

PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

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February 26, 1990

Docket Nos. 50-277
50-278
License Nos. DPR-44
DPR-56

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

SUBJECT: Peach Bottom Atomic Power Station, Units 2 and 3
Technical Specifications Change Request

Dear Sir:

Philadelphia Electric Company hereby submits Technical Specifications Change Request No. 89-12, in accordance with 10 CFR 50.90, requesting an amendment to the Technical Specifications (Appendix A) of Operating License Nos. DPR-44 and DPR-56. Information supporting this Change Request is contained in Attachment 1 to this letter, and the proposed replacement page is contained in Attachment 2.

This submittal reflects changes to the Technical Specifications which commits the Peach Bottom Atomic Power Station to ANSI/ANS-3.1-1981, entitled, "Selection, Qualification and Training of Personnel for Nuclear Power Plants."

If you have any questions regarding this matter, please contact us.

Very truly yours,
G. A. Hunger, Jr.
G. A. Hunger, Jr.
Director
Licensing Section
Nuclear Services Department

Attachments

cc: J. J. Lyash, USNRC Senior Resident Inspector
W. T. Russell, Administrator, Region I, USNRC
T. M. Gerusky, Commonwealth of Pennsylvania

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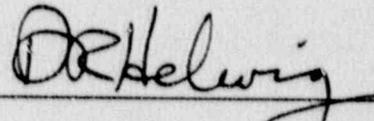
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COMMONWEALTH OF PENNSYLVANIA :
: SS.
CHESTER COUNTY :

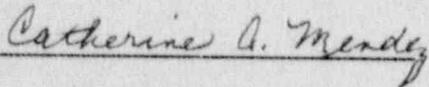
D. R. Helwig, being first duly sworn, deposes and says:

That he is Vice President of Philadelphia Electric Company, the Applicant herein; that he has read the attached request (No. 89-12) for changes to Peach Bottom Facility Operating Licenses DPR-44 and DPR-56, and knows the contents thereof; and that the statements and matters set forth therein are true and correct to the best of his knowledge, information and belief.



Vice President

Subscribed and sworn to
before me this 26th day
of February 1990.



Notary Public

NOTARIAL SEAL
CATHERINE A. MENDEZ, Notary Public
Tredyffrin Twp., Chester County
My Commission Expires Sept. 4, 1993

ATTACHMENT 1

PEACH BOTTOM ATOMIC POWER STATION
UNITS 2 AND 3

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TECHNICAL SPECIFICATIONS CHANGE REQUEST
NO. 89-12

"Commitment to ANSI/ANS-3.1-1981, entitled "Selection,
Qualification and Training of Personnel for Nuclear
Power Plants""

Supporting Information for Changes - 15 pages

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Philadelphia Electric Company (PECo), Licensee under Facility Operating Licenses DPR-44 and DPR-56 for the Peach Bottom Atomic Power Station (PBAPS) Unit Nos. 2 and 3, requests that the Technical Specifications contained in Appendix A of the Operating Licenses be amended.

Proposed changes to the Technical Specifications are indicated by vertical bar in the margin of page 246 contained in Attachment 2.

In accordance with the agreement (transmitted in a letter dated June 27, 1989 from W. Russell (NRC) to C. McNeill (PECo)) between PECO and the Commonwealth of Pennsylvania (the Commonwealth), PECO agreed to submit an application to the Nuclear Regulatory Commission (NRC) requesting an amendment to the Peach Bottom Atomic Power Station Units 2 and 3 Technical Specifications such that PECO would commit to standards set forth in ANSI/ANS-3.1-1981 entitled, "Selection, Qualification and Training of Personnel for Nuclear Power Plants" for PBAPS. Additionally, the agreement stated that the Technical Specifications amendment may specify, however, that to the extent that the standards set forth in ANSI/ANS-3.1-1981 apply to individual job positions at Peach Bottom, those standards shall not apply to PECO employees holding those positions as of

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February 27, 1989, so long as those individuals continue to hold those positions.

This application satisfies this commitment.

Description of Changes:

Licensee proposes the following changes to the Technical Specifications:

1. Section 6.3.1 (Facility Staff Qualifications") of the PBAPS Technical Specifications states that:

"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."

Licensee proposes to rewrite this paragraph to commit personnel reassigned, transferred or hired on or after February 28, 1989 to the ANSI/ANS-3.1-1981 standard. The paragraph shall state:

"6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions so long as those individuals hold those positions on and after February 27, 1989.

6.3.2 Each member of the facility staff who has been reassigned, transferred or hired on or after February 28, 1989, shall meet or exceed the minimum requirements of ANSI/ANS-3.1-1981, and qualification requirements for the INPO accredited training programs, for those comparable positions.

