PHILADELPHIA ELECTRIC COMPANY 2301 MARKET STREET P.O. BOX 8699 PHILADELPHIA, PA. 19101 EDWARD G. BAUER, JR. (215) 841-4000 VICE PRESIDENT AND GENERAL COUNSEL EUGENE J. BRADLEY AST JCIATE GENERAL COUNSEL DONALD BLANKEN RUDOLPH A. CHILLEMI E. C. KIRK HALL T. H. MAHER CORNELL September 27, 1983 PAUL AUERBACH ASSISTANT GENERAL COUNSEL EDWARD J. CULLEN, JR. THOMAS H. MILLER, JR. IRENE A. MCKENNA ASSISTANT COUNSEL Mr. A. Schwencer, Chief Docket Nos. 50-352 Licensing Branch No. 2 50-353 Division of Licensing U. S. Nuclear Regulatory Commission Washington, D.C. 20555 Subject: Limerick Generating Station, Units 1 and 2 Safety Evaluation Report Open Issue Nos. 17 & 18 from NRC Licensee Qualification Branch (LQB) Reference: September 20, 1983 and September 21, 1983 Conference Calls between Philadelphia Electric and R. Benedict, NRC/LQB GOVT 1-1 (NRC) File: Dear Mr. Schwencer: Enclosed are draft FSAR changes developed as a result of the reference conference calls which we believe will resolve open review issue nos. 17 and 18, as described in the Limerick Safety Evaluation Report (NUREG-0991). We will incorporate these changes, exactly as they appear in the enclosures, in the FSAR revision scheduled for October, 1983. Sincerely. 8309300009 830927 PDR ADDCK 05000352 HDH/gra/G-4 Copy to: See Attached Service List

cc: Judge Lawrence Brenner (w/o enclosure) Judge Richard F. Cole (w/o enclosure) Judge Peter A. Morris (w/o enclosure) Troy B. Conner, Jr., Esq. (w/o enclosure) Ann P. Hodgdon, Esq. (w/o enclosure) Mr. Frank R. Romano (w/o enclosure) Mr. Robert L. Anthony (w/o enclosure) Mr. Marvin I. Lewis (w/o enclosure) Judith A. Dorsey, Esq. (w/o enclosure) Charles W. Elliott, Esq. (w/o enclosure) Jacqueline I. Ruttenberg (w/o enclosure) Thomas Y. Au, Esq. (w/o enclosure) Mr. Thomas Gerusky (w/o enclosure) Director, Pennsylvania Emergency Management Agency (w/o enclosure) Mr. Steven P. Hershey (w/o enclosure) Angus Love, Esq. (w/o enclosure) Mr. Joseph H. White, III (w/o enclosure) David Wersan, Esq. (w/o enclosure) Robert J. Sugarman, Esq. (w/o enclosure) Martha W. Bush, Esq. (w/o enclosure) Spence W. Perry, Esq. (w/o enclosure) Atomic Safety and Licensing Appeal Board (w/o enclosure) Atomic Safety and Licensing Board Panel (w/o enclosure) Docket and Service Section (w/o enclosure)

PROCEDURES - 4

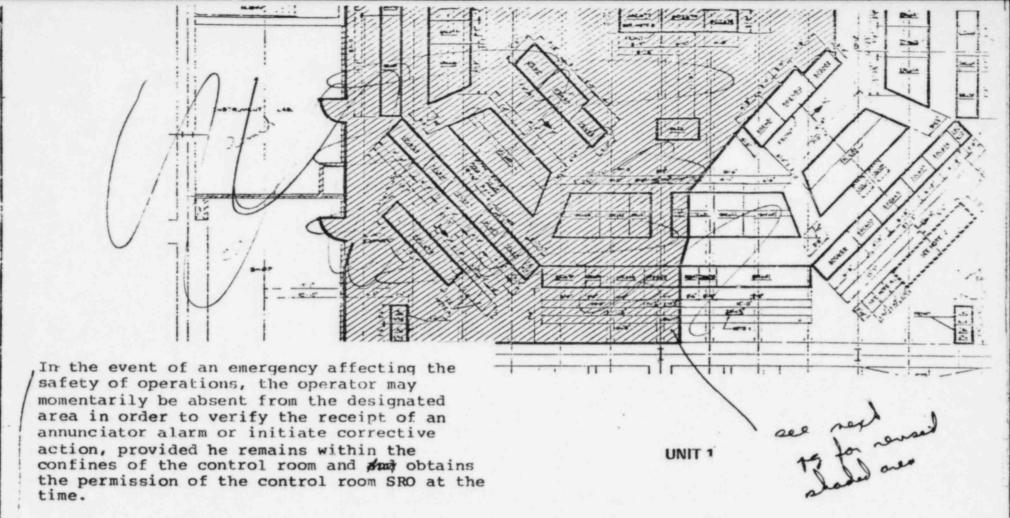
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This procedure shall also provide instructions to plant staff and operating personnel in areas of general and continuing applicability to plant management such as:

