

PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

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February 20, 1992

D. M. SMITH
SENIOR VICE PRESIDENT - NUCLEAR

Docket Nos. 50-277
50-278
License Nos. DPR-44
DPR-56

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

SUBJECT: Peach Bottom Atomic Power Station, Units 2 and 3
Response to Request for Additional Information
Regarding NRB Chairman and Shift Managers

- REFERENCES:
- (1) Letter from D. M. Smith (PECo) to NRC dated October 16, 1991
 - (2) Letter from D. M. Smith (PECo) to NRC dated October 17, 1991
 - (3) Letter from C. L. Miller (NRC) to D. M. Smith (PECo) dated December 16, 1991

Dear Sir:

In Reference (1), Philadelphia Electric Company (PECo) advised the NRC of our plans to change the Chairman of the Nuclear Review Board (NRB) from a full-time to a part-time position. In Reference (2), PECO advised the NRC of our plans to no longer require the Shift Manager at Peach Bottom to hold a degree. In Reference (3), the NRC requested additional information regarding these two issues. The purpose of this letter is to provide that information. The Enclosure to this letter provides a restatement of each NRC concern followed by PECO's response.

If you require any additional information regarding either of these two subjects, please do not hesitate to contact us.

Sincerely,



Enclosure

cc: T. T. Martin, Administrator, Region I, USNRC
J. J. Lyash, USNRC Senior Resident Inspector, PBAPS

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Concerning the issue of time resource, one contributing factor to our decision to make the NRB Chairman a part-time position was our evaluation that the responsibilities did not require the resources of a full-time individual. Furthermore, all PECO managers are expected to identify any inability to perform assigned duties as a result of workload. Therefore, we would expect the individual serving as the part-time NRB Chairman to identify to senior management any difficulties in performing his duties associated with either the NRB Chairmanship or his other assigned position, before either position was compromised. This expectation has been clearly emphasized with the individual now serving as the NRB Chairman.

Concerns Related to the Shift Manager

RESTATEMENT OF NRC CONCERN:

The staff questions whether a fundamental relationship has been established between the Shift Manager having a degree and his or her ability to represent station management on shift.

PECO RESPONSE:

All Shift Managers are second level station management, rather than representatives of station management. The effectiveness of a Shift Manager as a member of station management is dependent upon our selection and training process and the caliber of the individual, rather than the qualification prerequisite of a degree. This conclusion is based, in part, on our observations of our best Shift Supervisors (first level station management), our observations of other successful stations and our experience at Limerick Generating Station (LGS). At LGS, individuals in the Shift Manager position are not required to have a degree. There has been no evidence of detachment from other parts of station management or an inability to represent senior management positions on issues of interest to shift personnel.

We also feel that the training and selection process for Shift Managers further ensures their ability to function on shift as members of station management. It is our intention to continue staffing the Shift Manager position with the most qualified candidates.

RESTATEMENT OF NRC CONCERN:

The staff requests that you provide additional discussion of the long-term plans for Shift Manager staffing including the following:

- (1. Your views as to whether the proposal is consistent with the fundamental objectives of the Shift Manager position.

PECO RESPONSE:

The fundamental objective of the Shift Manager position is to provide leadership regarding the operation of the plant based on technical

Peach Bottom Atomic Power Station, Units 2 and 3
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Concerns Related to NRB Chairman

RESTATEMENT OF NRC CONCERN:

The staff requests that you provide additional discussion on the inter-relationship between the staffing of the NRB chairmanship, the improved performance of the NRB and your efforts to continue to improve overall station performance.

PECO RESPONSE:

We acknowledge the significant effect of the NRB Chairman on the overall performance of the NRB. However, we consider this effect to be primarily a result of the qualifications and attributes of the individual selected as Chairman, rather than whether the position is full-time or part-time. We do not expect the change from a full-time to a part-time Chairman to adversely effect the improved performance of the NRB or our efforts to continue to improve overall station performance.

RESTATEMENT OF NRC CONCERN:

Of particular interest to the staff, is how the duties associated with the selected individual's other corporate positions will affect their ability to serve as an effective NRB Chairman.

PECO RESPONSE:

This issue was carefully considered in the decision to make the NRB Chairman a part-time position, both from an objectivity perspective and from a time resource perspective. In neither respect was the change considered to have a negative impact on the effectiveness of the NRB Chairman.

Concerning the issue of objectivity, currently all PECO NRB members hold other corporate positions. These positions involve managing organizations within the purview of NRB oversight. Our experience has shown that the objectivity of these members has not been compromised when an issue involving a particular member's organization becomes a topic of NRB discussion. However, if a conflict of interest situation involving the NRB Chairman were to arise; we would expect the effect to be no greater than that of a situation involving any other PECO NRB member. This expectation is based on the Chairman's not having any specified veto power over the other members and that NRB decisions and recommendations should be made unanimously. In the event a unanimous decision cannot be reached, resolution is elevated to the Senior Vice President-Nuclear.

knowledge, expertise and management skills. Since we will continue to use high qualification standards when selecting individuals for this position, we consider the proposal to be consistent with the fundamental objectives of the position.

RESTATEMENT OF NRC CONCERN:

- (2) Your views on the reasons for having originally staffed the Shift Manager position with degreed engineers.

PECO RESPONSE:

When the Shift Manager position was established, we did not have a sufficient number of qualified Shift Supervisors to fill the newly created positions, and we wanted to make a significant break from past practices. Filling the position initially with degreed individuals who had not been in shift operations was one way of breaking quickly from the past. This allowed us to formulate the long-term plan for Shift Manager staffing.

RESTATEMENT OF NRC CONCERN:

- (3) Your plans and rationale for maintaining a mix of degreed and non-degreed Shift Managers.

PECO RESPONSE:

Our goal is to have the strongest possible operating crews by maintaining a mix of degreed and non-degreed Shift Managers and Shift Supervisors. This approach will give us a mix of personnel with onshift operating experience and personnel with advanced degrees at both the Shift Manager and the Shift Supervisor positions. We believe that this goal is in accordance with the NRC Policy Statement on Education for Senior Reactor Operators and Shift Supervisors at Nuclear Power Plants, dated August 15, 1989.

RESTATEMENT OF NRC CONCERNS:

- (4) A discussion of how the proposal affects the career opportunities open to the non-degreed Shift Manager.

PECO RESPONSE:

The experience gained as an onshift Operations supervisor is highly valued within the PECO Nuclear Group. This is evidenced by the demand for and the continued success of many of our former PBAPS Shift Supervisors and former LGS Shift Managers. Neither of these two positions requires a degree. Therefore, we expect promising career opportunities for the non-degreed PBAPS Shift Managers. We do not expect the non-degreed Shift Managers to be "locked in" to shift work because of not being qualified for further advancement or transfer.

Additionally, we expect the career opportunities of the Shift Supervisor, the Operations position directly below the Shift Manager, to be enhanced by removing the requirement for the Shift Manager to hold a

degree. This enhancement is expected because removing the degree requirement will make available another position within the Operations organization to which they can aspire. Temporary assignment of Shift Supervisors to other organizations enhances the Shift Supervisors' understanding of concerns and priorities of different support organizations and prepares them for higher management positions.

RESTATEMENT OF NRC CONCERN:

(5) The acceptance of this approach by the Peach Bottom staff.

PECO RESPONSE:

Based on observations made by Plant and Operations management, and discussions with affected personnel, the plan to delete the requirement that the Shift Manager must hold a degree is favorable to the PBAPS staff.

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