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March 5, 1980

Mr. Lawrence P. Crocker
NRC Division of Project Management
Office of Nuclear Reactor Regulation
Washington, D. C. 20555

Dear Mr. Crocker:

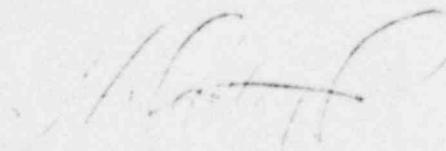
We appreciate the opportunity to comment on the NRC draft "Criteria for Utility Management and Technical Competence". This document will have significant impact in many areas of plant operation and, while we apologize for the delay in submitting our comments, we hope they will be considered.

As you will see in some of our specific comments, we believe that the thoughts expressed in this document impact directly on the tasks the industry has assigned to INPO and, to a lesser degree, NSAC. We recommend, as an overall comment, that meetings be held with representative industry groups so that these criteria may be adapted to the various management schemes with minimal disruption. It is our belief that change for the sake of change is counter productive to safe operation.

While neither inclusive, nor exclusive, we hope the attached comments will convey some indications of our concerns as we view the criteria at this time.

If we can be of any further assistance, or may have the opportunity to elaborate on our comments, we would be pleased to do so.

Sincerely,



Attachment

cc: John J. Kearney

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Philadelphia Electric Company Comments

Criteria for Utility Management & Technical Competence

Page 4 - Criteria for Routine Operations

Many organizational arrangements are functionally equivalent. For example, some licensees may elect to have other departments within the company supply services which might be considered plant staff functions by other licensees. Therefore, statements such as "The plant staff is considered to be those persons that report to the plant manager" must be used with caution or qualified. Figure 1, should show, perhaps by asterisk, that certain jobs such as training manager, maintenance manager, and plant chemist, may report off-site for administrative purposes.

Page 7 - b (1)

The support to the plant staff from support divisions and departments of the licensee should be considered appropriate and we see no rationale for requiring specific disciplines at the site such as those listed.

Page 7 - Shift Technical Advisor

We understand the Shift Technical Advisor is meant to be a temporary assignment with the intent that the operating staff will ultimately be upgraded to fulfill this function. Therefore, we suggest that reference to the Shift Technical Advisor be deleted.

Page 8 - Shift Crew

The requirement for a shift crew which includes five men in a two unit control room, two of whom must be senior licensed operators, is counter productive and not supported by the industry operating experience. As long as appropriate overall staffing is provided, requirements which fix men in the control room area impede not only appropriate utilization of manpower, but do not, in our opinion, contribute to improved safety.

Page 9 - (h)

The section on scheduled work periods is too restrictive. There should be provisions for making exceptions during unforeseen or unanticipated occurrences.

Page 10-12 - On-Shift Technical Requirements

We understand that this section will require assignment of graduate engineers and graduate technicians to the plant staff in significant numbers, and with unique expertise. The requirement is unduly restrictive and there has been no demonstration of such a need in the general industry experience. Certain headings under this section are more applicable to one type of reactor (refer, for instance, to boron control, under Chemistry) and yet such uniqueness is not called out, nor exception provided.

Page 12 - Technician-Maintenance Resources

Technicians, repairmen, and inspectors, etc. should only be assigned to the plants and not the plant staff. They can report to off-site divisions for administration. This is particularly applicable to utilities with more than one nuclear plant.

Page 13 - Training

This requirement is ambiguous and could be read to intend that persons be retrained in their formal education disciplines; i.e., engineers retrained in basic engineering. It is our opinion that this requirement, as well as others in this document, will be addressed by INPO. We believe the Commission should avoid prejudging and dictating those requirements which will be part of the INPO effort.

Page 14 - Organization

As we have previously commented, organizations must be functional to satisfy the operational and safety requirements of nuclear power plants. Such requirements as "establish an integrated organizational arrangement" are too restrictive and result in unnecessary duplication of manpower requirements, without compensatory improvements in operation or safety.

Page 15 - Utility Organization

The characteristics of the organization depicted in Figure 2, can be met without having a specific Nuclear Power organization, as indicated in this organization chart.

Page 18 - Onsite Safety Review Group

The AIF Subcommittee on Operations has recommended against the establishment of an onsite safety review group and we concur with that recommendation.

Page 19 - Composition of Review Group

The suggestion that "Shift Technical Advisors be assigned to this review group" would result in confusion as to the reporting responsibility of the Shift Technical Advisors.

Page 19 - Functions of Review Group

In our opinion all of the functions described under this heading are presently adequately accomplished by the on-site and off-site review groups. We, particularly, recommend against the assignment to such a review group of "Evaluation personnel changes in key management positions and evaluation of changes in plant organizational structure", as stated on page 21, since this is clearly a corporate management function. We believe that such a group would be detrimental to nuclear safety because there is more likelihood that important safety items will be overlooked when divided responsibilities exist.

Page 22 - Senior Management Oversight Group

We believe that this function is presently being adequately addressed by the off-site review group which is established at an appropriate management level. The functioning of a vice presidential level group, which is other than advisory to the Chief Operating Officer, would be awkward in most organizations.

Page 23 - Off-site Technical Staff Resources

Many of our comments of the on-site staff resources are applicable, particularly those relating to single person assignments of responsibility and requirements that all facets be covered without use of outside support.

Page 24 - (5)

Qualification requirements such as "Bachelor's Degree and 6 years of experience in power plant operation and/or design" are not universally appropriate to all the listed technical abilities.

Page 26 - Outside Contractual Assistance

The identification of contractual requirements is inappropriate and there is no evident connection between these requirements and plant safety.

Page 27 - Criteria for Accident Conditions

The material contained in this section has been promulgated in several other areas and we believe the Commission should refrain from duplicating its requirements since duplications are usually not identical and, therefore, result in confusion. For example, the reading of the material contained herein infers that, basically, the entire plant staff must reside less than one hours travel time to the plant and, on page 38, there is an apparent requirement that all operating personnel live within

one hour of the plant, since an additional full shift complement must be available within that time frame. Further, under the heading "Administrative Manager", on page 35, the requirement that he have a minimum of two years experience in procurement is an example of a seemingly innocuous requirement which would be difficult to meet, without a specific two year assignment, in most organizations.

Page 36 - Table 1

We recommend that the Commission consider, carefully, the experience requirements listed in this table, since the obtaining of, e.g., 6 months experience in hydraulic transient analysis is unique and very difficult to meet.

Page 38 - Operational Support Center

We believe that a literal reading of the requirements of (3) Operating Personnel and (5) Security Force would require complete double staffing of the plant.

Page 41 - Offsite Resources and Activities

The requirement that the Public Information Manager and the Site Support Manager shall operate from the Emergency Operations Center is unduly restrictive in that there are many Emergency Organization arrangements which will function as well and, in some cases, depending on the corporate structure, better than the one suggested.

Page 42 - Organization

The designation that the Vice President - Nuclear Power be the Recovery Manager is unduly restrictive and may, in fact, depending on the Emergency Organization structure, not be the most appropriate assignment.

Page 43 - Management Resources

The requirement that the Recovery Manager be available within two hours is unduly restrictive and the necessity of this requirement has not been demonstrated.

Page 48 - Public Information Manager

The requirement that the Public Information Manager have two years experience in public/press relations is an unsupported requirement. Further, basing experience equivalence on the length of a training program is no indication of the scope of training received.

Page 50-51 - Tables 2 and 3

The training requirements and experience requirements on these tables are arbitrary and unduly restrictive. For example, the rationale for a B.S. in Computer Sciences and the experience listed for process computers is not at all evident.