



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

March 29, 1994

Docket Nos. 50-277
and 50-278

Mr. George A. Hunger, Jr.
Director-Licensing, MC 52A-5
PECO Energy Company
Nuclear Group Headquarters
Correspondence Control Desk
P.O. Box No. 195
Wayne, Pennsylvania 19087-0195

Dear Mr. Hunger:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION (RAI) REGARDING TECHNICAL SPECIFICATIONS CHANGE REQUEST (TSCR) NO. 93-10, PEACH BOTTOM ATOMIC POWER STATION (PBAPS), UNITS 2 AND 3 (TAC NOS. M88146 AND M88147)

This letter requests additional information regarding your October 27, 1993, TSCR. Your TSCR would allow one of the on-shift Senior Reactor Operator (SRO) positions to be combined with the required Shift Technical Advisor (STA) position as recommended by the NRC's "Policy Statement on Engineering Expertise On Shift," issued on October 28, 1985.

Your TSCR did not explicitly state that a site specific assessment had been performed to verify that an operator filling the combined SRO/STA position could safely perform all required and necessary actions during off-normal events. On January 7, 1994, the NRC staff had a conference call with a member of your staff to attempt to resolve this issue. Your staff member informed us that a site-specific assessment had been performed.

Following my discussion with your staff member, I asked Region I to review the issue (through the NRC's Resident Inspector Staff). The Region I staff concluded that they had specific concerns with your TSCR. These concerns are documented in Region I Inspection Reports 50-277/93-31 and 50-278/93-31.

Therefore, the information available to us indicates that your assessment of this TSCR does not provide a sufficient basis for concluding that the SRO/STA position can be safely combined at PBAPS. In order for us to continue with our TSCR review, we will need additional information. Please answer the following questions within 30 days of receipt of this letter:

1. Describe the assessment that was done to determine the maximum demand that would be placed on the SRO/STA? (i.e., How did you determine the worst case scenario that an SRO/STA would face at PBAPS?) Also, discuss the results of this assessment.

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2. Did your assessment's conclusions rely only on the minimum number of operators specified in your TSCR or did it also rely on additional operators specified by administrative procedures? (Our conclusions on the safety of your TSCR must be based solely on the requirements in the Technical Specifications (which can only be changed with prior NRC approval) and not on your administrative procedures (which can be changed without prior NRC approval).

3. If an analysis for the Limerick Generating Station (LGS) was the basis for your conclusions at PBAPS, how did you determine that the assessment was also applicable at PBAPS? (i.e., What did you do to ensure there weren't significant differences between the demands on the SRO/STA at LGS and PBAPS?)

4. Did you analyze the SRO/STA's ability to perform their emergency director or emergency operating procedures direction responsibilities while also performing STA functions? If you did, where is this analysis documented?

The overall purpose of the questions is to assure us that the SRO/STA positions can be combined without harming the operators' (i.e., the SROs and ROs) ability to safely perform all required (i.e., required by the NRC) and necessary (i.e., required by PBAPS procedures) actions during off-normal events. Although the Commission's Policy Statement clearly recommends that the SRO and STA positions be combined, you should have performed a plant-specific assessment to justify the use of the policy statement. Your assessment should provide sufficient basis to cause an independent reviewer to reach the same conclusions.

We realize that you have already been granted an identical amendment for LGS. Your answers to the above questions will help us to determine if we need to take any actions regarding the previously issued LGS amendment.

This requirement affects less than ten respondents and, therefore, is not subject to Office of Management and Budget review under P.L. 96-511.

If you have any questions on this RAI, please call me at (301) 504-1422.

Sincerely,

/s/
Stephen Dembek, Project Manager
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

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DATE	3/27/94	3/28/94	3/29/94	3/29/94	

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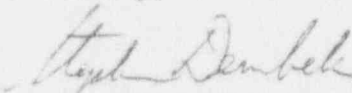
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Stephen Dembek, Project Manager
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

cc: See next page

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