amendment.

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: June 22, 1988

*6/13/88
APP - Concur subject
to changes as
indicated in SPEC
APP*

*MDV
3/10/88*

*PDI-2/PM
RE Martin:mr
4/11/88*

*OGC
6/14/88*

*PDI-2/D
WButler
6/21/88*

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 135, 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. The subject changes in the organizational structure are to be completed within ninety (90) days of the issuance of this amendment.

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: June 22, 1988

ATTACHMENT TO LICENSE AMENDMENT NO. 135

FACILITY OPERATING LICENSE NO. DPR-56

DOCKET NO. 50-278

Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. The revised areas are indicated by marginal lines.

<u>Remove</u>	<u>Insert</u>
243	243
244	244
245	245
-	245a
246	246
247	247
248	248
248a	248a
249	249
251	251
252	252
252a	252a
253	253
254	254
261	261
262	262
266	266
267	267

PRAPS Unit 3

6.0 ADMINISTRATIVE CONTROLS

6.1 Responsibility

- 6.1.1 The Plant Manager shall be responsible for overall facility operation. In the absence of the Plant Manager, the Superintendent - Operations (or any other person that the Plant Manager 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

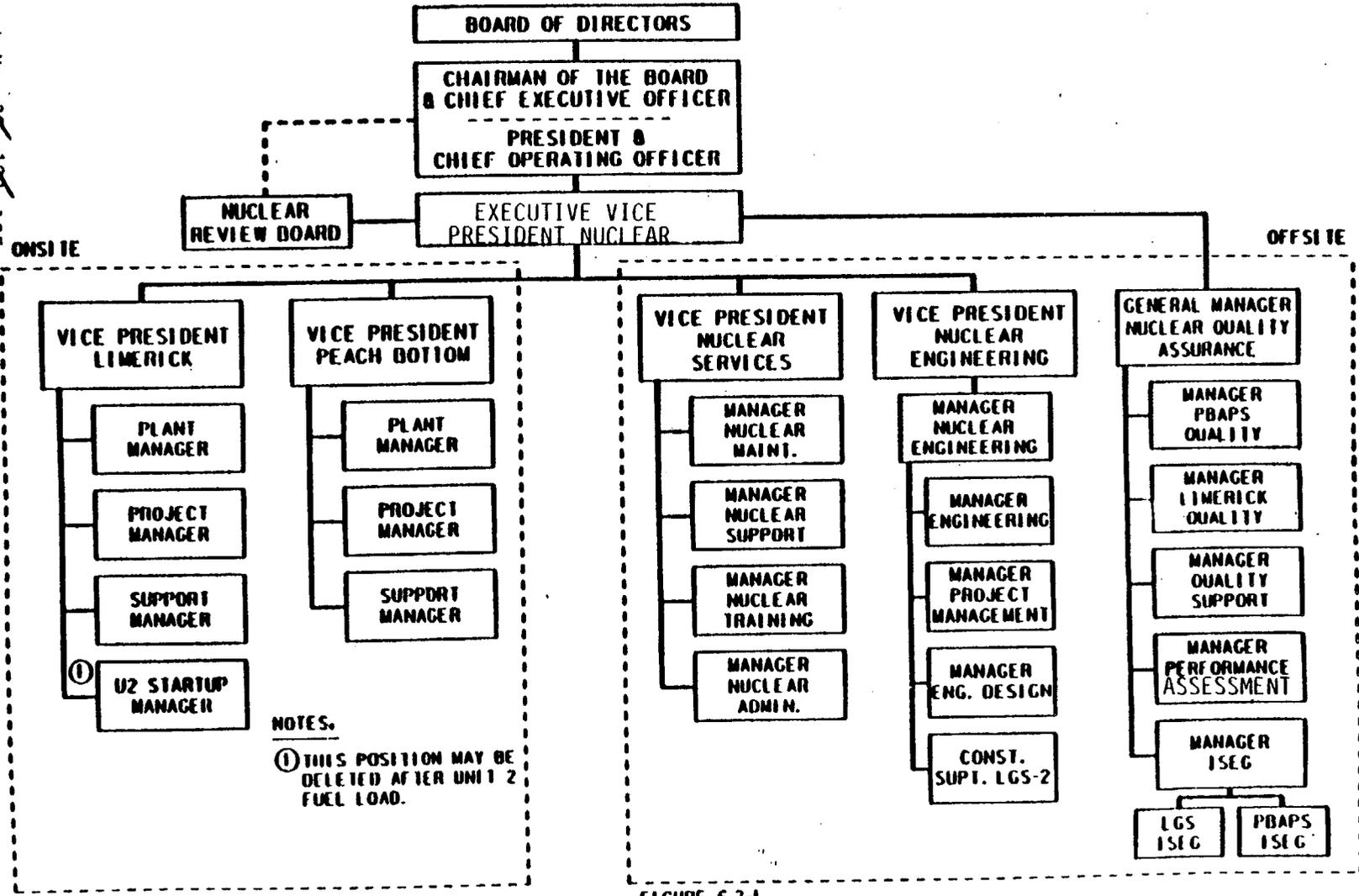
The facility organization shall be as shown on Figure 6.2-2 and:

- 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.

