



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
SUPPORTING AMENDMENT NOS. 47 AND 10 TO FACILITY OPERATING  
LICENSE NOS. NPF-39 AND NPF-85  
PHILADELPHIA ELECTRIC COMPANY  
LIMERICK GENERATING STATION, UNITS 1 AND 2  
DOCKET NOS. 50-352 AND 50-353

1.0 INTRODUCTION

By letter dated July 13, 1990, Philadelphia Electric Company (the licensee) requested an amendment to Facility Operating License Nos. NPF-39 and NPF-85 for the Limerick Generating Station, Units 1 and 2. These proposed amendments would change the Administrative Controls section (Section 6.0) of the Technical Specifications (TS), including the addition of a new TS Section 6.5.3, to reflect the implementation of a Station Qualified Reviewer (SQR) Program for review and approval of new station programs, procedures, and changes thereto. The SQR Program is a program/procedural review and approval process using qualified reviewers to perform a review and designated Superintendents for approval of new programs, procedures, and changes thereto. This program has been approved by the NRC for a number of facilities, including the Public Service Electric and Gas (PSE&G) Company facilities.

2.0 The Proposed Amendment

There are two key areas of importance under the SQR program:

- The Plant Operations Review Committee (PORC) will no longer be required to render a determination as to whether or not a new program, procedure, or change thereto constitutes an unreviewed safety question (USQ) in accordance with 10 CFR 50.59.
- PORC will no longer be required to review and recommend approval/disapproval of new programs or program changes and certain types of procedures or procedure changes to the Plant Manager.

The SQR Program will function as follows:

- o The PORC Chairman approves plant personnel recommended to be Station Qualified Reviewers (SQRs) for specific types of programs and classes of procedures. The SQR will be an individual knowledgeable in the functional area affected and may be from the same organization, but who is not the individual preparer.

- ° The Plant Manager, as authorized by Administrative Procedures, appoints plant Superintendents to be responsible for approving specific types of programs and classes of procedures. The appointed Superintendent will be the individual responsible for and cognizant of the affected functional area.
- ° Each new program, procedure, or change thereto is reviewed by the designated SQR. The SQR determines when a cross-disciplinary review by other personnel is necessary prior to approval. The new program, procedure, or change thereto and accompanying 10 CFR 50.59 Review documentation (i.e., evaluation of the proposed change, new procedure or new program in accordance with 10 CFR 50.59) is reviewed by the responsible Superintendent, including a determination as to whether a 10 CFR 50.59 safety evaluation is required or not. If not, the new program, procedure, or change thereto is then approved by the responsible Superintendent or the Plant Manager. If a 10 CFR 50.59 safety evaluation is required, the entire new program, procedure, or change package, including the 10 CFR 50.59 safety evaluation, is reviewed by PORC.
- ° PORC continues to be responsible for the review and recommendation for approval/disapproval of Administrative Procedures, and any new program, procedure, or change thereto that requires an unreviewed safety question determination (i.e., 10 CFR 50.59 safety evaluation) be performed.
- ° The Plant Manager continues to be responsible for the approval of Administrative Procedures, Security Plan Implementing Procedures, Emergency Plan Implementing Procedures, and any new program, procedure, or change thereto that requires an unreviewed safety question determination (i.e., 10 CFR 50.59 safety evaluation) be performed.
- ° Temporary procedure changes (TPCs) will be implemented as before, however, the TPC will be reviewed by the designated SQR (including a cross-disciplinary review, if necessary) and approved by the Plant Manager or responsible Superintendent, as appropriate, within 14 days of implementation.

### 3.0 Evaluation

Section 13.5.1 (Administrative Procedures) of the Standard Review Plan (SRP) requires that the staff determine that "the applicant has described the program and procedures that provide administrative controls over activities important to safety. These include the activities of the preparation, review, and approval of plant operating and maintenance procedures, . . . .". For Limerick, PECO had proposed in the FSAR that procedures be reviewed by the Plant Operations Review Committee (PORC). In Section 13.5.1 (page 13-18) of the staff's SER on Limerick (NUREG-0991), the staff noted:

"The plant procedures are normally prepared by the station operating staff. However, organizations providing technical support and consultants may assist in procedure development. The procedures and their revisions are reviewed by the PORC, or by a subcommittee appointed by PORC, and by the Superintendent, Quality Assurance Division; they are approved by the



Station Superintendent or Assistant Station Superintendent before they are used."

There have been some changes in titles of plant management but changes to programs and procedures are still reviewed by PORC. At the NTOL phase, when many new procedures were being developed, the applicant's proposal to have procedures reviewed by PORC was an acceptable means of providing administrative controls over activities important to safety (SRP 13.5.1). The major workload now is not development of new procedures but the self-imposed requirement to periodically review all procedures (procedures are reviewed on a two year and/or five year cycle) and improvements to procedures indicated by plant experience. The present requirement to have PORC review all procedures and programs has worked satisfactorily. There have been no significant regulatory concerns identified with PORC's review of programs and procedures. Since the present system is working - from a regulatory standpoint - the staff assessed the disadvantages of the present arrangement as part of our assessment of whether the proposed new program (the SQR) would provide an acceptable level of control over programs and procedures.

As prescribed in Section 6.5.1 of the TSs, the Plant Operations Review Committee (PORC) functions to advise the Plant Manager on all matters related to nuclear safety. The composition of the PORC is specified in Section 6.5.1.2 of the TSs and includes the four Superintendents, the Assistant Superintendent-Operations, the Regulatory Engineer, the Technical Engineer, a Shift Superintendent and the Maintenance Engineer (9 members). This is essentially the entire senior management at the plant. While there are provisions for a PORC member being on vacation or in training, the TSs specify that "no more than two alternates shall participate as voting members in PORC activities at any one time".

