

FEB 9 1990

Docket Nos. 50-352 and 50-353
CAL No.: I-90-003

Philadelphia Electric Company
ATTN: Mr. C. A. McNeill, Jr.
Executive Vice President
Nuclear

Correspondence Control Desk
P.O. Box 7520
Philadelphia, PA 19101

Gentlemen:

Subject: CONFIRMATORY ACTION LETTER (CAL) I-90-003 UNSATISFACTORY LICENSED
OPERATOR REQUALIFICATION TRAINING PROGRAM

The purpose of this letter is to confirm our understanding of those actions which you have taken or will take to ensure that deficiencies/weaknesses in your licensed operator requalification program are promptly corrected, and that adequate proficiency of licensed operators is maintained at the Limerick Generating Station (LGS) Units 1 and 2. These problems were identified as a result of licensed operator requalification examinations administered by Region I during the week of January 29 through February 2, 1990, in which five of 14 individuals failed the examination. Based on these results, the NRC has determined that the Limerick Station Requalification Program is unsatisfactory.

The examination deficiencies/weaknesses were discussed during an exit meeting held with the NRC Requalification examination team on February 2, 1990, and with the Acting Regional Administrator during a management meeting on February 5, 1990. Your Basis for Continued Operation was presented at that management meeting and was subsequently documented in your letter of February 7, 1990. Your Basis for Continued Operation is acceptable pending administration and review of additional NRC Requalification Examinations. These additional examinations will be conducted during the weeks of February 12, 1990, and February 19, 1990.

Based upon the commitments contained in your February 7, 1990 letter, it is our understanding that you have or will:

1. Remove from licensed duties those individual licensed operators who failed or who fail an NRC administered Requalification Examination during the weeks of February 5, 12, and 19, 1990.
2. Not allow individuals, including members of the crew determined to be unsatisfactory, failing any portion of an NRC Requalification Examination to resume licensed duties before successfully passing an NRC administered Requalification Examination. This applies during the period that the NRC deems the Limerick Station Licensed Operator Requalification Program unsatisfactory.

3. Identify problems and root causes as to why the requalification program was unsatisfactory. This analysis will identify a corrective action program with a schedule of milestones. Submit the root cause analysis with proposed corrective actions to Region I in accordance with your letter of February 7, 1990.

The Limerick Station Licensed Operator Requalification Program shall be deemed to be unsatisfactory until further correspondence from NRC changes that status.

Issuance of the Confirmatory Action Letter does not preclude the issuance of an Order formalizing the above commitments. If your understanding differs from that set forth above, please call me immediately. The responses directed by the letter are not subject to the clearance procedures of the Office of Management and Budget, as required by the Paperwork Reduction Act of 1980, PL 86-511.

Thank you for your cooperation.

Sincerely,

*original signed by
WT Russell*

William T. Russell
Regional Administrator

cc:

R. J. Lees, Chairman, Nuclear Review Board
G. M. Leitch, Vice President - Limerick Generating Station
D. R. Helwig, Vice President - Nuclear Services
S. J. Kowalski, Vice President - Nuclear Engineering
J. W. Durham, Sr., Vice President and General Council
M. J. McCormick, Jr., Manager - Limerick Generating Station
G. A. Hunger, Jr., Director - Licensing Section
J. Doering, Project Manager - Limerick Generating Station
J. F. O'Rourke, Manager - Limerick Quality Division
T. B. Conner, Jr., Esquire
G. J. Madsen, Regulatory Engineer - Limerick Generating Station
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
Commonwealth of Pennsylvania

bcc:

Region I Docket Room (with concurrences)
J. Taylor, EDO

bcc (cont'd.):

- J. Lieberman, OE
- H. Thompson, DECS
- J. Partlow, NRR
- J. Goldberg, OGC
- J. Dyer, EDO
- K. Perkins, OLB, NRR
- D. Lange, OLB, NRR
- R. Cooley, OLB, NRR
- W. Kane, DRP
- R. Gallo, DRS, RI
- D. Holody, EO
- K. Smith, Regional Attorney, RI
- R. Conte, DRS, RI
- P. Eselgroth, DRS, RI
- D. Florek, DRS
- Secretary of Enforcement Officer, RI
- Management Assistant, DRMA
- Section Chief, DRP
- DRS Files (4)

*DRS:RI Florek/dmg/ajk <i>son</i> 2/16/90	*DRS:RI Conte <i>Conte</i> 2/9/90	*EO:RI Holody 2/ /90	*REG. ATTY:RI Smith <i>Smith</i> 2/9/90	*DRS:RI Gallo <i>Gallo</i> 2/9/90	*NRR:OLB Perkins <i>Perkins</i> 2/9/90	*DRP:RI Kane <i>Kane</i> 2/9/90
*DRS:RI Johnston <i>Johnston</i> 2/9/	*DRS:RI Hodges <i>Hodges</i> 2/9/90	*DRA:RI Martin <i>Martin</i> 2/9/90	RA:RI Russe <i>Russe</i> 2/9/90			

*SEE PREVIOUS CONCURRENCE

cc (cont'd.):
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
Commonwealth of Pennsylvania

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DRS Files (4)

DRS:RI Florek/dmg/ajk 2/6/90	DRS:RI Conte 2/7/90	EO:RI Holody 2/7/90	REG. ATTY:RI Smith 2/7/90	DRS:RI Gallo 2/7/90	DRP:RI Perkins 2/8/90	DRP:RI Kane 2/7/90
DRS:RI Johnston 2/8/90	DRS:RI Hodges 2/8/90	DRA:RI Martin 2/8/90	RA:RI Russell 2/ /90			

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