PHILADELPHIA ELECTRIC COMPANY NUCLEAR MANAGEMENT ORGANIZATION CHART

Amendment No. ~~29, 122~~ 135

PBAPS Unit 3

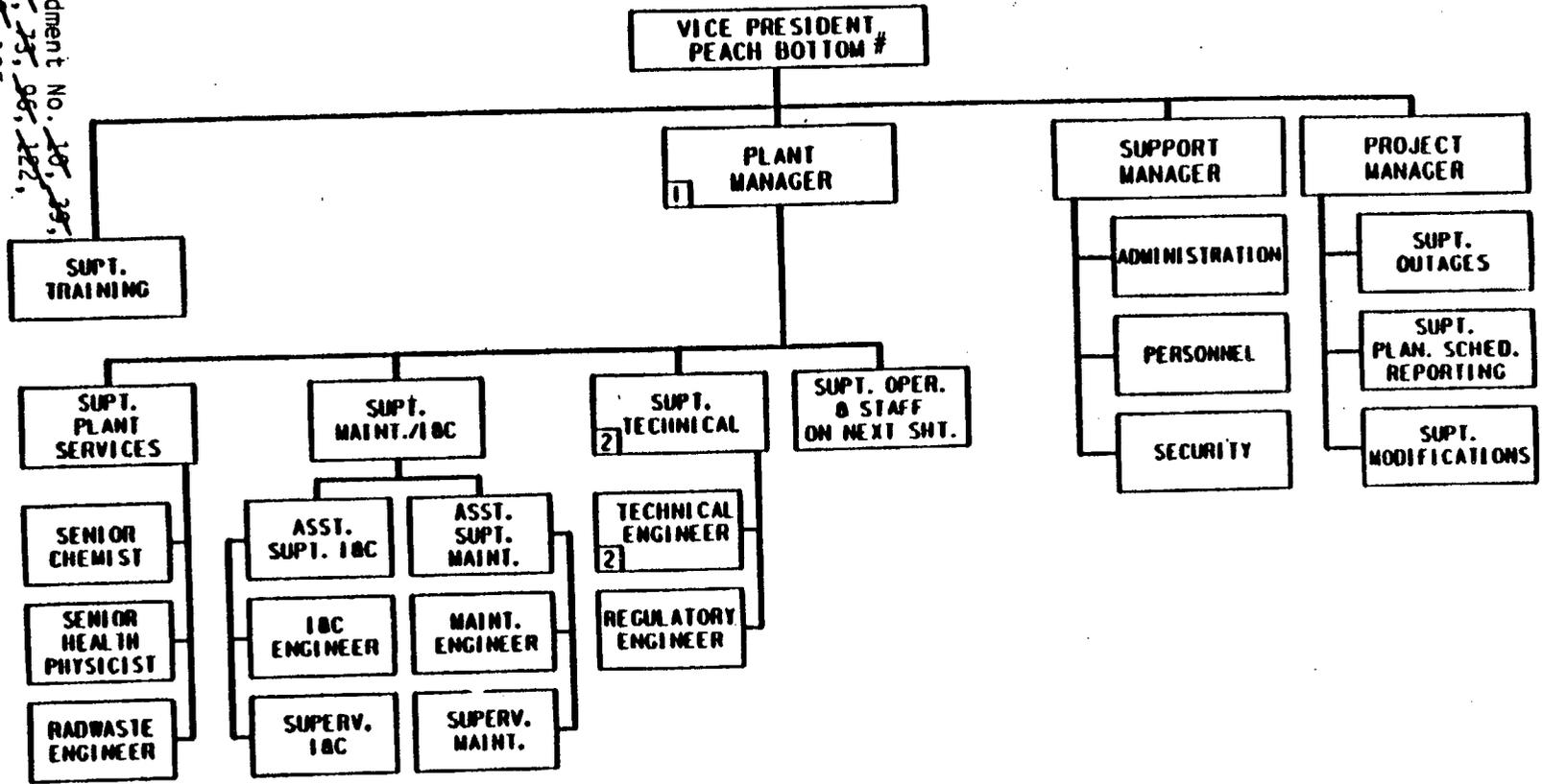


NOTES.
 ① THIS POSITION MAY BE DELETED AFTER UNIT 2 FUEL LOAD.

FIGURE 6-2-1

ORGANIZATION FOR CONDUCT OF PLANT OPERATIONS PEACH BOTTOM ATOMIC POWER STATION

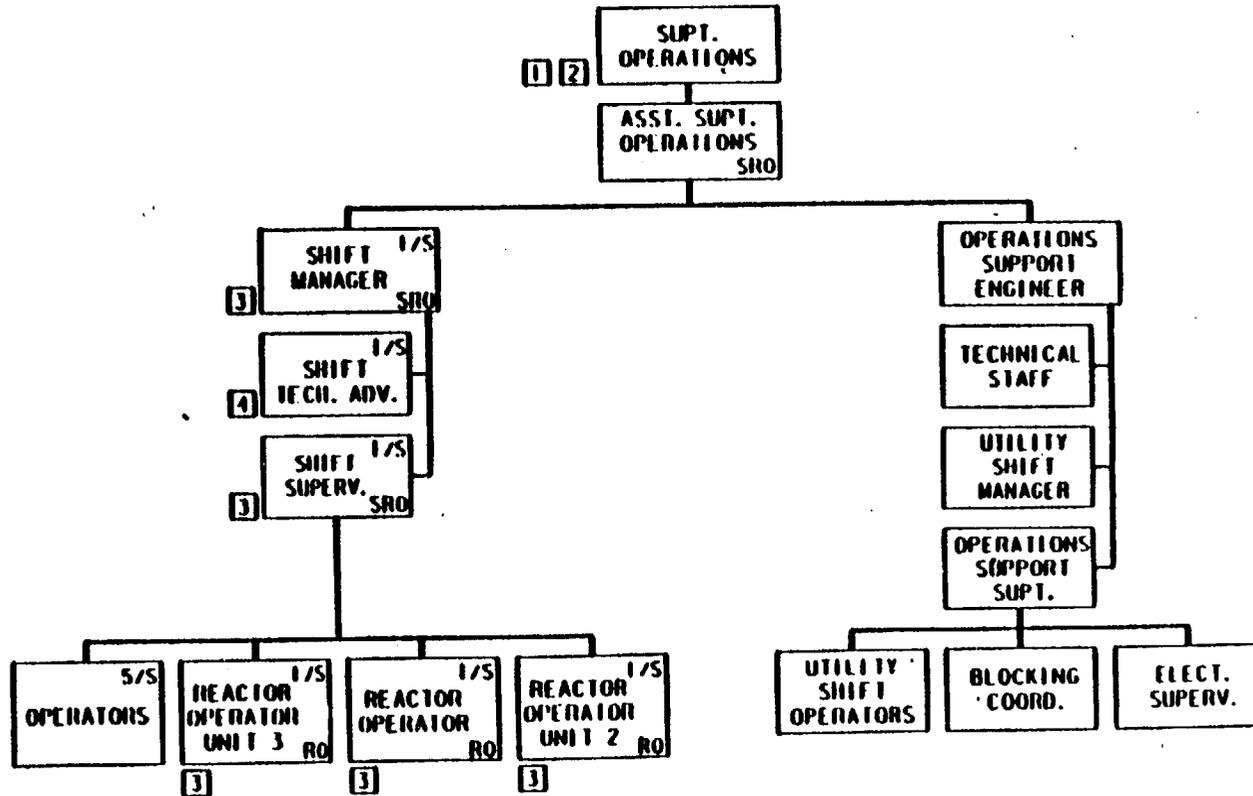
Amendment No. ~~101, 305,~~
~~129, 135,~~ 98, 122,



NOTES.