- a. The necessity to adhere to plant procedures and to refer directly to procedures for complex or extensive jobs where reliance on memory cannot be trusted, such as reactor startup, tasks that are infrequently performed, and complex tasks that must be performed in a specific order
- b. The responsibility of plant personnel to take action, in the event of an emergency not covered by approved procedures, so as to minimize personnel injury and damage to the facility, and to protect public health and safety
- c. Personnel conduct
- Availability on call of plant staff and operating personnel
- e. Preparation of plant logs and records
- f. Requirements for shift turnover
- g. Definition of "at the controls", per Figure 13.5-1
- h. Recording data or completing documentation as tasks are performed when such data or documentation of tasks is
- i. Definition of SRO Control Room Boundaries, per Figure 13.5-2,
 13.5.1.4 Procedure for Release of Safety-Related Equipment

This procedure shall implement the PECo standard requirements for blocking and tagging equipment and shall establish criteria for this function such as:

- a. Designation of personnel authorized to release equipment or systems for maintenance and the method of documenting such authorization
- b. Aspects to be considered in releasing equipment such as: how long equipment may be out of service; potential for degradation of protection when one subsystem of a redundant safety system has been removed from service; equipment and personnel safety
- c. Aspects to be considered in returning equipment to service such as removal of jumpers and test signals and



(1) Only control panels associated with the operation of that unit or common unit panels are included inside the defined boundary. If, in the future, panels are added to the control room, they are necessarily included in the definition of "at the controls" for that unit. Office, utility, or rest facilities are not included in the defined boundary with the following two exceptions: The unit 2 operator may open the Shift Superintendent or adjacent office door, for verbal communication as long as be remains in the area circumscribed by the door and the boar is held open. The same situation applies to the unit 1 operator and the instrument lab and shop doors as indicated.

(2) Normal "at the controls" locations do not apply during any condition during which the control room is not habitable. In that event, the "at the control" location is the Emergency Shutdown Panel for that unit.

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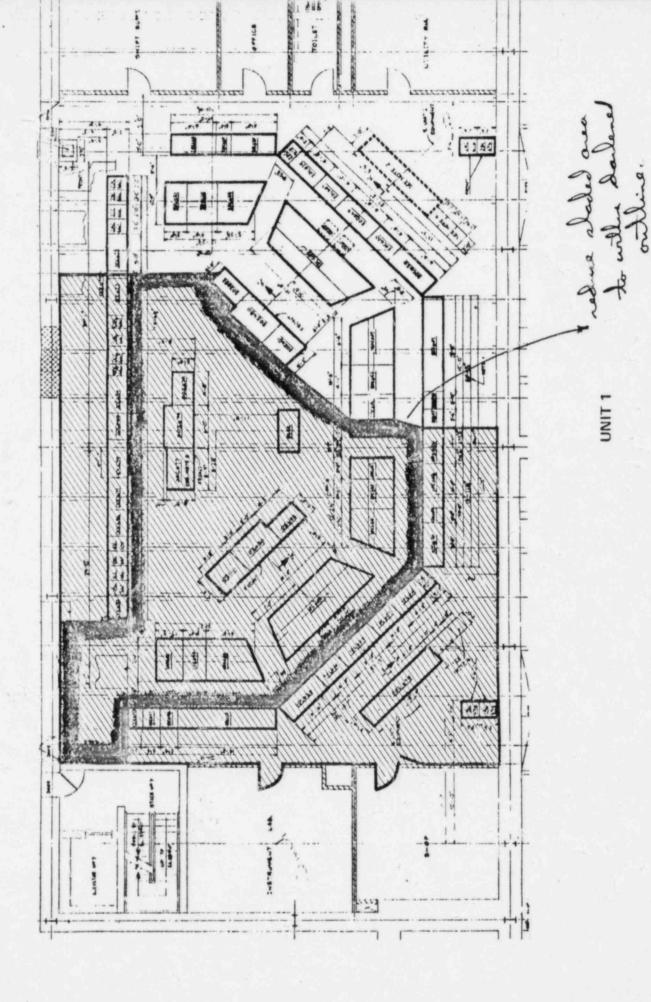
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LIMERICK GENERATING STATION UNITS 1 AND 2 FINAL SAFETY ANALYSIS REPORT

