



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NOS. 185 AND 190 TO FACILITY OPERATING

LICENSE NOS. DPR-44 and DPR-56

PHILADELPHIA ELECTRIC COMPANY
PUBLIC SERVICE ELECTRIC AND GAS COMPANY
DELMARVA POWER AND LIGHT COMPANY
ATLANTIC CITY ELECTRIC COMPANY

PEACH BOTTOM ATOMIC POWER STATION, UNIT NOS. 2 AND 3

DOCKET NOS. 50-277 AND 50-278

1.0 INTRODUCTION

By letter dated October 27, 1993, the Philadelphia Electric Company (the licensee) submitted a request for changes to the Peach Bottom Atomic Power Station (PBAPS), Unit Nos. 2 and 3, Technical Specifications (TS). The requested changes would delete the requirement for the 1) Plant Manager or Superintendent-Operations, 2) Assistant Superintendent-Operations, and 3) Superintendent-Technical or the Engineer-Systems to hold a Senior Reactor Operator (SRO) license, and add the requirement for the Senior Manager-Operations to hold an SRO license.

2.0 EVALUATION

This TS change involves the modification of the requirement for certain plant management personnel to hold an SRO license.

There is no regulatory requirement for the Assistant Superintendent-Operations or Superintendent-Technical or the Engineer-Systems to hold an SRO license. In addition, the Assistant Superintendent-Operations, the Superintendent-Technical, and the Engineer-Systems are not in the chain of command for the licensed operators at PBAPS; consequently, they do not direct the activities of the licensed operators and do not require an SRO license.

Regulatory Guide 1.8, "Personnel Selection and Training," endorsing ANSI Standard N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel", was issued in March 1971. Section 4.2.1, "Plant Managers," of ANSI N18.1-1971 states in part that, "The plant manager shall have acquired the experience and training normally required for examination by the AEC for a Senior Reactor Operator's License whether or not the examination is taken."

Furthermore, section 4.2.1 states that "In an organization which includes one or more persons who are designated as principal alternates for the plant manager and who meet the nuclear power plant experience and AEC examination requirements established for the plant manager, the requirements of the plant manager may be reduced, such that only one of his ten years of experience need to be nuclear power plant experience and he need not be eligible for AEC examination." The Senior Manager-Operations, who holds an SRO license, is designated as a principal alternate of the Plant Manager at PBAPS. Therefore, the Plant Manager is not required to hold an SRO license.

The Senior Manager-Operations, who supervises and directs the on-shift Operations organization, will continue to be required by the TS to hold an SRO license in accordance with ANSI Standard ANSI N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel."

The staff concludes that the proposed change to the PBAPS, Units 2 and 3 Technical Specifications deleting the requirement for the Plant Manager or the Assistant Superintendent-Operations or the Superintendent Technical or the Engineer-Systems to hold an SRO license, and requiring the Senior Manager-Operations to hold an SRO license, is consistent with and meets the intent of Regulatory Guide 1.8 and ANSI N18.1-1971, and is, therefore, acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Pennsylvania State official was notified of the proposed issuance of the amendments. The State official commented that the proposed amendment would result in the licensee decreasing from three SRO qualified managers to one. The State official further stated that in an emergency situation there should be sufficient defense in depth to allow for qualified replacements when needed. The State official thought that a decrease from three to two SRO qualified managers would be more appropriate.

The staff considered the State official's comments and determined that the amendment should be granted as requested. In reaching the determination, the staff reviewed the ANSI standard (i.e., ANSI N18.1-1971) that the licensee committed to complying with in their TS. The staff found that the licensee's amendment proposal is in accordance with the recommendations of the applicable ANSI standard and is therefore acceptable.

4.0 ENVIRONMENTAL CONSIDERATION

The amendments relate to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the 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 or environmental assessment need be prepared in connection with the issuance of the amendments.

5.0 CONCLUSION

The Commission 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 the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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Date: March 22, 1994