- ① EITHER PLANT MANAGER OR SUPT. OPER. SHALL HOLD AN SRO LICENSE.*
- ② EITHER SUPT.-TECHNICAL OR TECHNICAL ENGINEER SHALL HOLD AN SRO LICENSE.
- *Except during cold condition operations resulting from the NRC shutdown order of March 31, 1987.
- #Responsible for overall fire protection program

ORGANIZATION FOR CONDUCT OF PLANT OPERATIONS PEACH BOTTOM ATOMIC POWER STATION



NOTES.

- [1] EITHER PLANT MANAGER OR SUPT. OPER. SHALL HOLD AN SRO LICENSE. *
- [2] MAY ASSUME DUTIES OF PLANT MANAGER IN HIS ABSENCE (SEE PAGE 243 PARAGRAPH 6.1.1).
- [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.

LEGEND:

1/S - NO. OF MEN PER SHIFT
 RO - NRC LICENSED REACTOR OPERATOR
 SRO - NRC SENIOR LICENSED REACTOR OPERATOR

6.3 Facility Staff Qualifications

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 Superintendent-Training 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 Operations Review Committee (PORC)

6.5.1.1 Function

The Plant Operations Review Committee shall function to advise the Plant Manager on all matters related to nuclear safety.

6.5.1.2 Composition

The Plant Operations Review Committee shall be composed of the:

Superintendent - Operations (Chairman)
Superintendent - Technical
Superintendent - Maintenance/Instrumentation and Controls
Superintendent - Plant Services
Assistant Superintendent - Operations
Maintenance Engineer
Technical Engineer
Regulatory Engineer
Shift Manager

6.5.1.3 Alternates

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 Operations 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 Plant Manager 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 Plant Manager, the Vice President, Peach Bottom Atomic Power Station, and 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

- i. Review of the Plant Security Plan and implementing procedures, and shall submit recommended changes to the Plan to the Plant Manager and the Nuclear Review Board.
- j. Review of the Emergency Plan and implementing procedures, and shall submit recommended changes to the Plan to the Plant Manager and the Nuclear Review Board.
- k. Review of every unplanned release reportable under 10CFR 50.72 and 50.73, 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 Operations Review Committee shall:

- a. Recommend in writing, to the Plant Manager, for his 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 Vice President, Peach Bottom Atomic Power Station, or in his absence, the Executive Vice President - Nuclear and the Nuclear Review Board of disagreement between the and the Plant Manager; however, the Plant Manager shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

Records

6.5.1.8 The Plant Operations Review Committee shall maintain written minutes of each meeting and copies shall be provided to the Plant Manager; Vice President, Peach Bottom Atomic Power Station, and the Nuclear Review Board.

6.5.2 Nuclear Review Board Function

6.5.2.1 The Nuclear Review Board (NRB) shall function to provide independent review and audit of designated activities in the area 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
- h. quality assurance practices

The members of the NRB will be competent in the area of quality assurance practice and cognizant of the Quality Assurance requirements of 10 CFR 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.

Organization

6.5.2.2 The Chairman, members and alternate members of the NRB shall be appointed in writing by the Executive Vice President - Nuclear, and shall have an academic degree in an engineering or physical science field and in addition, shall have a minimum of five years technical experience, of which a minimum of three years shall be in one or more areas given in 6.5.2.1.

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6.5.2.7 Continued

- d. Proposed changes in Technical Specifications or Licenses.
- e. Violations of applicable statutes, codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- g. Reportable Event Reports required by 10 CFR 50.73.
- h. Any indication of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems, or components.
- i. Reports and meeting minutes of the Plant Operations Review Committee.

Audit

6.5.2.8 Audits of facility activities shall be performed under the cognizance of the NRB. These audits shall encompass:

- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per year.
- b. The performance, training and qualifications of the entire facility staff at least once per year.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per six months.
- d. The performance of activities required by the Quality Assurance Program to meet the criteria of 10 CFR 50, Appendix B, at least once per two years.

6.5.2.8 Continued

- e. The Facility Emergency Plan and implementing procedures at least once per year.
- f. The Facility Security Plan and implementing procedures at least once per two years.
- g. The Offsite Dose Calculation Manual and implementing procedures at least once per two years.
- h. The performance of activities required by the Quality Assurance Program regarding the radiological monitoring program to meet the provisions of Regulatory Guide 4.1, Revision 1, April 1975, at least once per calendar year.
- i. Any other area of facility operation considered appropriate by the NRB or the Executive Vice President - Nuclear.

Authority

- 6.5.2.9 The NRB shall report to and advise the Executive Vice President - Nuclear and Office of the Chief Executive, on those areas of responsibility specified in Section 6.5.2.7 and 6.5.2.8.

Records

- 6.5.2.10 Records of NRB activities shall be prepared, approved and distributed as indicated below:
- a. Minutes of each NRB meeting shall be prepared, approved and forwarded to the Executive Vice President - Nuclear within 10 working days following each meeting.
 - b. Reports of reviews encompassed by Section 6.5.2.7.e, f, g and h above shall be prepared, approved and forwarded to the Executive Vice President - Nuclear, within 10 working days following completion of the review.

PBAPS Unit 3

- c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the Executive Vice President - Nuclear, and to the management positions responsible for the areas audited within 30 days after completion of the audit.

