



PECO ENERGY

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February 10, 1995

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
Response to NRC Combined Inspection Report Nos.
50-352/94-27 and 50-353/94-27

By letter dated December 13, 1994, the NRC issued the subject inspection report which identified several NRC concerns regarding the selection and training of new supervisory personnel at Limerick Generating Station (LGS). Specifically, the NRC was concerned that: 1) our program for selection of supervisory personnel is not adequately defined to ensure selection of individuals meeting minimum NRC qualification criteria, and 2) the methodology for training selected individuals is not adequately defined to ensure the selected individuals have adequate technical and procedural knowledge to make informed decisions regarding their areas of assigned responsibility. This letter requested that PECO Energy Company provide the NRC with an evaluation of these matters and a description of the actions taken or planned, as appropriate, to address these areas within 60 days of the date of the letter. Our response to this request is provided below.

PECO Energy has always selected only those individuals who are qualified by experience and related technical and academic training for the appropriate supervisory positions. As such, it has only been necessary to ensure familiarity with position unique requirements following selection. However, based on our review of the NRC concerns identified above, we have concluded that there is opportunity for improvement in the programmatic controls for supervisory selection and training, and the consistency of the various PECO Energy documents that specify personnel qualification requirements. The following actions will be taken to address these issues.

The programmatic controls for supervisory selection and training will be enhanced through the development of a new common nuclear group procedure. This procedure will provide for the development of appropriate transition plans for individuals selected

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Docket Nos. 50-352 and 50-353
February 10, 1995
Page 2

for supervisory positions. Transition plans will include appropriate turnover and familiarization activities, such as review of the applicable procedures, etc. Transition plans will also include the implementation of additional technical training or experiential assignments for any selected individuals who do not already meet the minimum qualifications for the supervisory positions. In addition, this procedure will provide controls for maintaining the various PECO Energy documents that specify personnel qualification requirements up-to-date and consistent, and will strengthen the process for verification of personnel qualifications. This will ensure that individuals transitioning into supervisory positions are qualified and have sufficient technical and procedural knowledge to make informed decisions in their new areas of responsibility. This procedure is expected to be issued by July 31, 1995.

In addition to the development of a new common nuclear group procedure, the LGS Updated Final Safety Analysis Report (UFSAR) will be revised to clarify our commitment to ANSI/ANS 3.1-1978, "American National Standard for Selection and Training of Nuclear Power Plant Personnel," with respect to the qualifications of personnel responsible for the safe and efficient operation of LGS. In conjunction with this effort, the various PECO Energy documents that specify LGS staff personnel qualification requirements will be reviewed and revised, as necessary, to ensure consistency with the qualification requirements as specified in the revised UFSAR and ANSI/ANS 3.1-1978 for comparable positions. These efforts will also be completed by July 31, 1995.

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

Very truly yours,



GHS

cc: T. T. Martin, Administrator, Region I, USNRC
N. S. Perry, USNRC Senior Resident Inspector, LGS