



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 35 TO FACILITY OPERATING LICENSE NO. NPF-39

PHILADELPHIA ELECTRIC COMPANY

LIMERICK GENERATING STATION, UNIT 1

DOCKET NO. 50-352

1.0 INTRODUCTION

By letter dated July 11, 1989, as supplemented by letter dated November 3, 1989, Philadelphia Electric Company (the licensee) requested an amendment to Facility Operating License No. NPF-39 for the Limerick Generating Station, Unit 1. The supplemental letter does not change the intent of the original request. The proposed amendment would revise the Technical Specifications (TSs) in response to NRC Generic Letter (GL) 88-06 "Removal of Organization Charts from technical Specification Administrative Control Requirements" to: 1) remove the onsite and offsite organizational charts from TS Section 6.2.1 and 6.2.2, respectively and 2) make certain miscellaneous administrative changes in Section 6 of the TSs (Administrative Control) related to revisions to the corporate organization. The five proposed miscellaneous administrative changes would: 1) revise paragraphs in Sections 6.2 and 6.5 to reflect the new organization under the Executive Vice President-Nuclear, 2) revise paragraph 6.5.2.1 to indicate that the Nuclear Review Board (NRB) reports to and advises the Executive Vice President-Nuclear, 3) revise paragraph 6.5.2.9.C to indicate that NRB audit reports shall be forwarded to the Corporate Officer(s) responsible for the areas audited, 4) revise paragraphs 6.2.3.2 and 6.2.3.4 to reflect title changes and the deletion of the corporate Independent Safety Engineering Group (ISEG) and 5) revise paragraph 6.14.2 to reflect the groups responsible for technical review of the Offsite Dose Calculation Manual.

2.0 EVALUATION

The removal of organizational charts from the TS is an improvement that was proposed on a lead-plant basis for the Shearon Harris plant and was endorsed by the Westinghouse Owners' Group. The NRC approved this change for Shearon Harris on January 27, 1988. This change was reviewed as part of the NRC's program, for improvements in TS. The objectives of that program were established by the NRC's "Interim Policy Statement on TS Improvements." As a result of these efforts, NRC GL 88-06 was issued on March 22, 1988 which encouraged licensees and applicants to propose changes to their TS to remove the organizational charts from the TS and replace them with descriptions of the organizational structure and characteristics which are important to safety. The proposed changes concern the Administrative Controls in Section 6.0, and do not affect any Limiting Conditions for Operation or Surveillance Requirements.

The LGS Unit 1 onsite and offsite organizations are defined by organization charts included under administrative control requirements of the TS. Generic Letter (GL) 88-06 provided guidance which addresses amendments that may be proposed for removing organization charts from the TS.

Many of the details shown on the onsite and offsite organization charts are not essential to the safe operation of the facility. Over the years the staff experience with changes in the details of operating organizations has shown that organization charts can be modified in many ways while maintaining adequate operational safety. This experience has enabled the staff to distill those organizational characteristics which are important to safety. The aspects of the organizational charts which are important to safety and which are not covered by other specifications, and must therefore remain in TS were listed in GL 88-06.

The licensee has proposed deleting the onsite and offsite organization charts in accordance with the guidance in GL 88-06 along with the five miscellaneous administrative changes discussed above.

3.0 EVALUATION

In the application of July 11, 1989, the licensee proposed to revise Sections 6.2.1 and 6.2.2 to delete the two organizational charts shown in figures 6.2.1-1 and 6.2.2-1. The title for Section 6.2.1 would be changed from "Offsite Organizations" to "Offsite and Onsite Organizations." The title for Section 6.2.2 remains the same (i.e., "Unit Staff").

Section 6.2.1 is presently one sentence that states that the "unit management and technical support shall be as shown in Figure 6.2.1-1." Section 6.2.2 presently has one sentence that states that "the unit organization shall be as shown in Figure 2.2.2-1." Section 6.2.2 also has six subsections, a. through f., which specify requirements on minimum shift staffing, five brigade size, health physics coverage and overtime restrictions; in the application of July 11, 1989, the licensee was not proposing any changes in the wording of items a. through f., in Section 6.2.2.

In accordance with the guidance in GL 88-06, the licensee proposed to define, in words, the positions and associated responsibilities of the key personnel presently shown in the organizational charts who are important to plant safety. To accomplish this, the licensee proposed to add subsections a) through d) below to Section 6.2.1:

- a) The lines of authority, responsibility, and communication shall be established and defined from the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as

appropriate, in the form of organization charts, functional descriptions of department responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation.

- b) The Plant Manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c) The Vice President-Limerick Generating Station shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- d) The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

Deletion of the organizational charts is accompanied by the addition of general administrative control requirements which describe the essential aspects of the organizational structure defined in the organizational charts. The additional administrative control descriptions are contained in the proposed paragraph 6.2.1.a through 6.2.1.d. They involve the designation of safety responsibilities and organizational freedom of the Health Physics, Training and Quality Assurance groups. The independence of the Quality Assurance group is further guaranteed by adherence to 10 CFR 50 Appendix B, Criterion I. The proposed descriptions of duties and responsibilities meet the guidance in GL 88-06 and adequately defines the key corporate and plant management positions that are presently shown in Figure 6.2.1-1. The proposed additions to Section 6.2.1 are acceptable.

In the application of July 11, 1989, the only change the licensee was proposing in Section 6.2.2 was to revise the first line to delete reference to Figure 6.2.2-1. The wording of items a through f and the note which is presently at the bottom of page 6-1 were not proposed to be changed. The NRC staff suggested two changes to this Section which the licensee accepted and which were finalized in the November 3, 1989 supplement. The two suggested changes are discussed below.

