

JCS

MAR 1 1994

Docket Nos. 50-352
50-353

Mr. D. M. Smith
Senior Vice President - Nuclear
PECO Energy
Nuclear Group Headquarters
Correspondence Control Desk
P. O. Box 195
Wayne, PA 19087-0195

Dear Mr. Smith:

SUBJECT: PECO ENERGY/NRC MEETING ON FEBRUARY 10, 1994, TO DISCUSS
LIMERICK REQUALIFICATION EXAMINATION RESULTS

On February 10, 1994, representatives from PECO Energy and the Nuclear Regulatory Commission (NRC) met in the Region 1 office to discuss the Limerick Generating Station 1993 licensed operator requalification examination results. Attendees at the meeting are listed in Attachment 1. The handouts provided in the meeting are contained in Attachment 2.

The meeting was beneficial in understanding your staff's assessment, root cause determination, and corrective actions to further enhance the Limerick requalification program. Your staff provided a summary of the 1993 Limerick requalification examination results, and an assessment, including root causes and corrective actions, of the combined inspection report 50-352/93-27 and 50-353/93-27 findings related to operator and evaluator performance during the job performance measure portion of the requalification examination. Your staff agreed to formally transmit a summary of the results of the assessment, root causes, and corrective actions as a response to the inspection report.

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*Change Region 1.
Original
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PDR ADOCK 05000352
V PDR

Mr. D. M. Smith

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We request you forward your response letter to the inspection report 30 days after you receive this letter. If you have any questions regarding this item, please contact me at (610) 337-5210.

Sincerely,

Original Signed by:

RICHARD J. CONTE

Richard J. Conte, Chief
BWR Section, Operations Branch
Division of Reactor Safety

Attachment:

As stated

cc w/attchmt:

J. Doering, Chairman, Nuclear Review Board
D. R. Helwig, Vice President - Limerick Generating Station
G. A. Hunger, Jr., Manager - Licensing Section
J. L. Kantner, Regulatory Engineer - Limerick Generating Station
Secretary, Nuclear Committee of the Board
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
K. Abraham, PAO (2)
NRC Resident Inspector
Commonwealth of Pennsylvania

bcc w/attchmt:

Region I Docket Room (with concurrences)
R. Conte, DRS
D. Florek, DRS
M. Shannon, ILPB
DRS Files (2)

Mr. D. M. Smith

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bcc w/o attchmt: (Via E-Mail)

V. McCree, OEDO

F. Rinaldi, NRR

C. Miller, PDI-2, NRR

RI:DRS
Florek/dmg

02/24/94

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ATTACHMENT 1

ATTENDANCE AT FEBRUARY 10, 1994, MEETING

LIMERICK LICENSED OPERATOR REQUALIFICATION

PECO Energy Company

K. Borton, Licensing Engineer, Corporate
R. Boyce, Plant Manager, Limerick
V. Cwietniewicz, Director of Training, Limerick
J. Doering, Chairman, NRB
T. Dougherty, Manager of Operations Training, Limerick
D. Helwig, Vice President, Limerick
L. Hopkins, Manager of Operations, Limerick
J. Kantner, Manager Limerick Gen Stat

U. S. Nuclear Regulatory Commission

C. Anderson, Chief Section 2B
J. Caruso, Operations Engineer
R. Conte, Chief, BWR Section
T. Easlick, Resident Inspector, Limerick
D. Florek, Sr. Operations Engineer
M. Mayfield, Deputy Director Division of Reactor Safety
C. Sisco, Operations Engineer

Other

G. Donnelly, Reporter-Times Herald
S. Maingi, Nuclear Engineer, PA BRP

ATTACHMENT 2

PECO ENERGY HANDOUTS

LIMERICK GENERATING STATION
REVIEW OF 1993 LOR EXAM WEAKNESS



PECO
ENERGY

February 10, 1994

AGENDA

I. INTRODUCTION

DAVE HELWIG
VICE PRESIDENT, LGS

II. 1993 EXAM PERFORMANCE SUMMARY

LARRY HOPKINS
SR. MANAGER, OPS

III. JPM PROGRAM REVIEW

JAY DOERING
CHAIRMAN, NRB

IV. ROOT CAUSES

JAY DOERING
CHAIRMAN, NRB

V. CORRECTIVE ACTIONS

BOB BOYCE
PLANT MANAGER, LGS

VI. SUMMARY

DAVE HELWIG
VICE PRESIDENT, LGS

1993 EXAM SUMMARY

	RO (PASS/FAIL)	SRO (PASS/FAIL)	TOTAL (PASS/FAIL)
WRITTEN	23/0	33/1	56/1
SIMULATOR	22/2 *	32/2	54/4
JPMs	23/0	34/0	57/0

* One RO Took the Simulator Exam only (Licensed in */93).