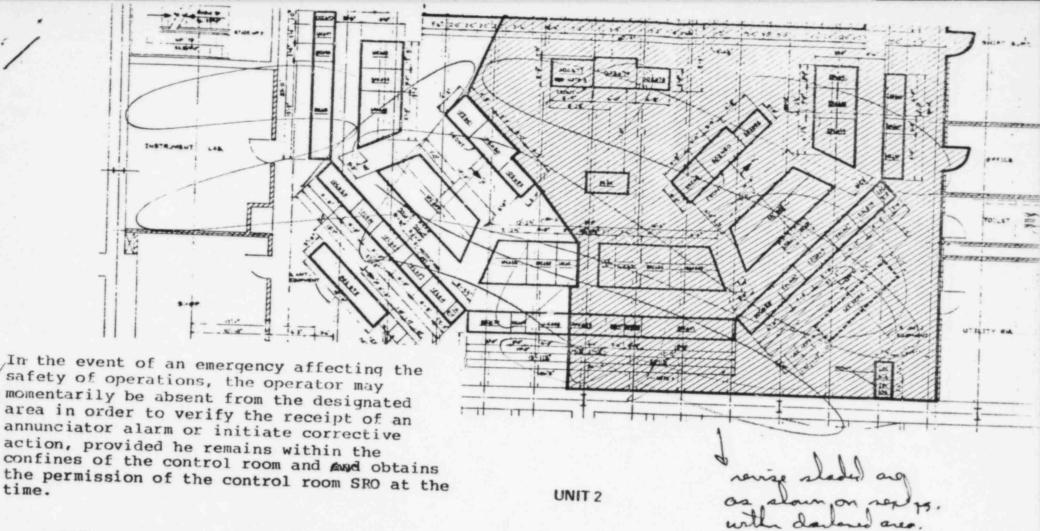
> DEFINITION OF "AT THE CONTROLS"

FIGURE 13.5-1

SHEET 1 OF 2



i



(1) Only control panels associated with the operation of that unit or common unit panels are included inside the defined boundary. If, in the future, panels are added to the control room, they are necessarily included in the definition of "at the controls" for that unit. Office, utility, or rest facilities are not included in the defined boundary with the following two exception: The unit 2 operator may open the Shift Superintendent or adjacent office door, for verbal communication as long as he remains in the area circumscribed by the door and the door is held open. The same situation as indicated.

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LIMERICK GENERATING STATION UNITS 1 AND 2 FINAL SAFETY ANALYSIS REPORT

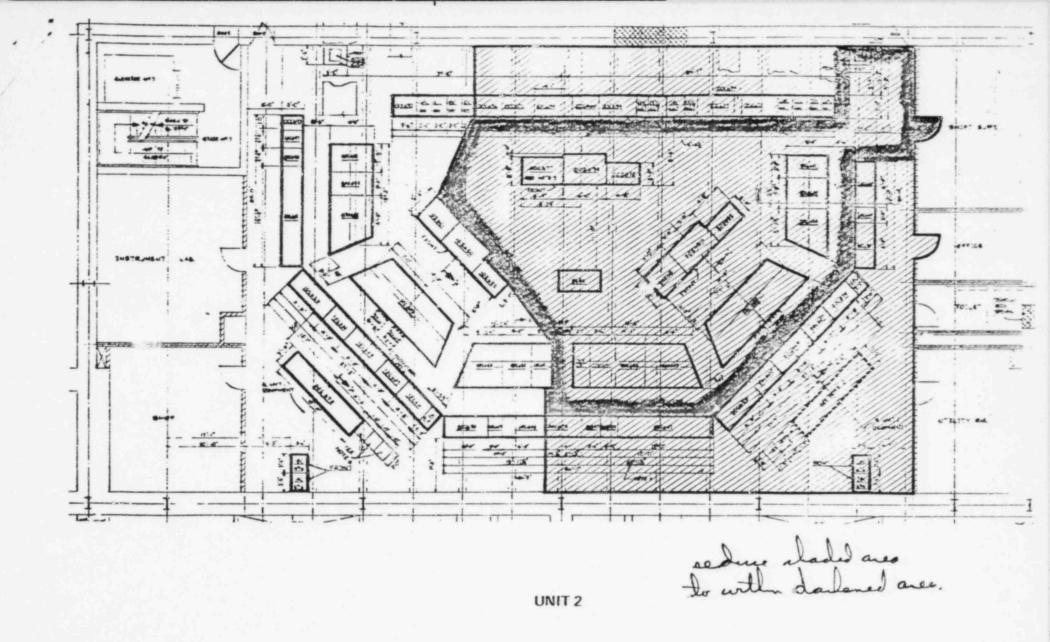
> DEFINITION OF "AT THE CONTROLS"

