

AUG 9 1982

DISTRIBUTION:

Docket File
LB#2 File
HAbelson
EHylton
Region I
I&E
ACRS (16)
Lewis, OELD
EPederson
LCrocker
JZwolinski

bcc: NRC PDR
Local PDR
NSIC
PRC

Docket No. 50-352/353

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

Dear Mr. Bauer:

Subject: Meeting with Licensee Qualifications Branch

We would like to schedule an early information meeting between members of your staff and the Licensee Qualifications Branch (LQB) here at Bethesda, Maryland, during the week of September 7, 1982, to discuss your present and future corporate and plant management structure, staffing, and training plans for the Limerick plant. We also would like to discuss the Independent Safety Engineering Group (SEG), the provisions made for the use of Shift Technical Advisors (STAs), and the arrangements for safety reviews of the plant operations, including onsite and corporate reviews and audits. We expect the meeting to last no more than 2 - 3 hours. The agenda items contained in Enclosure 1 will help you prepare for this activity.

The meeting should give our staff (LQB) the opportunity to point out potential problems areas, especially in staffing and training, and prepare for our normal site visit (audit review), now tentatively scheduled for October, 1982.

Any questions concerning this meeting should be directed to Dr. Harvey Abelson (301) 492-9774, the Licensing Project Manager.

Sincerely,

A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing

Enclosure:
As stated

cc: See next page

8208260135 820809
PDR ADOCK 05000352
A PDR

OFFICE ▶	DL: LB#2/PB	DL: LB#2/BC				
SURNAME ▶	HAbelson:bm	ASchwencer				
DATE ▶	8/9/82	8/9/82				

Limerick

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

cc: Troy B. Conner, Jr., Esquire
Conner and Wetterhahn
1747 Pennsylvania Avenue, N. W.
Washington, D. C. 20006

Mr. Robert W. Adler
Assistant Counsel
Commonwealth of Pennsylvania, DER
505 Executive House
P. O. Box 2357
Harrisburg, Pennsylvania 17120

Honorable Lawrence Coughlin
House of Representatives
Congress of the United States
Washington, D. C. 20515

Roger B. Reynolds, Jr., Esquire
324 Swede Street
Norristown, Pennsylvania 19401

Lawrence Sager, Esquire
Sager & Sager Associates
45 High Street
Pottstown, Pennsylvania 19464

Joseph A. Smyth
Assistant County Solicitor
County of Montgomery
Courthouse
Norristown, Pennsylvania 19404

Eugene J. Bradley
Philadelphia Electric Company
Associate General Counsel
2301 Market Street
Philadelphia, Pennsylvania 19101

Mr. Vincent Boyer
Senior Vice President
Nuclear Operations
Philadelphia Electric Company
2301 Market Street
Philadelphia, Pennsylvania 19101

Mr. Marvin I. Lewis
6504 Bradford Terrace
Philadelphia, PA 19149

Frank R. Romano, Chairman
Air & Water Pollution Patrol
61 Forest Avenue
Ambler, PA 19002

Charles W. Elliott, Esquire
Thomas & Hair
123 North Fifth Street
Allentown, PA 18102

Judith A. Dorsey, Esquire
Limerick Ecology Action
1315 Walnut Street, Suite 1632
Philadelphia, PA 19107

Mr. Karl Abraham
Public Affairs Officer
Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19806

Mr. Jacque Durr
Resident Inspector
U.S. Nuclear Regulatory Commission
P. O. Box 47
Sanatoga, PA 19464

James M. Neill, Esquire
Associate Counsel for Del-Aware
Box 511
Dublin, PA 18917

Joseph H. White III
11 South Merion Avenue
Byrn Mawr, PA 16801

Thomas Gerusky, Director
Bureau of Radiation Protection
Dept. of Environmental Resources
5th Floor, Fulton Bank Bldg.
Third & Locust Streets
Harrisburg, PA 17120

Director, Pennsylvania Emergency
Management Agency
Basement, Transportation &
Safety Building
Harrisburg, PA 17120

John Shniper
Meeting House Law Bldg. & Gallery
Mennonite Church Road
Schuylkill Road (Rt. 724)
Spring City, PA 19475

Robert L. Anthony
Friends of the Earth of the
Delaware Valley
103 Vernon Lane, Box 186
Moylan, PA 19065

W. Wilson Goode
Managing Director
City of Philadelphia
Philadelphia, PA 19107

William A. Lochstet
119 E. Aaron Drive
State College, PA 16801

Walter W. Cohen
Consumer Advocate
Office of Attorney General
1425 Strawberry Square
Harrisburg, PA 17120

Steven P. Hershey, Esquire
Consumers' Education & Protective
Association
Sylvania House
Juniper & Locust Streets
Philadelphia, PA 19107

Alan J. Noguee
The Keystone Alliance
3700 Chestnut Street
Philadelphia, PA 19104

Sugarman & Denworth
Suite 510
North American Building
121 South Broad Street
Philadelphia, PA 19107

Donald S. Bronstein, Esq.
The National Lawyers Guild
Third Floor
1425 Walnut Street
Philadelphia, PA 19102

Lawrence Brenner, Esq., Chairman*
Administrative Judge
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Richard F. Cole*
Administrative Judge
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Peter A. Morris*
Administrative Judge
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

ENCLOSURE 1

AGENDA ITEMS

The following items should be discussed:

1. Describe the current overall nuclear organization both onsite and offsite.
2. Discuss how the basic objectives of NUREG-0731 "Guidelines for Utility Management Structure and Technical Resources" are met with respect to the offsite organization and resources, including the radiological protection organization.
3. Describe the responsibilities of each offsite organizational element that is related to the management or support of nuclear plant operation.
4. Explain the lines of authority and communication between these offsite organizational elements.
5. Explain the lines of authority and communication between these offsite organizational elements and the organizational elements at the site.
6. Describe the qualification and staffing levels of the offsite managers and technical staff (provide these in writing prior to meeting if possible).
7. Discuss the Independent Safety Engineering Group that is located onsite but reports to offsite management.
8. Describe how the corporate official in overall charge of nuclear plant operations is actively involved in plant operational activities - i.e., what oversight and management responsibility and activities he personally handles.
9. Discuss how operational experience from within the organization and from other utilities, the NRC, INPO, etc., are obtained, reviewed and disseminated to plant operators. Describe the procedures used to assure that appropriate action is taken based on that information.
10. Describe how outside contractual assistance is relied on as technical or other support to operation of the nuclear plant including pre-op testing.
11. Describe the national standards and NRC regulatory guides that you use as criteria for your current offsite management and technical support staff.
12. Describe the provisions to be made for Shift Technical Advisors including qualifications, training, reporting channels, relations to shift staff.
13. Describe the training provisions for both licensed and unlicensed personnel, how many now in training, future intentions.
14. Describe the proposed QA organization for operation, relation to plant staff, where does it report, access to corporate level personnel.
15. Describe arrangements for safety review of plant operations, including onsite review and corporate review and audit.