6.6 Reportable Event Action

6.6.1 The following actions shall be taken for Reportable Events:

- a. The Commission shall be notified pursuant to the requirements of Section 50.73 to 10 CFR 50.
- b. Each Reportable Event Report submitted to the Commission shall be reviewed by the PORC and submitted to the NRB and the Vice President, Peach Bottom Atomic Power 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 provisions of 10 CFR 50.36(c)(1)(i) shall be complied with immediately.
- b. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Vice President, Peach Bottom Atomic Power Station, Plant Manager, and the NRB shall be notified within 24 hours.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PORC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the NRB and the Vice President, Peach Bottom Atomic Power Station within 10 working days of the violation.

6.8 Procedures

6.8.1 Written procedures and administrative policies shall be established, implemented and maintained that meet the requirements of Sections 5.1 and 5.3 of ANSI N18.7-1972 and Appendix "A" of USAEC Regulatory Guide 1.33 (November 1972) except as provided in 6.8.2 and 6.8.3 below.

- 6.8.2 Each procedure and administrative policy of 6.8.1 above, and changes thereto, shall be reviewed by the PORC and approved by the Plant Manager 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 Plant Manager 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.

Amendment No. ~~10, 31, 47, 104,~~

~~122~~ 135

Correction ltr of 8/13/86

6.10.2 Continued

- d. Records of radiation exposure for all individuals entering radiation control areas.
- e. Records of gaseous and liquid radioactive material released to the environs.
- f. Records of transient or operational cycles for those facility components designed for a limited number of transients or cycles.
- g. Records of training and qualification for current members of the plant staff.
- h. Records of in-service inspections performed pursuant to these Technical Specifications.
- i. Records of Quality Assurance activities required by the QA Manual, except as described in 6.10.1 above.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- k. Records of meetings of the PORC and the NRB.
- l. Records for Environmental Qualification which are covered under the provisions of paragraph 6.16.
- m. Records of analyses required by the radiological environmental monitoring program that would permit evaluation of the accuracy of the analysis at a later date. This should include procedures effective at specified times and QA records showing that these procedures were followed.

6.13 High Radiation Area

6.13.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR 20:

- a. Each High Radiation Area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a High Radiation Area and entrance thereto shall be controlled by issuance of a Radiation Work Permit. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:
 1. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
 2. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them.
 3. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over activities within the area and shall perform periodic radiation surveillance at the frequency specified by the plant health physicist or his designee on the Radiation Work Permit.
- b. Each High Radiation Area in which the intensity of radiation is greater than 1000 mrem/hr shall be subject to the provisions of 6.13.1 (a) above. In addition, locked doors shall be provided to prevent unauthorized entry into such areas and the keys shall be maintained under the administrative control of the Shift Manager, the Shift Supervisor or the Senior Health Physicist.

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- 1) Licensee initiated changes shall be reported to the Commission as part of the Modification Report required by 10 CFR 50.59. The discussion of each change shall contain:
 - a. A summary of the evaluation that led to the determination that the change could be made in accordance with 10 CFR Part 50.59;
 - b. Sufficient detailed information to totally support the reason for the change without benefit of additional or supplemental information;
 - c. A detailed description of the equipment, components and processes involved and the interfaces with other plant systems;
 - d. A comparison of the predicted releases of radioactive materials, in liquid and gaseous effluents and in solid waste, to the actual releases for the period prior to when the changes are to be made;
 - e. An estimate of the exposure to plant operating personnel as a result of the change; and
 - f. Documentation of the fact that the change was reviewed and found acceptable by the PORC.
- 2) The change shall become effective upon review and acceptance by both the PORC and NRB.

B. Commission initiated changes:

- 1) The applicability of the change to the facility shall be determined by the PORC after consideration of the facility design.
- 2) The licensee shall provide the Commission with written notification of its determination of applicability including any necessary revisions to reflect facility design.
- 3) The change shall be reviewed by the NRE at its next regularly scheduled meeting.
- 4) The change shall become effective on a date proposed by the licensee and confirmed by the Commission.

6.18.3 "Major Changes" to radioactive waste systems shall include the following:

- A) Changes in process equipment, components, structures and effluent monitoring instrumentation from those described in the Final Safety Analysis Report (FSAR) and evaluated in the staff's Safety Evaluation Report (SER);
- B) Changes in the design of radwaste treatment systems that significantly alter the characteristics and/or quantities of effluents released from those previously considered in the FSAR and SER;
- C) Changes in system design which invalidate the accident analysis as described in the SER; and
- D) Changes in system design that result in a significant increase in occupational exposure of operating personnel.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION SUPPORTING

AMENDMENT NOS. 132 AND 135 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 November 19, 1987, Philadelphia Electric Company (licensee or PECO) requested an amendment to Facility Operating License Nos. DPR-44 and DPR-56 for Peach Bottom Atomic Power Station, Unit Nos. 2 and 3. The amendments would modify Section 6 of the facility Technical Specifications to reflect (I) a new corporate and (II) a new plant staff organizational structure, (III) a revised composition of the Plant Operations Review Committee and (IV) several administrative changes. By letter dated November 18, 1987 the licensee also submitted a similar application for the Limerick Generating Station, Unit 1, which it also operates. The licensee's application is submitted to reflect corrective actions taken in response to an Order issued by the Nuclear Regulatory Commission (NRC) on March 31, 1987 which required the plant to be shut down due principally to inattentiveness by control room licensed personnel. The organizational structure is also reflected throughout the licensee's Plan for Restart of Peach Bottom Atomic Power Station (Plan), Section I, Corporate Action, which was submitted on November 25, 1987. The Plan was revised on April 8, 1988 to reflect changes in position titles, clarifications, independent oversight group changes and to provide schedular information. The information in Section I of the Plan, as revised, has been considered by the staff to be supplementary to the licensee's application for amendment.