FIGURE 13.5-1

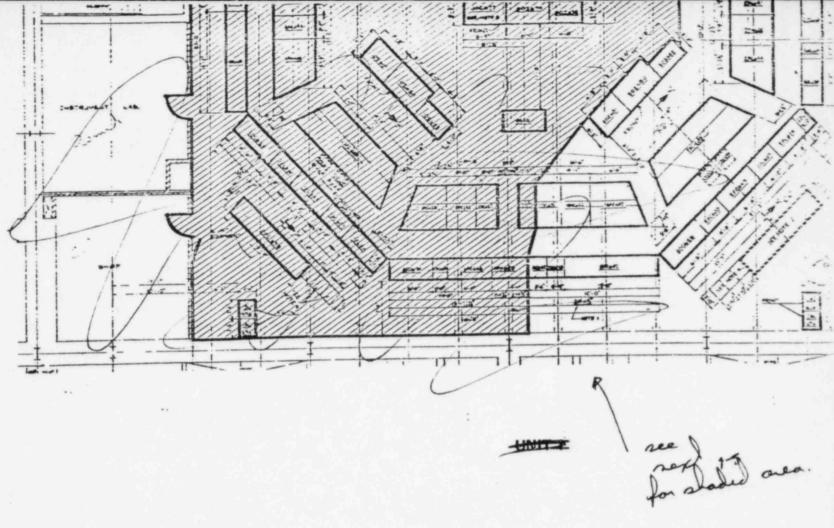
SHEET 2 OF 2

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(1) Only control panels associated with the operation of that unit or common unit panels are included inside the defined boundary. If, in the future, panels are added to the control room, they are necessarily included in the definithon of "at the controls for that unit. Office, utility, or rest facilities are not included in the defined boundary with the following two exceptions: The unit 2 operator may open the Shift Superintendent or adjacent office door, for verbal communication as long as he remains in the area circumscribed by the door and the door is held open. The same situation applies to the unit 1 operator and the instrument lab and shop doors, as indicated.



es indicated?

(1) Only control panels associated with the operation of that unit or common unit panels are included inside the defined boundary. If, in the future, panels are added to the control room, they are necessarily included in the definition of "at the controls" for that unit. Office, utility, or rest facilities are not included in the defined boundary with the following the exceptions: The unit?

The common unit panels associated with the control room, they are necessarily included in the defined boundary with the following the exceptions: The unit?

SRO scribed boundary with the following the exceptions: The unit?

SRO scribed by the door and the door is held open. The same situation applies to the unit 1 operator and the instrument lab and shop doors,

(2) Normal "at the controls" locations do not apply during any conditioncuring which the control room is not habitable. In that event, the "at the control" location is the Emergency Shutdown Panel for that— "unit."

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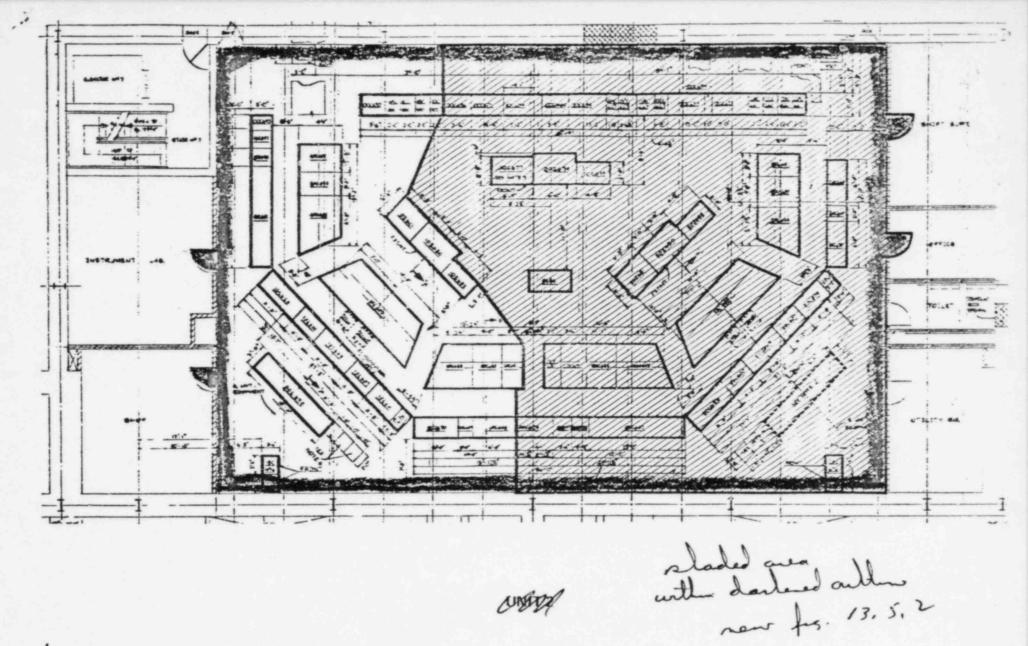
LIMERICK GENERATING STATION UNITS 1 AND 2 FINAL SAFETY ANALYSIS REPORT

SRO Costal Room Boundaries

DEFINITION OF

FIGURE 13.5-\$

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(1)/

Only control panels associated with the operation of that unit or common unit zanels are included inside the defined boundary. If, in the future, panels are added to the control coom, they are necessarily included in the definition of at the controls for that unit. Office, utility, or rest facilities are not included in the defined boundary with the following two exceptions: The unit 2 operator may open the Shift Superintendent or adjacent of the door, for verbal communication as long as he remains in the are circumscribed by the door and the door is held open. The same situation applies to the unit 1 operator and the instrument lab and shop doors, as indicated.

PROCEDURES -5)

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Such checklists or logs shall include any equipment under maintenance or test that by itself could degrade a system critical to the prevention and mitigation of operational transients and accidents or initiate an operational transient (what to check and criteria for acceptable status shall be included on the checklist); and

(3) A system shall be established to evaluate the effectiveness of the shift and relief turnover procedures (for example, periodic independent verification of system alignments).

