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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION I  
631 PARK AVENUE  
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07 JUL 1987

MEMORANDUM FOR: W. T. Russell, Regional Administrator  
FROM: W. F. Kane, Director, Division of Reactor Projects  
SUBJECT: MEETING SUMMARY ON PEACH BOTTOM RESPONSE TO SHUTDOWN ORDER

On June 17, 1987 Regional and Headquarters representatives met with Philadelphia Electric Company (PECO) at the Peach Bottom site to discuss the status of the licensee response to the Shutdown Order for operator inattentiveness. Areas covered included Nuclear Operations Monitoring Team (NOMT) activities and the licensee's Commitment to Excellence Program (CEP) currently under development whose elements include training, a new shift organization and a review of essentially all plant procedures. The licensee indicated that the MAC diagnostic report was nearly complete and would be provided to the NRC in early July after the completion of independent reviews. In addition, the internal security investigation was complete and about 90% of the interview data had been provided to the NRC. Finally, the licensee indicated that the SRO licensed shift engineer training program was in its final phase involving 40 hours on shift under instruction during the current week.

In discussing NOMT activities, the licensee indicated that no new control room behavior problems had been identified since the May 15, 1987 meeting. In addition, the SRO who had thrown his hard hat down in the control room as discussed in my June 9, 1987 memorandum had voluntarily resigned. During the Unit 2 fuel load activities, oversight activities of the NOMT will be expanded to include verification of technical requirements in addition to control room behavioral requirements.

The Assistant to the President provided an overview of the CEP. He is responsible for the plan and schedule as well as oversight of MAC activities. The Manager of Nuclear Generation is responsible for oversight of training aspects of CEP and the MAC diagnostic report. The Plant Manager is responsible for shift organization aspects and for oversight of the procedure reviews which will be directed by the SRO licensed Startup Manager from Limerick Unit 2. The CEP process will involve identification of issues, which is well underway, definition of requirements (PECO responsibility at doer level, categorization, resource requirements, and impact analysis), which is in its infancy, implementation and monitoring. The CEP scope will be defined by Regulatory, INPO, ANI, MAC and licensee requirements and recommendations.

The Manager, Nuclear Generation described the training aspects of the program. The rehabilitation training program described in our May 15, 1987 meeting was scheduled to begin for the first half of the eligible licensed operators on

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June 29, 1987 and run for six weeks followed by the second half. At the conclusion of these programs, a condensed program of about 3 weeks for the new Shift Managers is planned. Finally, a one week program on the procedure upgrades is anticipated prior to restart. The licensee believes that these sequential training programs of about 16 weeks will be the critical path to restart. In October eight NRC license exams are scheduled including four ROs and 4 SROs. One of the SROs is the designated replacement for the Operations Superintendent. By mid July the licensee hopes to start a license class for about 14 people with the equivalent of Navy enlisted nuclear experience or a two year associates degree in a technical field. Currently, the licensee has decided that none of the existing shift superintendents will continue to perform licensed duties during the restart. In addition, three other licensed individuals will not resume licensed duties during the restart. All others currently licensed will be subject to licensee review of their corporate security investigation results and screening by an industrial psychologist. The licensee plans to staff the first generation of shift managers from among the eight SRO licensed engineers who will complete their four week retraining program with the 40 hours under instruction by June 19, 1987.

Next the new plant manager outlined the planned new operating organization. The new shift managers, assistant operations engineers (3 are planned instead of the previous 2), and an equipment superintendent (probably a former shift superintendent) would report to the operations engineer. Reporting to the new shift manager would be the shift technical advisor, two SRO licensed shift supervisors (initially one until additional people can be licensed), a non-licensed floor shift supervisor to whom the non-licensed operators would report, a day work superintendent (probably a former shift superintendent), the shift clerk and on-shift representatives of other departments. In the long term there would be four licensed ROs reporting to the shift supervisors instead of the current three to add flexibility and reduce overtime. Working for the day work superintendent would be an existing electrical supervisor and an SRO licensed blocking coordinator. Under the blocking coordinator would be RO licensed permit writers and non licensed blockers. The added licensed positions in the organization would enable the licensee to reduce overtime and provide a way to give licensed people periodic relief for several months from the shift work routine in the day work positions. The added licensed operators on shift would permit operators to rotate through the required posts during the shift giving periodic relief from boredom and to provide for adequate staffing without the use of overtime due to unforeseen absences.

The last element of the CEP involves a global overhaul of the Peach Bottom procedures. The effort will be headed by the current Limerick Unit 2 Startup Manager who is a licensed SRO at Limerick 1. The procedure upgrade will factor in ongoing departmental programs and will be done primarily by vendors on site. The program will focus on management review and control, and assurance of procedure awareness and compliance in addition to upgrading the technical content of procedures.

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The meeting was concluded by acknowledging the importance of the dialogue to keep abreast of the licensee's plan as it develops and noting several issues for consideration by the licensee in developing the CEP. These issues involved concerns about having licensed operators reporting to former shift superintendents in the new organization, the hot operating experience of the new organization during restart, the direction of shift rotation and the need for increased planned activities on shifts where control room activity is normally low. The NRC asked that the next meeting be held about 10 days after the licensee submits their recovery plan.



W. F. Kane, Director  
Division of Reactor Projects

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