2.0 EVALUATION

I. Offsite Management and Support Organization, Figure 6.2-1

PECO has established, within the corporate structure, a dedicated nuclear organization with direct management authority and responsibility over all aspects of nuclear operations, engineering, maintenance, and construction. The new nuclear organization will be headed by an Executive Vice President-Nuclear with nuclear responsibilities only. This organization has been formed by separating nuclear engineering, maintenance and other nuclear operations support activities from corresponding fossil and hydro production support activities and reassigning these resources to the newly established dedicated nuclear organization. The positions of Senior Vice

President-Nuclear Power, Nuclear Production Manager, Superintendent-Nuclear Generation Division, Superintendent-Nuclear Services, and Manager-Nuclear Plant have been abolished and the functions under these positions have been reassigned within the new organization under the Executive Vice President-Nuclear. Revision I of the Plan for Restart included a change in the title of the senior nuclear executive to Executive Vice President-Nuclear. The new organization is shown in revised Technical Specification (TS) Figure 6.2-1. Reporting to the Executive Vice President-Nuclear are the Senior Vice President-Nuclear, Vice President-Nuclear Services, Vice President-Nuclear Engineering, General Manager-Nuclear Quality Assurance, Vice President-Limerick and Vice President-Peach Bottom. In addition, the Nuclear Review Board (NRB) reports directly to the Executive Vice President-Nuclear.

The new office of Vice President-Nuclear Services has responsibility for nuclear service activities that support the station. Reporting to the Vice President-Nuclear Services are the Manager-Nuclear Support, Manager-Nuclear Maintenance, Manager-Nuclear Training, and Manager-Nuclear Administration. The Manager-Nuclear Support is responsible for licensing, fuel management, radiation protection, radioactive waste management, nuclear plant chemistry, emergency preparedness, nuclear plant security and the Operating Experience Assessment Program.

The Manager-Nuclear Maintenance is responsible for the supplemental craft maintenance support which serves the maintenance organization at the nuclear facilities. These activities include mobile mechanical maintenance, mobile electrical maintenance, and centralized maintenance services.

The Manager-Nuclear Training is responsible for two branches: the Nuclear Training Section, which has the responsibility for licensed, accredited and general employee training; and the Barbados Training Center, responsible for crafts training for maintenance and construction workers.

The Manager-Nuclear Administration is responsible for coordinating and monitoring activities that support the nuclear organization, including personnel administration, budget and cost control, computer applications, and nuclear records management.

The new office of Vice President-Nuclear Engineering is responsible for management of engineering activities that support the nuclear facilities. Reporting to the Vice President-Nuclear Engineering through the Manager-Nuclear Engineering are the Manager-Engineering, Manager-Project Management, Manager-Engineering Design and the Construction Superintendent, Limerick Generating Station, Unit 2.

The Manager, Engineering is responsible for engineering designs, analyses, studies, assistance and expertise, as required, to support the safe and effective operations of the Company's nuclear units.

The Manager, Project Management is responsible for the management of engineering projects for each station to ensure that all engineering work is defined, planned, scheduled, budgeted, implemented, technically supported and evaluated in a timely and cost effective manner. The Manager, Projects interfaces with each station's Project Manager to coordinate the station implementation of engineering projects.

The Manager, Engineering Design is responsible for providing conceptual design support, engineering design, and drafting services to support the development and implementation of nuclear plant modifications.

The Construction Superintendent, Limerick Generating Station Unit 2 is responsible for planning, scheduling, coordinating, directing and controlling the safety, quality, timeliness and cost effectiveness of all work associated with LGS Unit 2 until fuel loading.

The office of General Manager-Nuclear Quality Assurance (NQA) will be responsible for maintaining an effective Nuclear Quality Assurance Program. Reporting to the General Manager-Nuclear Quality Assurance are the Manager-Peach Bottom Atomic Power Station Quality, Manager-Limerick Quality, Manager-Quality Support, Manager-Performance Assessment and Manager-Independent Safety Engineering Group.

The quality control and quality assurance practices of each site are under the direction of the respective site Managers-Quality. The Quality Support Manager will be responsible for quality activities common to both sites. This includes manuals and procedures, vendor audits and surveillance, training, procurement controls, and oversight of quality activities of Nuclear Engineering and Nuclear Services.

The Performance Assessment Manager will be responsible for ensuring that appropriate performance measurement programs are in place to monitor organizational performance and to provide independent assessment of the effectiveness of the other nuclear organizations.

The Independent Safety Engineering Group (ISEG) Manager is responsible for the examination of plant operating characteristics, NRC correspondence and reports, and other appropriate sources of plant design and operating experience information that may indicate potential areas for improving plant safety. The Manager-ISEG reports to the Executive Vice President-Nuclear through the General Manager-NQA.

The staff reviewed the reporting relationship of the ISEG to the corporate organization with respect to whether adequate paths are provided by the organizational structure for identification of ISEG conclusions to the appropriate corporate management and with respect to whether the ISEG has sufficient independence from the corporate QA functional organization. An assessment of the purposes of the five groups in NQA indicates that three of the groups, PBAPS Quality, LGS Quality and Quality Support perform

functions related to ensuring compliance with regulatory requirements including 10 CFR Part 50, Appendix B. The other two groups, ISEG and Performance Assessment, provide independent assessments and oversight of operations. The NQA organization has thus been expanded beyond being concerned only with classical quality assurance activities. The staff concludes that these aspects of the organizational structure, which include: (a) the independence of the ISEG from the classical quality assurance groups under the General Manager-NQA, (b) the Manager, ISEG reporting to the General Manager-NQA, and (c) the General Manager-NQA's roles as a member of the senior management team reporting directly to the Executive Vice-President-Nuclear and as a member of the NRB, are consistent with the staff's guidance regarding the reporting of ISEG activities to a high level corporate official located offsite who is not in the power production management chain.

The Nuclear Review Board (NRB) is responsible for providing independent review and audit of technical and managerial areas. Its composition is being revised to include outside nuclear executives.

We have reviewed the requested changes and found them acceptable as they meet the acceptance criteria of the appropriate parts of Section 13.1.1 of NUREG-0800, the Standard Review Plan.

