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Docket Nos.: 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: Management Structure and Technical Resources Audit - Limerick

This letter will confirm earlier conversations with your staff establishing December 14-17, 1982 as the dates for the above-referenced audit by our Licensee Qualifications Branch. The agenda for this audit is provided in Enclosure 1. The activities on Tuesday, December 15 will commence at 9:00 AM with a presentation by your staff describing, in detail, the management structure and technical resources of the Philadelphia Electric Company. Enclosure 2 provides guidelines for the preparation of this presentation as well as a list of topics to be discussed during the audit, at your Headquarters and at the Limerick site. The week's activities will end with an exit meeting in which the results of the audit will be summarized. This meeting, to be held at the Limerick Information Center beginning at 9:00 AM on Friday, December 17, will be open to the public as observers.

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

Sincerely,

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

Enclosures:
As stated

cc: See next page

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Limerick

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Proposed Agenda

LQB MANAGEMENT STRUCTURE & TECHNICAL RESOURCES AUDIT
LIMERICK UNIT 1

Tuesday, Dec. 14 (All day beginning at 9:00 AM)

Discussion at PECO Corporate Offices with corporate management and staff on how the offsite organization and resources compares to the guidelines of Section II.B of NUREG-0731 and to the requirements of Items I.B.1.2 and I.C.5 of NUREG-0737.

Interviews with 5-6 selected corporate managers and corporate staff who provide direction and technical support for Limerick plant operations. Interviews will include discussion of technical qualifications, job responsibilities, directives and administrative procedures, and interfacing and communication with other corporate staff and with the onsite plant organization, and related matters.

Wednesday, Dec. 15 (All day) and Thursday, Dec. 16 (All day beginning at 9:00 AM)

Discussion at Limerick plant with plant operations management and staff on how the onsite organization compares to the guidelines of Section II.A of NUREG-0731, and how the requirements of the following items of NUREG-0737 are being effected.

I.A.1.1	I.C.2
I.A.1.2	I.C.3
I.A.1.3	I.C.4
I.B.1.2	I.C.5
	I.C.6

Interviews with 6-8 selected members of the plant management, operating and maintenance staffs, and technical support staff. Interviews will include discussion of technical qualifications, job responsibilities, interfacing and communication with other plant management and staff and with offsite management and staff, feedback of operating experience information, training, administrative procedures, and related matters.

Friday, Dec. 17 (Morning beginning at 9:00 AM)

Discussion at Limerick Information Center with plant and corporate management concerning results of this audit. Open to public.

TOPICS OF DISCUSSION

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 (May 13, 1980 Info. Report - SECY-80-242).
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.
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.