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Dockets Nos. 50-277
and 50-278

Mr. Edward G. Bauer, Jr.
Vice President and General Counsel
Philadelphia Electric Company
2301 Market Street
Philadelphia, Pennsylvania 19101



Dear Mr. Bauer:

SUBJECT: UPGRADED SRO AND RO TRAINING AND TRAINING FOR MITIGATING
CORE DAMAGE - REQUEST FOR ADDITIONAL INFORMATION

In our review of NUREG-0737 Item Nos. I.A.2.1 and II.B.4 for the Peach Bottom Station Units 2 and 3, we have identified additional information which we will need in order to complete our review. Science Applications, Inc. under contract to the NRC has developed the attached request for additional information. We requested that you respond within 30 days of receipt of this letter. Please send a copy of your submittal directly to Dr. R. T. Liner, Science Applications, Inc., 1710 Goodridge Drive, McLean, Virginia 22102. This request for information is in accordance with the OMB Clearance No. 3150-0065, which expires May 31, 1982.

Sincerely,

"ORIGINAL SIGNED BY
JOHN F. STOLZ"

John F. Stolz, Chief
Operating Reactors Branch #4
Division of Licensing

Enclosure:
Request for Additional
Information

cc w/enclosure:
See next page

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SURNAME	MFairtile;cf	DWigginton	JStolz				
DATE	5/12/82	5/12/82	5/12/82				

Philadelphia Electric Company

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LICENSING ACTION REQUEST FOR ADDITIONAL INFORMATION

The U.S. Nuclear Regulatory Commission and its technical assistance contractor, Science Applications, Inc. (SAI), are performing a review to ascertain the acceptability of your response to certain requirements contained in post-TMI Action Items set forth in NUREG-0660 and NUREG-0737:

I.A.2.a Immediate Upgrading of Reactor Operator and Senior Reactor Operator Training and Qualifications

II.B.4 Training for Mitigating Core Damage

Specifically, this review addresses the following items from Enclosure 1 of Harold Denton's letter of March 28, 1980, contained in NUREG-0737. Item A.2.c. which addresses operator training requirements, item A.2.e which addresses instructor requalification, and Section C which addresses operator requalification. Some of these items are further elaborated in Enclosures 2, 3, and 4 of the Denton letter and in post-TMI Action Item II.B.4 (also in NUREG-0737).

Our review is presently based on your submittal of December 22, 1980, which includes the following:

1. Letter dated December 22, 1980, Shields L. Daltroff (plant) to Darrell G. Eisenhut (NRC) with Attachment A, B, and C.
2. Letter dated April 30, 1981, S. L. Daltroff (plant) to P. F. Collins (NRC).
3. Philadelphia Electric Company Peach Bottom Atomic Power Station Delta, Pennsylvania Licensed NRC Operator Requalification Program (5 pages, no date).

We assume these submittals reflect your current training program. We need answers to the following questions before we can complete our evaluation:

1. The training and requalification program for senior reactor operator/reactor operator have lectures which appear to cover the subject of heat transfer, fluid flow and thermodynamics as called out in enclosure 1 of Denton's March 28, 1980, letter. Do these lectures in fact cover this material and is the coverage to the level of detail spelled out in enclosure 2 of the Denton letter? Please send course outlines if available.

2. The reactor operator and senior reactor operator training and requalification programs have lectures which appear to address the subject of using installed plant systems to control or mitigate an accident in which the core is severely damaged. Do these lectures address the topic and do they cover the subject to the level of detail spelled out in enclosure 3 of Denton's letter? Please send course outlines if available.
3. Are the lectures and quizzes on the subject of accident mitigation given to shift technical advisors and operating personnel from the plant manager through the operations chain to the licensed operators? If they are, would you please provide the titles of the people who are trained and an organization chart which illustrates their position in the operations chain? (This question applies to both training and requalification programs.)
4. Do the training and requalification program elements which involve heat transfer, fluid flow, thermodynamics and accident mitigation involve 80 contact hours in each program? (A contact hour of instruction is a one-hour period in which the course instructor is present or available for instructing or assisting students; lectures, seminars, discussions, problem-solving sessions, and examinations are considered contact periods under this definition.)
5. Is there an increased emphasis on reactor and plant transients in the reactor operator and senior reactor operator training program as required by item A.2.C.3 of enclosure 1 of Denton's March 28, 1980, letter? If there is, does this training deal with both normal transients and abnormal (accident) transients?
6. Are your instructors enrolled in appropriate requalification programs to assure they are cognizant of current operating history, problems, and changes to procedures and administrative limitations?
7. The reactor operator requalification program identifies twenty-six reactor control manipulations which are nearly the same as those identified in enclosure 4 of the Denton letter. Will this list be expanded to address item (19) as called out in enclosure 4 of Denton's letter? If not, please provide a rationale for the exception.