Table 6.2.2-1 on "Minimum Shift Crew Composition" lists what positions on the operating staff must hold a Senior Reactor Operator (SRO) license. In addition, the present Figure 6.2.2-1 (which would be deleted by the amendment) has two notes which specify the management positions that must hold an SRO license (e.g., the Plant Manager or the Superintendent of Operations, etc.). The staff's position was that these notes should be added to Section 6.2.2. The licensee agreed and in the November 3, 1989 supplement proposed to add item g. The wording in item g is the same as what is required by the present TSs, so there is no change in the TS requirements. The present requirements are simply relocated from Figure 6.2.2-1 to the text.

Item f. in Section 6.2.2 lists the NRC proposed guidelines on controlling overtime and specifies who may approve deviations on a limited basis from these guidelines. With completion of construction of Limerick, Unit 2, there was a reorganization of the plant staff on July 15, 1989. One of the Superintendents presently listed in 6.2.2.f as authorized to approve overtime for construction personnel does not exist in the revised organization. An additional realignment of the plant staff has been announced for December 1989 and January 1990 following completion of the Limerick, Unit 2 power ascension test program and warranty run. The present TSs specify that the Plant Manager and certain Superintendents who are identified by specific titles may authorize deviations from the overtime guidelines. All TS requirements are implemented by plant procedures. The overtime requirements are implemented by procedure A-40, Rev. 3, "Working Hour Restrictions." This procedure not only specifies who can authorize overtime but also specifies the groups that are responsible for periodically reviewing individual overtime. The staff suggested to the licensee that while this Section of the TSs was being revised, that they consider revising the wording to list the Plant Manager or his designated alternates as specified in the administrative procedures. The licensee had the proposed revision approved by PORC and included the revised wording in the November 3, 1989 supplement. The revision still has the Plant Manager as the principal person responsible for approving deviations from the overtime guidelines. The Superintendents designated to act on his behalf are specified by title in the administrative procedure but not in the TSs. The revision does not change the intent or requirements of the present TSs and thus does not affect the staff's No Significant Hazards Consideration notice of the application.

The proposed change to remove the organizational charts from the TS and replace them with descriptions of the organizational structure and characteristics which are important to safety meets all the guidance in GL 88-06 and is acceptable.

As discussed previously, the licensee has also proposed five minor administrative changes in Section 6.0 of the TS. Each change is described and evaluated below.

Proposed Change #1 reflects a change to the organization under the Executive Vice President-Nuclear. The position of Senior Vice President-Nuclear Power has been abolished. The reflects a change in title and is acceptable.

Proposed Change #2 reflects the formation of the Nuclear Committee of the Board (NCB). The function of NCB is to advise and assist the Board of Directors in the proper and complete discharge of its responsibilities for oversight of the Company's nuclear operations. The Chairman of the Nuclear Review Board (NRB), which reports to and advises the Executive Vice President-Nuclear, will periodically meet

directly with the Chairman of the NCB, and will meet directly with the entire NCB at least once annually. The Office of the Chief Executive will be made aware of NRB activities by both the Executive Vice President-Nuclear and the Board of Directors. The Executive Vice President-Nuclear reports directly to the Office of the Chief Executive and, in accordance with TS 6.5.2.9, receives reports and advice from the NRB. The Board of Directors receives reports from the NRB through the NCB. We have therefore concluded that having the NCB and the Executive Vice President-Nuclear available to advise the Office of the Chief Executive will assure sufficient corporate management involvement in nuclear plant safety. The changes to reflect the roles of the two independent review Boards are acceptable.

Proposed Change #3 assigns a more appropriate level of corporate management as the recipients of NRB audit reports. The licensee proposes that the audit reports be forwarded to Corporate officers responsible for the areas audited rather than to the Executive Vice President-Nuclear. The Corporate Officers have a closer proximity to the sources of problems and therefore can take prompt corrective actions. This proposed change will not lessen the awareness of the Executive vice President-Nuclear. If NRB audit findings are not satisfactorily addressed by the Corporate Officers, the NRB may inform the Executive Vice President-Nuclear through its normal communication channel as defined in TS 6.5.2.1.

Proposed Change #4 reflects the deletion of the corporate ISEG. The deletion of the corporate ISEG requires that the two dedicated full time corporate ISEG engineers be transferred to the LGS ISEG group. This change is reflected in paragraph 6.2.3.2. Additionally, as a result of this change the position of ISEG manager is deleted and the LGS ISEG now reports to the General Manager - Nuclear Quality Assurance, as reflected in paragraphs 6.2.3.2 and 6.2.3.4. This change does not diminish the effectiveness of the ISEG as the ISEG Manager ultimately reports to the General Manager - Nuclear Quality Assurance and is acceptable.

Proposed Change #5 is proposed to delete unnecessary detail from the TS. Section 6.14.2 a 3 now specifies by title the group responsible for reviewing the ODCM - in addition to PORC. The change still requires that any revisions to the ODCM be reviewed by PORC and is acceptable.

4.0 ENVIRONMENTAL CONSIDERATION

This amendment relates to changes in recordkeeping, or administrative procedures or requirements.

Accordingly, the amendment meets 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 this amendment.

5.0 CONCLUSION

The Commission made a proposed determination that the amendment involves no significant hazards consideration which was published in the Federal Register (54 FR 35106) on August 23, 1989 and consulted with the Commonwealth of Pennsylvania. No public comments were received and the Commonwealth of Pennsylvania did not have any comments.

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 this amendment will not be inimical to the common defense and the security nor to the health and safety of the public.

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Dated: December 19, 1989