Under the proposed program, the PORC Chairman will approve plant personnel recommended to be SQRs for specific types of programs and procedures. The Plant Manager, as authorized by Administrative Procedures, will appoint Plant Superintendents to be responsible for approving specific types of programs and classes of procedures. The appointed Superintendent will be the individual responsible for and cognizant of the affected functional area.

The program will be controlled by Administrative Procedures which will continue to be reviewed by PORC and approved by the Plant Manager. PORC will continue to review those new programs, procedures, and changes thereto for which an unreviewed safety question determination (i.e., 10 CFR 50.59 safety evaluation) is required to be performed. As a result, the proposed administrative changes will not decrease the safety oversight function which PORC performs.

A number of nuclear facilities have a SQR program similar to that proposed by the licensee, including Salem and Hope Creek. An Integrated Performance Assessment Team, (IPAT) Inspection was conducted by NRC at Salem during May 14 - 25, 1990. The team found that some procedure changes were conducted without the required 50.59 safety evaluations. Because of incomplete screening criteria, inadequate training and a misunderstanding on the part of SQRs and station management, issues that should have been reviewed by the Station Operations Review Committee were not.

There are some significant differences between the program that existed at Salem at the time of the IPAT inspection and the SQR program proposed by PECO. These additional controls should preclude the problems found by the NRC inspection team at Salem. On July 6, 1989, PECO issued a new administrative procedure - NA-02R002 - applicable to the entire nuclear group (i.e., corporate, licensing, Limerick and Peach Bottom). The procedure implemented NSAC/125, "Guidelines for 10 CFR 50.59 Safety Evaluations". The procedure provides instructions to the entire PECO nuclear group on the preparation of 10 CFR 50.59 safety evaluations. All personnel who might be involved in these types of reviews were given training on the procedure. PECO declared the procedure fully implemented on December 1, 1989.

NA-02R002 requires that the assessment of whether a 50.59 safety evaluation is required must be documented. Additionally, PECO is proposing that the SQR only apply to procedures and programs but not to modifications, tests and experiments. The proposed program at Limerick assures an independent review process. The Limerick plant management has a strong safety perspective, as reflected in the SALP reports.

There are some other differences between the TSs proposed by PECO for Limerick and the TSs approved by the Commission authorizing the SQR program at Salem and Hope Creek. In approving the SQR program for other licensees, the staff has required that SQRs meet certain qualifications. For example, Section 6.5.3.2c of the Hope Creek TSs states that: "The Station Qualified Reviewers shall meet or exceed the qualifications described in Section 4.4 of ANS 3.1, 1981." Section 6.5.3.2c of the Salem TSs states that "A system of Station Qualified Reviewers, each of whom shall possess qualifications that meet or exceed the requirements of Section 4.4 of ANSI N 18.1-1971, shall be maintained by the SORC Chairman." The new Section 6.5.3 proposed by PECO does not contain a similar requirement because the present Limerick TSs in Section 6.3.1 on Unit Staff Qualifications requires that "Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 for comparable positions." The personnel who will be approved as SQRs at Limerick will be members of the unit staff and thus will be required to meet the ANSI/ANS 3.1 qualifications. However, the staff concluded that the qualifications should reference Section 4.4 of the Standard, which applies to technical and professional personnel. The licensee agreed to adding a sentence to Section 6.5.3.4 (page 6-12a) of the TSs similar to that in the Hope Creek TSs. The added sentence reads: "The SQRs shall meet or exceed the qualifications described in Section 4.4. of ANSI/ANS 3.1 - 1978." With this addition, the staff concludes that the proposed TSs adequately address the qualification of the SQRs.

Another difference between the TSs approved by the Commission for Hope Creek and Salem vs the TSs proposed by PECO is in Section 6.5.1.6e. In the present Limerick TSs, this Section requires that PORC shall be responsible for "review of the safety evaluations for procedures and changes thereto completed under the provisions of 10 CFR 50.59". PECO is proposing to delete Section 6.5.1.6e and incorporate the same requirement in a more explicit revised Section 6.5.1.6a. The latter specifically requires PORC to review the entire package - the pro-



cedure as well as the 10 CFR 50.59 safety evaluation. In the Hope Creek and Salem TSs, Section 6.5.1.6e was retained because it requires the SORC to review all 50.59 safety evaluations (i.e., for modifications and tests and experiments as well as procedures and programs). As discussed above, the revised Section 6.5.1.6a will require PORC to review all programs or procedures or changes thereto for which the applicable Superintendent has determined that a 10 CFR 50.59 safety evaluation is needed. PORC is not, however, the approving authority. Section 6.5.1.7a (which is not being changed) requires that PORC "recommend in writing to the Plant Manager approval or disapproval" of the proposed programs or procedures. The Plant Manager is the approval authority.

Based on our evaluation, we conclude that the proposed SQR program at Limerick will provide adequate control over activities important to safety, including the preparation, revision, review and approval of programs and procedures and changes thereto. The proposed changes to the TS are acceptable.

#### 4.0 ENVIRONMENTAL CONSIDERATION

These amendments relate to changes in recordkeeping, reporting or administrative procedures or requirements. Accordingly, these amendments meet 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 these amendments.

#### 5.0 CONCLUSION

The Commission made a proposed determination that these amendments involve no significant hazards consideration which was published in the Federal Register (55 FR 34380) on August 22, 1990 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, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of these amendments will not be inimical to the common defense and the security nor to the health and safety of the public.

Dated: October 4, 1990

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