II. Onsite Management Organization, TS Figure 6.2-2

PECo has established a new office of Vice President-Peach Bottom Atomic Power Station which will have overall control for the conduct of activities of all organizations at the Peach Bottom site. The Vice President-Peach Bottom Atomic Power Station will be located at the Peach Bottom site. PECO has reassigned current functions and added new functions under a Plant Manager, Support Manager, Project Manager and Superintendent-Training, who all report directly to the Vice President-Peach Bottom. The licensee also proposed to delete the designation of the Nuclear Generation Division (NGD) Superintendent as being responsible for the overall fire protection program. This designation was made in amendment number 39 and the licensee does not provide sufficient specificity in its application regarding how this responsibility will otherwise be met. Therefore this request is denied as stated in the Federal Register (52 FR 48593-48597) on December 23, 1987. Designation of this responsibility will remain with the VP-PBAPS, which is the level of responsibility approximately equal to that of the NGD Superintendent in this regard.

The Plant Manager will be responsible for operating the plant safely, reliably, and efficiently in accordance with all applicable requirements. Reporting to the Plant Manager are the Superintendent Plant Services, Superintendent-Maintenance/Instrumentation and Controls, Superintendent Technical, and Superintendent Operations.

The Superintendent Plant Services will be responsible for management of chemistry, health physics, and radwaste activities. Reporting to the Superintendent will be the Senior Chemist, Senior Health Physicist, and the Radwaste Engineer.

The Superintendent-Maintenance/Instrumentation and Controls will be responsible for the coordination of all maintenance and instrumentation and controls activities. Reporting to the Superintendent-Maintenance/Instrumentation and Controls will be the Assistant Superintendent-Instrumentation and Controls, and the Assistant Superintendent-Maintenance.

The Superintendent-Technical will be responsible for technical support groups, including regulatory matters. Reporting to the Superintendent-Technical will be a Technical Engineer responsible for modifications testing, reactor engineering and plant performance, and the process computer; and a Regulatory Engineer responsible for regulatory and INPO interfaces, the LER program and commitment tracking.

The Superintendent-Operations will be responsible for management oversight of shift operations. Reporting directly to the Superintendent-Operations is an Assistant Superintendent-Operations. Reporting to the Assistant Superintendent-Operations are the Shift Managers and an Operations Support Engineer. The Shift Managers will manage the operations of the plant on their assigned shifts. The Operations Support Engineer provides support to the operating shifts. Reporting to the Operations Support Engineer will be a Technical Staff, Utility Shift Manager and Operations Support Superintendent. The licensee did not propose any change in the interim relief granted by amendments 126 and 129 regarding the holding of an SRO license by either the Plant Manager or the Superintendent-Operations. Therefore, the relief provided by those amendments continues in effect and is shown on Figure 6.2-2.

The Assistant Superintendent-Operations will hold a Senior Reactor Operator License and the Superintendent-Operations or the Plant Manager will hold a Senior Reactor Operator License.

The Support Manager will be responsible for procedures, records management, budget, cost control and ensuring the effectiveness of the site security program. Reporting to the Support Manager will be the Superintendent-Administration and the Coordinators for Security, Personnel, and Budget/Cost Control.

The Project Manager will be responsible for outage, modification, and planning activities. Reporting to the Project Manager will be a Superintendent-Outages, Superintendent-Planning, Scheduling, and Reporting, and a Superintendent-Modifications.

The Superintendent-Training will be responsible to identify the programmatic training needs of site personnel, to ensure the effectiveness of training programs, and to incorporate operating experience into training and to monitor participation.

We have reviewed the requested changes and found them acceptable as they meet the acceptance criteria of the appropriate parts of Section 13.1.2-13.1.3 of NUREG-0800.

III. Plant Operations Review Committee (PORC), Section 6.5.1

PECo has revised the composition of the PORC because of the revised plant organization. The revised PORC membership is the Superintendent-Operations as Chairman, Superintendent-Technical, Superintendent-Maintenance/Instrumentation and Controls, Superintendent-Plant Services, Assistant Superintendent-Operations, Maintenance Engineer, Technical Engineer, Regulatory Engineer and a Shift Manager.

In addition, the name of the committee has been changed from Plant Operation Review Committee to Plant Operations Review Committee.

We have reviewed these changes and find them acceptable as they meet the acceptance criteria of the appropriate part of Section 13.4 of NUREG-0800, the Standard Review Plan.

IV. Miscellaneous and Editorial Changes

PECo has made numerous revisions to reflect title changes in the revised organization, made editorial changes and has updated several references.

Title changes have been made in Sections 6.1.1, 6.4.1, 6.5.1.1, 6.5.1.6, 6.5.1.7, 6.5.1.8, 6.5.2.2, 6.5.2.7, 6.5.2.8, 6.5.2.9, 6.5.2.10, 6.6.1, 6.7.1, 6.8.2 and 6.8.3.

Editorial changes have been made to Section 6.5.1.6 and Section 6.7.1 has been revised to reflect current requirements.

We have reviewed these changes and find them acceptable as they reflect the revised organization and are consistent with current requirements.

3.0 Final No Significant Hazards Consideration Finding

The Commission has made a proposed determination that the amendments involve no significant hazards consideration, which was published in the Federal Register (52 FR 48593) on December 23, 1987 and consulted with the Commonwealth of Pennsylvania. In Section IV of its submittal

"Commonwealth of Pennsylvania's Petition To Intervene, Request For Hearing and Comments Opposing No Significant Hazards Consideration" dated January 22, 1988 the Commonwealth provided comments on the staff's proposed no significant hazards consideration determination (NSHC). Under the Commission's regulations in 10 CFR 50.92, an amendment request involves NSHC if operation of the facility in accordance with the proposed amendment will 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.

In its proposed NSHC determination the staff assesses whether each of four categories (I. Corporate Organization Structure, II. Plant Staff Organization Structure, III. Plant Operations Review Committee, and IV. Administrative Changes) of changes in the proposed amendment involve NSHC. No specific comments were provided regarding why Pennsylvania finds that the Category I and II changes involve SHC and no specific comments were provided on the Category III and IV changes. Accordingly, the staff affirms its earlier proposed findings and reaches a final finding that these changes involve NSHC as set forth in parts 1-10 below. Also included is a discussion of the comments by Pennsylvania in Section IV of its submittal.

