



PEACH BOTTOM—THE POWER OF EXCELLENCE

D. B. Miller, Jr.
Vice President

PHILADELPHIA ELECTRIC COMPANY

PEACH BOTTOM ATOMIC POWER STATION

R. D. 1, Box 208
Delta, Pennsylvania 17314

(717) 456-7014

November 8, 1990

Docket Nos. 50-277
50-278

Lee H. Bettenhausen, Chief
Operations Branch
Division of Reactor Safety
USNRC, Region I
475 Allendale Road
King Of Prussia, PA 19406

SUBJECT: Allowable Senior Reactor Operator and Reactor Operator Duties
for: M. J. Ariano (RO), M. C. Tacelosky (RO), D. H. Gore (RO),
E. J. Eilola (RO), D. K. Hildebrand (RO), P. J. Habbershon (RO),
R. F. Truax (SRO), D. G. Falcone (SRO)

Dear Sir:

On October 31, 1990, USNRC Region I informed Philadelphia Electric Company that Senior Reactor Operator Licenses and Reactor Operator Licenses were issued for the subject Philadelphia Electric Company employees for Peach Bottom Units 2 and 3. Because these individuals were trained and examined on a revised set of Transient Response Implementing Procedures (TRIP's) which have not yet been placed in effect in the Peach Bottom control room, the following restrictions on licensed duties were imposed by the Superintendent-Operations in a letter to the Shift Managers dated November 1, 1990:

- a. subject Reactor Operators shall not be assigned as Chief Operator or as the Unit Reactor Operator of record on a Unit which is not shutdown until the new TRIP's are issued.
- b. subject Senior Reactor Operators shall not be assigned as Control Room Shift Supervisor until the new TRIP's are issued.

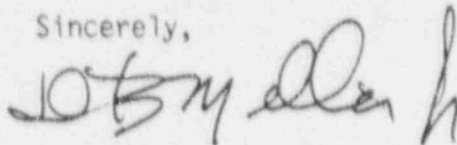
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The bases for these restrictions are as follows:

1. The new SRO licensees, while trained on the existing TRIP's as Reactor Operators, were not trained on them as SRO's. Precluding them from assignment as Control Room Shift Supervisor means that they will not have SRO duties associated with implementation of the existing TRIP's on either Unit.
2. The restrictions imposed on the RO licensees preclude them from assignment of licensed operator of record duties associated with a Unit which is not shutdown. While these individuals were not trained on the existing TRIP's, their performance of licensed duties on a shutdown Unit (Unit 3 is currently shutdown for a mid-cycle outage) is acceptable because:
 - a. The TRIP's are designed primarily for conditions other than shutdown.
 - b. The RO duties are supervised by a Senior Reactor Operator who has been trained on the existing TRIP's.
 - c. The likelihood of occurrence of an entry condition into T-101 or T-102 with the Unit shutdown is very remote. Should an entry condition occur with the Unit in outage, initial reactor operator actions would essentially already be complete or would not be applicable for a Unit in outage and reliance would be placed on the Shift Supervisor to direct use of the TRIP's.
 - d. The likelihood of occurrence of an entry condition into T-103 or T-104 with the Unit shutdown is very remote. Should an entry condition occur, the operator response is closely directed by the Shift Supervisor and the differences between the existing TRIP's and those used for RO training would not adversely influence performance by the Reactor Operator.

These restrictions were discussed with Mr. J. Lyash, USNRC Resident Inspector on November 5, 1990 and this information is being transmitted to you per his request.

Sincerely,



cc: R. A. Burrecelli, Public Service Electric & Gas
T. M. Gerusky, Commonwealth of Pennsylvania
J. J. Lyash, USNRC Senior Resident Inspector
T. T. Martin, Administrator, Region I, USNRC
H. C. Schwemm, Atlantic Electric
R. I. McLean, State of Maryland
J. Urban, Delmarva Power
USNRC Document Control Desk