



## PHILADELPHIA ELECTRIC COMPANY

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OCT 25 1983

V. S. BOYER  
SR. VICE PRESIDENT  
NUCLEAR POWER

Mr. A. Schwencer, Chief  
Licensing Branch No. 2  
Division of Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Docket Nos. 50-352  
50-353

Subject: Schedule for Implementing Supplement 1 to  
NUREG-0737

References: (1) Letter from V. S. Boyer to D. B. Eisenhut  
dated April 15, 1983  
(2) Letter from A. Schwencer to E. G. Bauer, Jr.,  
dated September 26, 1983

File: GOVT 1-1 (NRC)

Dear Mr. Schwencer:

The reference (2) letter transmitted a schedule for meeting emergency response capability requirements at Limerick. Some of the scheduled dates do not agree with our current program and are addressed in the five initiatives below:

1. Safety Parameter Display System (SPDS).

A date of February 1, 1984 for SPDS operational with operators trained is not feasible. The Limerick SPDS will be operational by February 29, 1984. Training of operators after SPDS is operational will require a 60 day period; therefore, operators will be trained by May 1, 1984.

2. Detailed Control Room Design Review

The Limerick Control Room Design Review summary report will be submitted by May 21, 1984 consistent with the staff schedule.

3. Application of Regulatory Guide 1.97 to Emergency Response Facilities

Six weeks is sufficient time to revise the design description that is being reviewed by the NRC staff should the staff require additional information. The schedule reports that staff comments will be provided by December 15, 1983; therefore, a revised design description, if required, can be provided by February 1, 1984.

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4. Upgrade Emergency Operating Procedures

Our reference (1) letter provided our response and schedule to providing a procedures generation package. We are continuing to work to that schedule which is different from the staff schedule. The following information is responsive to the requested contents of the procedures generation package:

- I. Verified plant-specific data (setpoints, limits, curves, etc.) will be incorporated into the TRIP procedures and into the training program at least 9 months prior to fuel load (December, 1983).
- II. An administrative procedure will be developed to provide guidance for writing new TRIP procedures and for revising existing TRIP procedures. This administrative procedure will be available for review by November, 1983.
- III. The adequacy of existing TRIP procedures, as well as future revisions to those procedures and new procedures, is demonstrated in the following manner. A review is performed to assure that there is correspondence between the procedures and the control room hardware. Further assurance is obtained by exercising the procedures on the Limerick simulator.
- IV. The licensed operator training program for Limerick has been in operation since December, 1979. The TRIP procedures have been a part of that program since March, 1982.

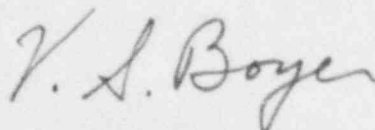
5. Emergency Response Facilities

The Limerick Emergency Response Facilities will be operational by February 29, 1984 which is different from the staff schedule.

The schedule in the reference (2) letter also included some overall schedule information which is not consistent with our current construction program. Please note that our construction schedule for Limerick Unit 1 will permit fuel loading by August 1, 1984. There is also a possibility that this schedule can be accelerated. We have recently rescheduled the full scale emergency preparedness exercise to July 25, 1984.

We will be pleased to review the above schedule with the NRC Limerick Project Manager.

Sincerely,



cc: Judge Lawrence Brenner  
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