(1) The changes discussed above in Section I regarding the corporate organization are proposed to shorten and strengthen the nuclear operations chain of command, provide an onsite corporate presence and ensure that all onsite employees, except independent oversight functions, are accountable to the site vice president, establish support and engineering organizations that are focussed on nuclear related activities only, enhance and elevate Quality Assurance's role, strengthen the operating experience assessment program and to strengthen the independent assessment process. Accordingly, the staff believes that these changes are directed at bringing about improvements that will provide further control of plant operations and thus will not involve a significant increase in the probability or consequences of the accidents previously evaluated in the Updated Final Safety Analysis Report. For example, the reorganized Quality Assurance function under the General Manager-Nuclear Quality Assurance will include an interface of the QA activities at each site with the corporate QA group and the results are provided with a higher level of visibility. Independent assessment of operational performance and trend analysis of performance will be performed and will have a higher level of visibility. Therefore, on the bases discussed above and in Section I, the changes will not involve a significant increase in the probability or consequences of any accident previously evaluated.

(2) The changes discussed above in Section I regarding the corporate organization do not involve any physical modifications in plant hardware, plant design or plant systems operation. For this reason and for the

reasons stated in part (1) the changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

(3) The objective of the corporate reorganization is to change the organizational structure to increase control, accountability and corporate direction for nuclear operations, to strengthen self-assessment and problem resolution capabilities and to strengthen the independent assessment process. Since the changes are directed at providing the improved features and enhancements discussed in part (1) above, they do not involve a significant reduction in a margin of safety.

(4) The changes discussed above in Section II regarding the onsite organization are made to provide a strong corporate presence onsite; to provide separate management accountability and authority for plant operations through the Plant Manager, and outage management through the Project Manager; to ensure more attention and responsiveness to site training needs through the Superintendent-Training; and to provide strengthened management focus and accountability for critical station support functions through the Support Manager. The licensee states that this will eliminate various administrative responsibilities from the Plant Manager, thereby allowing more focus on daily plant activities. The organization will further provide the Plant Manager with a staff that, as discussed in Section II above, will be expanded horizontally to include the Superintendents of Plant Services, Maintenance and Instrumentation and Controls, Technical and Operations. This is directed at establishing a separation of responsibility that will enable concentration on each organizational function. The proposed organization will provide better functional grouping of related disciplines through the Superintendents of Plant Services and Maintenance, Instrumentation and Controls and will provide for onsite management of construction, field engineering, testing and maintenance crafts.

The licensee states that the organization under the Superintendent-Operations will establish additional supervisory positions, including implementation of the Shift Manager concept, and a division of responsibility that will enhance management-operator interaction. Flexibility would also be provided to accommodate periodic rotation and alternative career paths for shift personnel. This is directed at enhancing operator morale and motivation and improving the professionalism of the operations organization.

The changes do not involve physical changes in the design or operation of plant structures, systems or components. For this reason and for the reasons discussed above and in Section II above, the changes will not involve a significant increase in the probability or consequences of any accident previously evaluated.

(5) The changes discussed above in Section II regarding onsite organization do not involve any physical changes in the design or operation of plant structures, systems or components. For this reason and for the reasons stated in part (4) above, the proposed changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

(6) As discussed in part 4 above, the objective of the onsite organization is to provide resources to strengthen the focus and accountability for plant activities, to provide better functional grouping of related disciplines and to enhance management-operator interaction and improve the professionalism of the operations organization. For these reasons and as discussed in Section II and part 4 above, the changes do not involve a significant reduction in a margin of safety.

(7) The changes discussed above in Section III regarding the Plant Operations Review Committee are made to increase the role of maintenance and operations; to decrease the role of disciplines not directly involved with operational safety; and to maintain a representation of the required technical disciplines. The PORC composition also reflects the revised titles for certain positions. Therefore, on the bases discussed above and in Section III, the changes will not involve a significant increase in the probability or consequences of any accident previously evaluated.

(8) The changes discussed above in part 7 and Section III regarding the PORC do not involve any physical changes in the plant structures, systems and components. For this reason and for the reasons stated in part 7 above, the proposed changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

(9) The objective of the revisions is to reflect the enhancements that have been proposed for the onsite organizations and to increase the emphasis on the roles of maintenance and operations in the PORC reviews. The PORC quorum requirements are unchanged. On these bases, the changes do not involve a significant reduction in a margin of safety.

(10) The changes discussed above in Section IV include miscellaneous administrative revisions in nomenclature, corrections of errors, addition of a reference to another TS paragraph, and specification of a reporting time. The changes proposed by the licensee in this category dealing with the responsibility for the fire protection program have been denied for the reasons stated in Section II. The licensee has reviewed these miscellaneous administrative changes and concludes that they do not involve a significant increase in the probability or consequences of an accident previously evaluated since the accident analyses in the Updated Final Safety Analysis Report are not affected by the proposed miscellaneous changes. The licensee also concludes that these changes do

not create the possibility of a new or different kind of accident from any previously evaluated because "The implementation of these miscellaneous changes will not affect the interpretation or intent of the specifications they involve. Operating procedures and design of the plant will not be impacted, as a result of implementation." The licensee also concludes that the proposed miscellaneous changes do not involve a significant reduction in a margin of safety because "The administrative nature of these changes will not impact plant systems or operation." The staff has reviewed and agrees with the licensee's proposed determination and finds that these changes do not involve significant hazards considerations.

Based on the above discussions in Section I, II, III and IV and Parts 1-10 the staff has reached a final finding that the requested amendment does not involve a significant hazards consideration.