The Shift Technical Advisor shall also be required to have a bachelor's degree or equivalent in a scientific or engineering discipline, in addition to the requirements of ANSI/ANS-3.1-1981, and qualification requirements for the INPO accredited

training program, with specific training in plant design, and response and analysis of the plant for transients and accidents."

As noted in the above, Licensee proposes to add to Section 6.3.1 the words "so long as those individuals hold those positions on and after February 27, 1989." A new section 6.3.2 will be created that states: "Each member of the facility staff who has been reassigned, transferred or hired on or after February 28, 1989, shall meet or exceed the minimum requirements of ANS/ANSI-3.1-1981, and qualification requirements for the INPO accredited training programs, for those comparable positions."

Included in these words is reference to the qualification requirements for the INPO accredited training programs. These words are added to ensure that qualification requirements established by the INPO accredited training programs are maintained.

Additionally, Licensee proposes to delete from the existing paragraph the words "except for (1) Senior-Health Physicist (radiation protection manager) who shall meet or exceed the qualifications of Regulatory

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Guide 1.8, September 1975 and (2)". Reference to this regulatory guide is being deleted because the requirements of this guide are now included in the ANSI/ANS-3.1-1981 standard.

Licensee also proposes to delete the word "who" and add the words "also be required to" such that a new sentence will state: "The Shift Technical Advisor shall also be required to have a bachelor's degree or equivalent in a scientific or engineering discipline, in addition to the requirements of ANSI/ANS-3.1-1981, and qualification requirements for the INPO accredited training program, with specific training in plant design, and response and analysis of the plant for transients and accidents."

This change clarifies the requirements for the Shift Technical Advisor in that it clearly specifies that the Shift Technical Advisor shall also be required to have a bachelors' degree in addition to meeting the requirements of ANSI/ANS-3.1-1981.

Included in these words is reference to the qualification requirements for the INPO accredited training program. These words are added to ensure that qualification requirements established by the INPO accredited training program are maintained.

2. Licensee proposes to delete the reference to "Section 5.5 of ANSI N18.1-1971" in paragraph 6.4.1 ("Training") and replace it with reference to "Section 5 of ANSI/ANS-3.1-1981". Section 5.5 of ANSI N18.1-1971 concerns retraining and replacement training. Criteria for retraining and replacement training are now contained in Section 5 of ANSI/ANS-3.1-1981.

Additionally, reference to "Appendix A" of 10 CFR 55 has been deleted due to 10 CFR 55 being revised.

Also added are the words "INPO accredited training programs shall be an acceptable substitute for meeting the training requirements of ANSI/ANS-3.1-1981 for those comparable positions addressed in the accreditation programs. Training programs for comparable positions not covered by INPO accredited programs shall meet the requirements of ANSI/ANS-3.1-1981 by March 31, 1991 and until then, Section 5.5 of ANSI N18.1-1971." These words are added to clarify the relationship between INPO accredited training programs and the requirements of ANSI/ANS-3.1-1981.

Wording has also been added which permits that training programs for comparable positions not covered by INPO

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accredited programs shall meet the requirements of ANSI/ANS-3.1-1981 by March 31, 1991. This time delay is necessary to provide for the training program upgrades necessary to meet the requirements of ANSI/ANS-3.1-1981.

The paragraph shall state:

"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 of ANSI/ANS-3.1-1981 and 10 CFR 55. INPO accredited training programs shall be an acceptable substitute for meeting the training requirements of ANSI/ANS-3.1-1981 for those comparable positions addressed in the accreditation programs. Training programs for comparable positions not covered by INPO accredited programs shall meet the requirements of ANSI/ANS-3.1-1981 by March 31, 1991 and until then, Section 5.5 of ANSI N18.1-1971."

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Safety Assessment

The personnel of the operating organization who have the responsibility for the safe and efficient operation of a nuclear power plant throughout its operational lifetime must understand the complexities of the plant design and must be capable of properly manipulating the plant controls as well as maintaining and repairing the plant equipment. The selection of the operating and support personnel for nuclear power plants and the training of these personnel to provide sound judgment, based on knowledge and experience of nuclear and power plant systems, are essential to the safe and successful operation of these plants.

Subcommittee ANS-3, Reactor Operations, American Nuclear Society Standards Committee, developed a standard containing criteria for the qualification and training of nuclear power plant personnel. This standard was approved by the American National Standards Institute (ANSI) Committee N18, Design Criteria for Nuclear Power Plants, and designated ANSI N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel." It is to this standard that Peach Bottom has committed per Section 6.3.1 ("Facility Staff Qualifications") of the PBAPS Technical Specifications and Section 13.2 of the PBAPS UFSAR.

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Since approval of ANSI N18.1-1971, the ANSI standard has been revised and designated ANSI/ANS-3.1-1978, "Selection and Training of Nuclear Power Plant Personnel." As a result of lessons learned from the Three Mile Island Unit 2 incident as well as changing regulatory requirements, the 1978 version has been revised and reissued as ANSI/ANS-3.1-1981, "Selection, Qualification and Training of Personnel for Nuclear Power Plants."

