

PHILADELPHIA ELECTRIC COMPANY

LIMERICK GENERATING STATION

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January 28, 1991

Docket Nos. 50-352
50-353

License Nos. NPF-39
NPF-85

GRAHAM M. LEITCH
VICE PRESIDENT
LIMERICK GENERATING STATION

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

SUBJECT: Limerick Generating Station, Units 1 and 2
Systematic Assessment of Licensee Performance
Report Nos. 50-352/89-99 and 50-353/89-99
Submittal of Written Comments

Gentlemen:

NRC letter dated December 21, 1990, transmitted the NRC's Systematic Assessment of Licensee Performance (SALP) Board Initial Report Nos. 50-352/89-99 and 50-353/89-99 which provided an assessment of our Limerick Generating Station (LGS), Units 1 and 2, for the period September 1, 1989 through October 15, 1990. We then met with NRC representatives on January 8, 1991, at the LGS Energy Information Center to discuss the SALP Board assessments described in the Report and our plans to continue to improve performance. The December 21, 1990 letter also stated that we may provide written comments within 20 days after the meeting. Accordingly, this letter provides our written comments regarding the initial SALP Report by summarizing our presentations at the January 8, 1991 meeting.

Overall, we concur with the SALP Board's assessment of activities at LGS. We agree that the initial SALP Report accurately reflects our performance at LGS during a challenging period of completing the Unit 2 startup testing program and the transition to two unit operation, and recognizes the effectiveness of the corrective actions which are underway to strengthen identified weaknesses. Specifically, in the Emergency Preparedness (EP) area, we initiated a long-term improvement plan based on the recommendations of our management root cause assessment team. This plan, which includes maintaining strong senior management oversight, improving communications between corporate management and the EP staffs at the site and corporate office, increased EP staffing, an elevated site EP reporting level, and EP training improvements, is nearly complete. Significant improvements in the EP program have been achieved with ongoing management involvement and commitment to maintaining, as well as continued improvement of, the effectiveness of the EP program. We understand the NRC's concern for ensuring that the resources necessary to complete the long-term improvement plan are maintained during completion of the common Emergency Operations Facility for LGS and the Peach Bottom Atomic Power Station (PBAPS). EP program resources are and will remain committed to continued program improvement. Furthermore, management attention will continue to be focused on programmatic issues not only to maintain, but to continue to improve our EP program.

In the Engineering and Technical Support area, we agree with the SALP Board's assessment regarding the high quality of engineering work and the significant improvement in the modification process. We also recognize the improved

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communications resulting from our engineering/site interface meetings. Several initiatives, such as the establishment of a design review board, are being taken that will result in continued improvement in the quality of engineering work, timely responses to the NRC, and communications between corporate and the site groups.

We agree that the initial SALP Report also accurately identifies that insufficient management attention and oversight contributed to the unsatisfactory Licensed Operator Requalification (LOR) training program. We note that although the LOR training program was unsatisfactory, safe operation of LGS was not affected. LGS Operations and Training management has aggressively pursued the appropriate actions based on the recommendations from our root cause analysis to correct the identified weaknesses in the LOR training program. The corrective actions include the development of Operation Performance Standards similar to those of PBAPS and Control Room Teamwork Training based on a program developed by the Institute of Nuclear Power Operation's (INPO's) National Academy for Nuclear Training. As a result of these actions and increased management attention, we have noted improved operator performance during training and we are confident that these actions will result in an improved and satisfactory LOR training program.

In the Safety Assessment and Quality Verification area, we agree with the SALP Board's assessment that our management needs to aggressively and effectively identify problems in the areas that support plant operations (e.g., training, EP). Through the implementation of an improved and rigorous self-assessment process and also the root cause analysis process, we are confident that the early identification and resolution of problems will show significant improvement. This will also involve the focusing of proper management attention in areas that support the operation of the plant.

We are embarking on a new process at LGS called Quality Management. This process is now being developed and will focus on instilling pride in individual performances, helping to minimize personnel errors, and attaining personal accountability. This process will help solve the problems that the NRC and we identified as obstacles to achieving excellence. We are actively working to prevent the tendency towards complacency and are striving for professionalism and quality work in all areas. We are confident that these continued improvements and self assessments will result in a stronger LGS organization and will move us ahead to the goal of excellence.

Finally, we note a typographical error on page 7 of the initial SALP Report. Specifically, in the last paragraph, the reference should be to the "1990 Unit 1 outage."

If you have any questions, or need additional information, please contact us.

Very truly yours,



DBN/GHS:rgs

cc: T. T. Martin, Administrator, Region I, USNRC
T. J. Kenny, USNRC Senior Resident Inspector, LGS