Pennsylvania's Comments

Pennsylvania comments that the focus of the determination to be made under the criteria of 10 CFR 50.92 should be the problem, not the solution, and offers its reading of the legislative history of the "Sholly" amendments as support for this proposition. Petition at 13. Pennsylvania points to the House Conference Report (No. 97-884, 97th Cong., 2nd Sess. 37, reprinted in (1982) U.S. Cong. and Ad. News 3607) as stating that a no significant hazards consideration determination should represent a judgment on the nature of the issues raised by the license amendment rather than a conclusion about the merits of those issues. The NRC staff does not disagree with these generalizations regarding the legislative history of the "Sholly" amendments. However, the Staff disagrees with Pennsylvania's characterization of the issues raised by these amendments. Pennsylvania comments that these issues are whether the proposed amendments are adequate to make operation of the plant safe in light of PECO's problems. The Staff regards the amendments at issue here as not having nearly so broad a scope. The complete scope of the problems applicable to PBAPS operations at the time of the shutdown order go well beyond consideration of what an appropriate organizational structure would be. An appropriate organizational structure can contribute to an acceptable level of plant performance but other criteria must also be met to provide an overall assurance of acceptable plant performance. Nevertheless, in view of the previously acknowledged concerns with the licensee's management at the PBAPS, the organizational structure changes proposed by the licensee have been considered with respect to whether they appear responsive to organizational problems that may have contributed to the PBAPS deficiencies. The staff believes that such principal features of the reorganization as the consolidation of separate quality assurance and oversight functions into one integrated group, greater emphasis on operations related issues, more defined paths for communicating problems to corporate management and improved plant staffing resources to facilitate focussing on specific work disciplines have significant potential to contribute to improved levels of performance.

Coincidentally, the staff has also recently expressed its views on the issue of organizational structure in Generic Letter 88-06, "Removal of Organization Charts from Technical Specifications" dated March 22, 1988, wherein the staff states "It has been the staff's experience that organization charts by themselves have been of little help in ensuring that the objectives of administrative control requirements are met". The Generic Letter provides that such charts may be removed from the Technical Specifications subject to the addition of general requirements that capture the essential aspects of the organizational structure.

The scope of the issues to be reviewed by the Commission in conjunction with any decision on restart of the plant will include such issues as are identified in the Shutdown Order and in the licensee's responsive corrective action plan.

Pennsylvania states that issuance of the proposed amendment would circumvent the Petitioner's right to a hearing. However, the Federal Register (52 FR 48593-48597) Notice of Consideration of the amendment application states that, upon a final determination that the amendment involves NSHC, the amendment may be issued and any hearing held will take place after issuance of the amendment.

Pennsylvania provides other comments on the proposed NSHC determination not specifically directed to the changes in Categories I-IV. These include the adequacy of the design basis accident spectrum for PBAPS and station blackout. Although these comments are beyond the scope of the subject license amendment on organizational structure, a brief response to them is provided below. However, before going beyond the scope of the proposed amendment, the staff notes that it believes that the enhanced management oversight and involvement provided by the proposed changes will strengthen management's ability to assure proper performance of operations and thereby enhance plant safety.

Pennsylvania's comment essentially questions the adequacy of the design basis accident evaluations in that they fail to account for impairment of operator performance. The plant has been designed and constructed with the objective that the results of the design basis accidents, as analyzed in the Updated Final Safety Analysis Report, would meet defined acceptance criteria. Pennsylvania implies that a low level of operator performance, such as described in the Petition, is not consistent with the general level of performance expected of the licensee when the design basis accidents were analyzed. On this, the NRC staff would agree and that is a principle reason that the plants were directed to be shutdown. The NRC will not permit a return to operations until an appropriate level of performance and, accordingly, an adequate level of protection in this regard from the design basis accidents can be assured. However, any decision to authorize the resumption of operations goes well beyond the scope of the subject license amendment and will not be reached through the issuance of the license amendment.

Pennsylvania sets forth the possibility of a station blackout as part of its basis for concluding that new and different kinds of accidents from any previously evaluated would be introduced by operation pursuant to the license amendment. Specifically, Pennsylvania refers to the Commission's SALP report of September 8, 1987, which discusses diesel generator maintenance trends and the updating of vendor manuals. This is followed by the general claim that the licensee's management problems may lead to failure to maintain its diesel generators and thereby create the possibility of an accident the Commission previously considered too remote for consideration. Pennsylvania does not mention that the subject SALP report also indicates that maintenance is conducted efficiently and that the availability of the diesel generators remains high. The issues involving possible trends in diesel generator support equipment maintenance levels have been responded to by the licensee and are under review. The diesel generator manual update project has recently provided the licensee with a complete draft of the updated manual. In summary, the resolution of these issues is proceeding; the staff has not observed any recent trends which suggest that there is a significant change in diesel generator availability.

Pennsylvania also implies that no consideration has been given to dealing with potential station blackout occurrences. However, as noted in its reply dated September 25, 1987 to Inspection Report No. 86-25, the licensee does have such procedures and will complete its most recent revision of the procedures and the associated operator training in 1988.

The staff responds to Pennsylvania's comments on specific technical aspects of the station blackout issue despite Pennsylvania's failure to connect the perceived increase in risk of station blackout to the management structure change that is the subject of the amendments.

Pennsylvania comments that because the adequacy of the proposed solutions will determine the safety of the plant, the amendments raise significant safety issues. Petition at 14. However, 10 CFR 50.92 sets forth a three-part test for determining whether an amendment involves a significant hazards consideration. These amendments do not, since they do not introduce a new or different kind of accident, nor significantly increase the probability or consequences of an accident previously evaluated, nor significantly lower the margin of safety. Pennsylvania's comments notwithstanding, there is no direct relationship between any identified or identifiable significant hazard consideration and the amendments at issue. Accordingly, the staff reaffirms its earlier proposed NSHC determination.

4.0 ENVIRONMENTAL CONSIDERATIONS

These amendments involve a change to 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 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 48593) on December 23, 1987 and consulted with the Commonwealth of Pennsylvania. The Commonwealth of Pennsylvania provided comments on the proposed no significant hazards consideration determination in a submittal dated January 22, 1988. The staff discusses these comments in Section 3.0 above and reaches a final finding that these amendments involve no significant hazards considerations.

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: R. E. Martin, F. Allenspach

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