- o SEVEN (7) INDIVIDUALS FAILED ONE JPM
- o THE WRITTEN EXAM AVERAGE WAS 94.9 %
- o THERE WAS ONE (1) SIMULATOR "CREW FAILURE"

JPM REVIEW PROCESS

o MEMBERSHIP

- EIGHT MEMBER TEAM
- HEADED BY NRB CHAIRMAN;
FORMER PLANT MANAGER, LGS
- FOUR RECOMMENDED STATIONS,
THREE UTILITIES REPRESENTED
- INDIVIDUAL MEMBERS ALL CURRENTLY
OR FORMERLY LICENSED/CERTIFIED
- MEMBERS EXPERIENCE INCLUDES TRAINING,
OPERATIONS, AND OVERSIGHT/ASSESSMENT

JPM REVIEW PROCESS

o PROCESS

- FOUR DAYS IN RESIDENCE AT LGS
- FOUR PHASE ANALYSIS PROCESS:
 - + JPM FAMILIARIZATION PHASE
 - + JPM OBSERVATION AND ANALYSIS PHASE
 - + FOCUS GROUP QUESTION & ANALYSIS PHASE
 - + ROOT CAUSE DETERMINATION PHASE

JPM REVIEW PROCESS

o PROBLEM STATEMENT

- OPERATORS DID NOT FULLY COMPLY WITH STATION PROCEDURES DURING JPMs AND WERE PASSED BY EVALUATORS

o ROOT CAUSE DETERMINATION:

- FAULT TREE ANALYSIS
(PECO ROOT CAUSE AND MORT FRAMEWORK)
- ANTECEDENT/BEHAVIOR/CONSEQUENCE ANALYSIS
- DIFFERENCE ANALYSIS;
BETWEEN UTILITIES - BETWEEN STATIONS

ROOT CAUSES

- o PROCEDURE HUMAN FACTORING AND THE PROCEDURE CHANGE PROCESS.
- o JPM DEVELOPMENT AND USAGE.
- o LACK OF OVERSIGHT OF THE JPM PROCESS.
- o ADDED STRESS DUE TO MONETARY BONUS.

CORRECTIVE ACTIONS

- o **ROOT CAUSE:**

- PROCEDURES

- o **CORRECTIVE ACTIONS**

- IMPLEMENT INDUSTRY "BEST" PROCEDURE WRITING GUIDANCE

- PROCEDURES PARTNERSHIP PROCESS

CORRECTIVE ACTIONS

- o **ROOT CAUSE:**

- JPM DEVELOPMENT AND USAGE

- o **CORRECTIVE ACTIONS**

- DEVELOP JPM WRITER & EXAMINER GUIDELINES
- IMBED MANAGEMENT EXPECTATIONS IN JPMs
- PERFORM JPM "CRITICAL TASK" REVIEW
- TRAIN ON JPM PERFORMANCE EXPECTATIONS
- ONGOING JPM TRAINING THROUGHOUT THE YEAR

CORRECTIVE ACTIONS

- o **ROOT CAUSE:**

- LACK OF OVERSIGHT

- o **CORRECTIVE ACTIONS**

- ESTABLISH MONITORING PROGRAM FOR JPMs
- INCORPORATE PROGRAM INTO STRATEGIC TRAINING AGREEMENT
- ASSESS JPM PERFORMANCE AFTER EACH CYCLE

CORRECTIVE ACTIONS

- o **ROOT CAUSE:**

- ADDED PRESSURE DUE TO BONUS

- o **CORRECTIVE ACTION**

- MODIFY LICENSE BONUS PROGRAM