

PHILADELPHIA ELECTRIC COMPANY

LIMERICK GENERATING STATION

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June 27, 1991

Docket Nos. 50-352
50-353
License Nos. NPF-39
NPF-85

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

SUBJECT: Limerick Generating Station, Units 1 and 2
Reply to an NRC Unresolved Item
(50-352/91-13-01; 50-353/91-14-01)
Associated With NRC Combined Inspection Report
Nos. 50-352/91-13 and 50-353/91-14

Dear Sirs:

This letter provides Philadelphia Electric Company's (PECo's) reply to an NRC Unresolved Item (50-352/91-13-01; 50-353/91-14-01) pertaining to the training and qualification of Radwaste Shippers at Limerick Generating Station (LGS), Units 1 and 2, and a clarification of PECO's commitment to NRC Bulletin 79-19, "Packaging of Low-Level Radioactive Waste for Transport and Burial." A written response within 30 days of receipt of this inspection report on these issues was requested by the NRC in the cover letter which transmitted the NRC Combined Inspection Report Nos. 50-352/91-13 and 50-353/91-14, dated May 23, 1991.

The NRC Inspection Report identified that there was a lack of adequate training for some of the Radwaste Shippers at LGS and that this concern was an unresolved item. Upon further review of the Radwaste Training and Qualification program we identified administrative deficiencies in our training records. These records have since been appropriately corrected. With appropriate documentation in place, we have determined that all Radwaste shipping personnel had been adequately trained and qualified. The four LGS Radwaste Shippers have had, as a minimum, an in-house eight hour Radioactive Material Minimization, Shipping, and Disposal course specific to LGS, and a thirty-two hour course in Radioactive Waste Packaging, Transportation, and Disposal. These training records associated with the LGS Radwaste Shippers are currently available for review.

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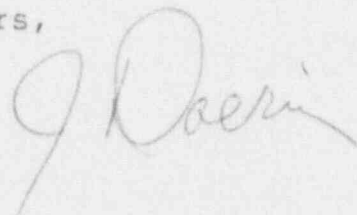
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Additionally, in response to your request for a clarification of our commitment to NRC Bulletin 79-19, we have reviewed our records and have confirmed our commitment to implement this Bulletin. NRC Bulletin 79-19 was issued August 10, 1979, to facilities holding an operating license. This Bulletin requested that licensees take several actions (e.g., training) to assure the safe transfer, packaging, and transport of low-level radioactive waste. The Bulletin required a written response outlining each licensee's implementation plan. At that time, LGS Units 1 and 2 were under construction and not licensed operating facilities, therefore, we were not required to provide a written response to this Bulletin. However, PECO did implement and committed to maintain the requirements of this Bulletin prior to receiving a facility operating license. This commitment was documented in the LGS Final Safety Analysis Report (FSAR) Table 13.2-1, "Matrix of LGS Training Program Guidelines," prior to obtaining an operating license from the NRC for LGS, Units 1 and 2. Section 13.2, "Training," of the FSAR was subsequently reviewed by the NRC in accordance with the applicable Standard Review Plan and the NRC approved our training program and associated lesson plans, which implement the requirements of Bulletin 79-19. This NRC approval is documented in the original Safety Evaluation Report, NUREG 0991.

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

Very truly yours,



WGS/cah

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