Response

The requirements stated in this section will be implemented except for the request to establish separate checklists or logs for use by the offgoing and ongoing auxiliary operators and maintenance technicians.

A variety of shift turnover checklists or logs, situated in various locations of the plant and under the control of many groups would further hinder the transfer of vital information to the operating shift personnel with primary responsibility for plant operations. A limited number of checklists or logs, centralized in the control room and under the supervision of control room personnel, is essential to effective transfer of information.

Maintenance and testing of equipment vital to safe operation of the plant is performed with the knowledge and approval of the appropriate licensed control room operator. The checklists, status boards, or logs will be utilized to identify any equipment under maintenance or test that by themselves could degrade a system critical to the prevention and mitigation of operational transients and accidents, or initiate an operational transient. Some of this information will be supplied to the control room operators and supervisors, as appropriate, by the auxiliary operators and technicians for entry into the checklists and logs. Shift personnel meetings under the direction of shift supervision are normally held shortly after shift turnover. The auxiliary operator's participation in these meetings includes review of the checklists and logs. These methods are considered more effective in the transfer of vital information during shift turnover than the use of separate logs by the auxiliary operators and technicians.

I.C.3 SHIFT SUPERVISOR RESPONSIBILITIES

This item is included with Section I.A.1.2, Shift Supervisor Duties.

Response

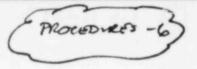
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1.13-14

Offgoing auxiliary operators will normally be relieved at their job locations in the plant, with a verbal report providing oncoming individuals with information (e.g., status of plant equipment and system alignment) on the past shift significant activities and present operations in progress as related to the specific job position. If plant conditions permit, the auxiliary operators would participate in the shift personnel meetings and receive any additional information deemed necessary by shift supervision and control room operators.

INSERT FOR PG 1.13-14



13.1.2.17 Training Coordinator

The Training Coordinator is responsible for establishing and implementing all facets of the station training program to meet the training requirements described in Section 13.2. The Training Coordinator is responsible for developing the required training procedures to ensure that the training program is appropriately documented and that the fulfillment of training requirements is recorded.

13.1.2.18 Succession of Authority

During normal operation, the Station Superintendent is responsible for all station activities. In his absence, the Assistant Station Superintendent assumes these responsibilities. If both the Station Superintendent and the Assistant Station Superintendent are unavailable, absent, or incapacitated, the following persons, in the order listed, are responsible for all station activities:

- Technical Engineer
- b. Operations Engineer

13.1.2.19 Operating Shift Crew

The position titles, applicable operator licensing requirements, and minimum number of personnel for each shift are described in Table 13.1-2 for the various combinations of units in either the operating or cold shutdown mode. Six shifts provide 24-hoursper-day, 7-days-per-week operating coverage.

In addition to the above, Shift Technical Advisors (STAs) are assigned. The STA is available to report promptly to the control room following a notification to perform the accident assessment wiest function during a plant transient. The STA has no duties or responsibilities for manipulation of controls or command of operations during the transient. During a transient, the STA observes control room instrumentation and, emergency core cooling system (ECCS) operation and availability to determine that the transient is proceeding as predicted. The STA advises the shift superintendent of significant adverse conditions. After a stable condition has been achieved, the STA aids shift personnel in

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Shift clerks will be provided to relieve Shift Supervision of many purely administrative duties which might interfere with their primary responsibility for the safe operation of the plant. These activities may include: timekeeping, document control (procedures, drawings, instruction manuals), key issuance as directed by shift supervision, and information input and retreival from various computers.

INSERT FOR PG 13.1-14



proper conduct of the radiation protection program and access to offsite management. The Director - Radiation Protection Section also provides a means for ensuring that applicable experience gained at Limerick or Peach Bottom is reflected in the procedures and practices of both stations. The Director - Radiation Protection Section meets the qualifications of "engineer-in-charge" as defined in Section 4.6.1 of ANSI/ANS-3.1-1978 in regard to the support provided.

The Nuclear Training Section is responsible for the training programs for licensed NRC operators (qualification and requalification), replacement training for licensed operators and senior operators, and non-licensed operations personnel and general employee training. The section supervises, conducts, and keeps records of the necessary training. The section is responsible for preparing and updating the training program.

13.1.1.1.2 Maintenance Division

INSERT () PAGE FOLLOWING

The Maintenance Division is under the direction of a Superintendent and is responsible for performing maintenance and repair work under the direction and coordination of the Maintenance Engineer on the plant operating staff. Personnel in the Maintenance Division have the benefit of experience gained through years of providing maintenance support for Peach Bottom Atomic Power Station - Units 2 and 3.

13.1.1.2 Engineering and Research Department

The Engineering and Research Department is under the direction of the Vice-President. The Vice-President is responsible for the establishment of policies directed toward the design, construction, and modification of Limerick Generating Station in accordance with applicable codes, standards, and regulations.

The Engineering and Research Department reviewed and approved material and component specifications, approved procurements, participated in or reviewed site-related engineering work and environmental studies, reviewed system designs, and participated in the monitoring and management of construction activities during the design and construction phase. These design and engineering aspects are essentially complete.

