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December 13, 1994

Mr. D. M. Smith
Senior Vice President -
Nuclear
PECO Energy
Nuclear Group Headquarters
Correspondence Control Desk
P. O. Box 195
Wayne, PA 19087-0195

SUBJECT: NRC COMBINED INSPECTION NOS. 50-352/94-27; 50-353/94-27

Dear Mr. Smith:

This letter refers to the inspection conducted by Messrs. R. L. Nimitz and J. Carrasco of this office on November 14-18, and 21 and 23, 1994, of activities authorized by NRC License Nos. NPF-39 and NPF-85 at the Limerick Nuclear Generating Station and to the discussions of our findings held by Mr. Nimitz with Mr. R. Boyce and other members of your staff.

Areas examined in this inspection are important to public health and safety, and are described in the NRC Region I Inspection Report which is enclosed with this letter. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspectors.

Within the scope of this inspection, no violations were identified. The inspectors determined that you had in place generally very good radioactive waste handling, processing, storage, and transportation programs. The programs were generally well managed with a good level of technical expertise available to support these programs. Your initiatives to evaluate and reduce generation of radioactive wastes are commendable.

Regarding radioactive waste storage activities, a number of potential programmatic enhancements were identified by the inspectors relative to storage of waste at the interim low-level waste storage facility. Your staff initiated a review of these matters and initiated actions, as appropriate, to ensure conformance with limiting operational criteria specified in the safety evaluation for the facility. These matters are further discussed in the enclosed NRC inspection report.

The inspectors identified a number of weaknesses in the selection criteria, training, and qualification program for supervisors. Specifically, the inspectors identified inconsistent selection and qualification criteria for certain supervisors, lack of an overall defined training and qualification methodology to ensure these individuals were adequately qualified from a technical and procedural knowledge standpoint, and lack of clear understanding of NRC qualification criteria for one supervisory position. One individual

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was determined by the inspectors to possess significantly less experience than had been credited to him by your staff. Your staff was informed that this individual was not considered adequately qualified for a position he had recently been selected for and was transitioning into. Your staff subsequently placed this individual under administrative restrictions. The specifics relative to these matters are also discussed in the enclosed NRC inspection report.

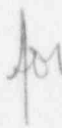
Although no safety concerns or apparent violations were identified relative to the above matters, we are concerned that; 1) your program for selection of supervisory personnel is not adequately defined to ensure selection of individuals meeting minimum NRC qualification criteria and; 2) the methodology 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. Consequently we request that, within 60 days of the date of this letter, you provide us an evaluation of these matters and a description of the actions, as appropriate, taken or planned by you to address these areas.

The response requested by this letter is not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96.511.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:
Richard R. Keimig

 James H. Joyner, Chief
Facilities Radiological Safety
and Safeguards Branch
Division of Radiation Safety
and Safeguards

Docket Nos. 50-352; 50-353

Enclosure: NRC Region I Combined Inspection Report Nos. 50-352/94-27;
50-353/94-27

cc w/encl:

J. Doering, Chairman, Nuclear Review Board
D. R. Helwig, Vice President - Limerick Generating Station
G. A. Hunger, Jr., Director - Licensing
J. L. Kantner, Regulatory Engineer - Limerick Generating Station
Secretary, Nuclear Committee of the Board
Commonwealth of Pennsylvania

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NAME	R. Nimitz <i>RLW</i>		J. Carrasco <i>RLW</i>		J. Jang <i>12/2</i> (Section 13)		R. Bores <i>12/7</i>		J. Joyner <i>12/13</i>	
DATE	12/02/94		12/2/94		12/2/94		12/7/94		12/13/94	

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