Revision 2 of NRC's Regulatory Guide 1.8 endorses Sections 4.3.1.1, "Shift Supervisor," 4.3.1.2, "Senior Operator," 4.5.1.2, "Licensed Operators," 4.4.8, "Shift Technical Advisor," and 4.4.4, "Radiation Protection" of ANSI/ANS-3.1-1981, with exceptions. NRC's endorsement for all other positions remains with ANSI N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel." As noted in the NRC's publication, NUREG-1262 (which was transmitted by Generic Letter 87-16, dated November 12, 1987), if the training programs are INPO accredited, there is no obligation to follow Regulatory Guide 1.8, Revision 2 because the INPO guidelines are equivalent to the staff guidelines in the Regulatory Guide. At Peach Bottom, 11 training programs are INPO accredited. Wording has been included in the Technical Specification change which ensures that all qualification and training requirements for the INPO accreditation programs are

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included as a part of the facility staff qualifications and the PBAPS training program.

As noted in the "Description of Changes", wording has also been added which permits that training programs for comparable positions not covered by INPO accredited programs shall meet the requirements of ANSI/ANS-3.1-1981 by March 31, 1991. This time delay is necessary to provide for the training program upgrades necessary to meet the requirements of ANSI/ANS-3.1-1981.

A comparison has been performed between the requirements of ANSI/ANS-3.1-1981 and ANSI N18.1-1971. The personnel selection, qualification and training requirements provided in ANSI/ANS-3.1-1981 are generally equivalent or greater than the 1971 version. The 1981 version also encompasses additional positions not discussed in the 1971 version. Therefore, compliance with ANSI/ANS-3.1-1981 will improve the selection, qualification and training of the operating and support personnel for the nuclear power plant station and will not adversely affect the safe operation of the plant.

Information Supporting a Finding of
No Significant Hazards Consideration

The Commission has provided guidance concerning the application of the standards for determining whether license amendments involve significant hazards considerations by providing certain examples (51 FR 7751). One of the examples of amendments that are considered not likely to involve significant hazards consideration is "(ii) A change that constitutes an additional limitation, restriction, or control not presently included in the technical specifications, e.g., a more stringent surveillance requirement." The proposed changes to the Technical Specification impose additional controls not presently included in the Technical Specifications.

The proposed changes to the Peach Bottom operating licenses do not constitute a significant hazards consideration in that they do not:

- i) Involve a significant increase in the probability or consequences of an accident previously evaluated.

The upgrade in personnel selection, qualification and training standards to ANSI/ANS-3.1-1981 will ensure equivalent or higher levels of education, experience and

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training of plant personnel. These equivalent or higher standards in personnel selection, qualification and training will serve to reduce the probability of an accident as previously evaluated from occurring, and reduce the consequences of an accident as previously evaluated.

Wording has been included in the Technical Specifications change which ensures that all qualification and training requirements for the INPO accreditation programs are included as a part of the facility staff qualifications and the PBAPS training program. At Peach Bottom, 11 training programs are INPO accredited. This is an administrative change to the Technical Specifications which will not involve a significant increase in the probability or consequences of an accident as previously evaluated.

- ii) Create the possibility of a new or different kind of accident from any accident previously evaluated.

The change of the Technical Specifications from the current requirements of ANSI N18.1-1971 to ANSI/ANS-3.1-1981 and the INPO accreditation requirements are administrative changes which will increase the level of

standards for selection, training and qualifications of plant personnel and will not create a new or different kind of accident than previously evaluated.

iii) Involve a significant reduction in a margin of safety.

The change of the Technical Specifications from the current requirements of ANSI N18.1-1971 to ANSI/ANS-3.1-1981 and the INPO accreditation requirements are administrative changes which will result in an increase in personnel selection, qualification and training standards and serve to increase margins of safety as defined in the PBAPS Technical Specifications.

Information Supporting an Environmental Impact Assessment

An environmental impact assessment is not required for the changes proposed by this Application because the changes conform to the criteria for "actions eligible for categorical exclusion" as specified in 10 CFR 51.22(c)(9). The Application involves no significant hazards consideration as demonstrated in the preceding section. The Application involves no significant change in the types or significant increase in the amounts of any effluents that may be released offsite, and there is no

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significant increase in individual or cumulative occupational radiation exposure.

Conclusion

The Plant Operations Review Committee and the Nuclear Review Board have reviewed these proposed changes to the Technical Specifications and have concluded that they do not involve unreviewed safety questions or involve Significant Hazards Considerations, and will not endanger the health and safety of the public.

ATTACHMENT 2

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TECHNICAL SPECIFICATION CHANGES

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