INSERT (), PG. 13.1-3

The Nuclear Safety Section, under the supervision of an Engineer-In-Charge, reports to the Superintendent-Nuclear Services on matters of a routine nature, and to the Chairman of the Operating and Safety Review Committee on matters of a safety-related nature. The Section is responsible for independently examining the safety-related activities at the nuclear plants operated by the Philadelphia Electric Company, and providing support to the Operating and Safety Review Committee. The Nuclear Safety Section consists of three groups: a Corporate Independent Safety Engineering Group (ISEG), an on-site ISEG at Limerick Generating Station, and an on-site ISEG at Peach Bottom Atomic Power Station. The Engineer-In-Charge of the Nuclear Safety Section meets the qualifications of "engineer-in-charge" as defined in Section 4.6.1 of ANSI/ANS-3.1-1978.

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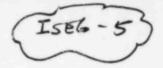


TABLE 13.1-4

(Page 1 of 29)

ENGINEER-IN-CHARGE RESUMES

Resumes for the following "Engineers-ir-Charge" are included, as identified in Section 13.1.1:

Electric Production Department/Generation Division-Nuclear (Section 13.1.1.1):

Engineer-in-Charge, Licensing Section

Engineer-in-Charge, Nuclear Safety Section

Engineering and Research Department/Mechanical Engineering Division (Section 13.1.1.2.1)

Engineer-in-Charge, Nuclear and Environmental Section Engineer-in-Charge, Power Plant Design Section Engineer-in-Charge, Power Plant Services Section Engineer-in-Charge, Industrial Section Engineer-in-Charge, Civil Section

Engineering and Research Department/Electrical Engineering Division (Section 13.1.1.2.2):

Engineer-in-Charge, Station Engineering Section Engineer-in-Charge, Electrical Equipment Section Engineer-in-Charge, Field Engineering Section Engineer-in-Charge, Computer & Controls Section Engineer-in-Charge, Transmission & Distribution Engineering Section

Engineering and Research Department/Research and Testing Division (Section 13.1.1.2.3):

Engineer-in-Charge, Station Tests Section

TABLE 13.1-4 (Cont'd)

Electric Production Department
Nuclear Generation Division
Engineer-In-Charge
Nuclear Safety Section

DATE APPOINTED:

February 1983

NAME:

George A. Hunger, Jr.

EDUCATION AND TRAINING:

1968 B.S of Mechanical Engineering - Lafayette College

1970 M.S. of Nuclear Engineering - University of Virginia

1981 Kepner-Tregoe Leadership Development Institute

1983 Management Oversight and Risk Tree Seminar

WORK EXPERIENCE:

1970 to date Philadelphia Electric Company

1970 - 1975 Engineer - Research and Testing

Division - Energy Conversion Research Section - Involved in assessments of advanced nuclear concepts and participated on industry and

Electric Power Research Institute

review/research committees.

1973 - 1983 Alternate member of Peach Bottom Operation and

Safety Review Committee

1974 - 1977 Instructor of Nuclear Engineering courses at

Drexel University

Table 13.1-4 (Cont'd)

Page 2

1976 - 1980

Engineer - Mechanical Engineering Division - Nuclear and Environmental Engineering Section - Involved with Peach Bottom modifications and licensing activities and design review for Limerick.

1980 - 1982

Administrative Analyst - Corporate Planning & Analysis Division - Involved with corporate studies, jointly-owned nuclear facilities management committee and taught management courses (Kepner-Tregoe).

1983 - Present

Engineer-In-Charge, Nuclear Safety Section.

PROFESSIONAL ACTIVITIES:

Registered Professional Engineer in the Commonwealth of Pennsylvania

Member of ANS - Past Chairman of ANS - Delaware Valley Section

Member of ASME

(ISEC-C)

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TABLE 13.1-5

ELECTER PRODUCTION DEPARTMENT NUCLEAR GENERATION DIVISION SUPERINTENDENT - NUCLEAR SERVICES RESUME

Blectric Production Department Nuclear Generation Divison Superintendent Nuclear Services

DATE APPOINTED:

February 1983

NAME:

Werner T. Ullrich

EDUCATION AND TRAINING:

1957 B.S. of Electrical Engineering - Drexel Institute of Technology

1960 Nuclear Engineering Course - Vitro Engineering

EXPERIENCE:

1957 to date

Philadelphia Electric Company

1957 - 1962

Engineer - Electrical Engineering Division - Field Engineer - Involved post construction and initial energization testing of electric transmission lines, substations and controlled circuitry.

1962 - 1963

Engineer - Material Testing Reactor, National Reactor Testing Station, Idaho - Worked as a member of the operating shift, operating the reactor and experiments to gain experience in the nuclear field.

1963 - 1967

Shift Reactor Engineer - Peach Bottom Atomic Power Station - Worked in a shift supervisory capacity during the pre-operational testing, initial fuel loading, and start-up testing of the 40 MWe High Temperature Gas Cooled Reactor (HTGR). Obtained NRC Senior Operator License for the HTGR in 1965.

1967 - 1968

Plant Engineer at Peach Bottom Atomic Power Station - Responsible for maintenance of HTGR as well as operator training. 1968 - 1971

Assistant Station Superintendent, Peach Bottom Atomic Power Station - Responsible for operations of HTGR and development of organization and training programs for boiling water reactors in construction on the same site.

1969

Completed Observation Program at the General Electric Boiling Water Reactors Simulator at Dresden.

1971 - 1983

Station Superintendent, Peach Bottom Atomic Power Station - Responsible for the operation of the 40 MWe HTGR through 1975; the preoperational testing, start-up and commercial operation of the two 1100 MWe boiling water reactors. These units achieved commerical operation in 1975.

1983 to present

Superintendent-Nuclear Services - Responsible for off-site support activities in the Nuclear Generation Divison for both Peach Bottom and Limerick. This includes: The Nuclear Safety Section; Emergency Preparedness Section; Licensing Section; Nuclear Training Section; and, Radiation Protection Section.

PROFESSIONAL ACTIVITIES:

Member of the American Nuclear Society -Standard Operations Subcommittee (ANS-3) since 1978. Assumed Vice-Chairmanship of this committee, effective 1/1/81.

Member of the Board of Directors of the Institute of Nuclear Power Plant Operations since March 1981 - Fills one of the two positions assigned to individuals who have had recent experience in the management of an operating nuclear power plant.

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may appoint, in writing (such as in Committee meeting minutes), subcommittees for purposes such as performing reviews or studies in areas of particular expertise or for performing special investigations.

The O&SR Committee, and those performing reviews or audits under the cognizance of the Committee, shall have access to records and personnel as necessary to properly perform their functions. The O&SR Committee shall be kept current on events within its responsibility by reviewing reports and by the activities of the Committee members.

The O&SR Committee shall meet at least once every calendar quarter during the initial year of Unit 1 operation following fuel loading, and at least once every six months (or more often as determined by the chairman) thereafter. A quorum shall consist of the chairman, or his designated alternate, and four members or alternates. No more than a minority of the quorum shall have line responsibility for operation of the plant.

The O&SR Committee shall review:

- a. The safety evaluations for 1) changes to procedures, equipment or systems and 2) tests or experiments completed under the provision of 10 CFR 50.59, to verify that such actions did not constitute an unreviewed safety question.
- b. Proposed changes to procedures, equipment or systems that involve an unreviewed safety question as defined in 10 CFR Part 50.59
- c. Proposed tests or experiments that involve an unreviewed safety question as defined in 10 CFR Part 50.59
- d. Proposed changes to technical specifications or the operating license prior to submittal to the NRC
- e. Violations of codes, regulations, orders, technical specifications, license requirements, or of internal procedures or instructions having nuclear safety significance. This shall normally be accomplished by review of PORC meeting minutes, special reports, or reports of audits.
- f. Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety. This shall normally be accomplished by review of PORC meeting minutes, special reports, or reports of audits.

INSERT @ PG. 13.4-4

The O&SR consists of the following members and their alternates:

Members

Manager-Electric Production, Chairman

Vice President-Engineering & Research, Vice-Chairman

Superintendent-Maintenance Division

Director-Environmental Affairs

Superintendent-Quality
Assurance Division
Electric Production

Chief Mechanical Engineer

Director-Research and Testing

Chief Electrical Engineer

Chairman-Nuclear Review Board* Salem Generating Station

Alternate

Superintendent-Nuclear	Generation
Division	

Chief Design Engineer

Superintendent-Elec	trical	Section
Maintenance Divis	ion	

Chief Chemist

Engineer-in-Cha	rge - Quality
Assurance Se	ction - Engineering
and Research	

Engineer-in-Charge - Power Plant Design Section

The members and alternates of the O&SR meet the qualifications of Section 4.7.2 of ANSI/ANS-3.1-1978. The Chairman and Vice-Chairman of the O&SR meet the qualifications of Section 4.7.1 of ANSI/ANS-3.1-1978.

Engineer-in-Charge - Energy Conversion Research Section

Supervising Engineer-Plant Control Systems

General Manager-Hope Creek* Generating Station

^{*} Employees of Public Service Electric and Gas Company.

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c. The corporate support group within the Nuclear Safety Section will screen external operating experience information and will send pertinent operating experience information to the Independent Safety Engineering Group (ISEG). The ISEG will review this information and internal operating experience information, provide comments as appropriate, and distribute the information and the comments to the appropriate personnel on plant staff. If the ISEG determines that specific action should be taken at the plant, these recommended actions will be discussed with the appropriate personnel on plant staff and then submitted to the Engineer-In-Charge of the Nuclear Safety Section.

If during the screening process by the corporate support group, operating experience information is determined to be urgent in nature, a copy of the operating experience information will be sent directly to the Plant Superintendent and the Operations Engineer, and the review by ISEG will be expedited.

Also, if any operating experience information is determined during the screening process or during ISEG review to need a broader interdisciplinary review, the information will also be sent to the Operating Experience Assessment Committee. This Committee will consist of representation from ISEG, Plant Staff, Quality Assurance, Mechanical Engineering, and Electrical Engineering.

- d. Timely information regarding operating experience is now available to the company through the INPO Notepad System. The corporate support group within the Nuclear Safety Section will review the Notepad items and forward applicable entries to the ISEG, Operations Engineer, and other plant and corporate personnel.
- e. The Administrative Procedure that will detail how operating experience is disseminated to the applicable organizations and persons within the plant staff will be written prior to fuel load. However, dissemination of operating experience as described in item d, in particular Notepad items and Licensee Reports, is currently being done so that licensed operators and those to be licensed in the future are aware of operating events that are occurring within the industry. This program will continue through the writing of the formal Administrative Procedure.

REPLACE WITH
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Q 630.32 Response

C. The Corporate Independent Safety Engineering Croup (ISEG) within the Nuclear Safety Section will screen external operating experience information and will send pertinent operating experience information to the Limerick ISEG. The Limerick ISEG will review this information and internal operating experience information, provide comments as appropriate and distribute the information and the comments to the appropriate personnel on plant staff. If the Limerick ISEG determines that specific actions should be taken at the plant, these recommended actions will be discussed with the appropriate personnel on plant staff and then submitted to the Engineer-In-Charge of the Nuclear Safety Section.

If during the screening process by the Corporate ISEG, operating experience information is determined to be urgent in nature, a copy of the operating experience information will be sent directly to the Station Superintendent, and the review by the Limerick ISEG will be expedited.

Also, if any operating experience information is determined during the screening process or during Limerick ISEG review to need a broader interdisciplinary review, the information will also be sent to the Operating Experience Assessment Committee. This Committee will consist of the Engineer-In-Charge of the Nuclear Safety Section, the Limerick and Peach Bottom Operations Engineers, representation from the Limerick ISEG, Quality Assurance, Mechanical Engineering, the Peach Bottom ISEG, Electrical Engineering and the Licensing Section.

d. Timely information regarding operating experience is now available to the company through the INPO Notepad System. The Corporate ISEG within the Nuclear Safety Section will review the Notepad items and forward applicable entries to the ISEG Station Superintendent Operations Engineer and other plant and corporate Limerick personnel.

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Information Letters and the Institute of Nuclear Power Operations Significant Operating Experience Reports

- Track implementation status of significant corrective action with regard to ISEG recommendations
- e. Provide onsite technical assistance, when required, to assist in Limerick ISEG investigations
- f. Provide an interface between the Limerick ISEG and Engineering and Research Department personnel, located in the corporate offices, who design plant modifications.

The Operating Experience Assessment Committee will be composed of representatives from plant staff from both Limerick and Peach Bottom, from ISEG groups at both Limerick and Peach Bottom, from Electric Production Department's Quality Assurance Division and from Engineering and Research Department's Mechanical Engineering and Electrical Engineering Divisions. The committee members will receive, on a continuing basis, significant internal and external operating experience information, and will meet monthly to discuss it. This committee will provide a broad interdisciplinary review and may make recommendations on improving operations, procedures, training, and maintenance. This committee will facilitate the exchange of information on operating and design problems encountered at both Limerick and Peach Bottom

Also, because the Limerick and Peach Bottom plant designs are similar, many of the Peach Bottom ISEG's assessments, particularly in the areas of design, training, corrective maintenance and, to some extent, operations, may be directly applicable to Limerick and vice versa. The Peach Bottom ISEG will be similar in composition to and will have similar responsibilities as the Limerick ISEG.

The Engineer-In-Charge of the Nuclear Safety Section reports to the Superintendent-Nuclear Services on matters of a routine nature and to the Chairman of the Operating and Safety Review Committee on matters of a safety-related nature.

REPLACE WITH INSERT 3,

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INSERT (3), PG. 13.4-8

The Operating Experience Assessment Committee will be composed of the Operations Engineers from plant staff from both Limerick and Peach Bottom, engineers from ISEG groups at both Limerick and Peach Bottom, an engineer from Electric Production Department's Quality Assurance Division, an engineer from Electric Production Department's Licensing Section and engineers from Engineering and Research Departments's Mechanical Engineering and Electric Engineering Divisions. The members will be degreed engineers that have, as a minimum, several years of nuclear plant operations or design experience. The Chairman of the committee will be the Engineer-In-Charge of the Nuclear Safety Section. The Vice-Chairman will be the Senior Engineer-Special Projects of the Licensing Section. The committee members will receive, on a continuing basis, significant internal and external operating experience information, and will meet monthly to discuss it. This committee will provide a broad interdisciplinary review and may make recommendations on improving operations, procedures, training, and maintenance. The ISEGS will inform the committee with results of their reviews of operating experience and operating problems. This committee will facilitate the exchange of information on operating and design problems encountered at both Limerick and Peach Bottom.