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NUCLEAR ENGINEERING & SERVICES DEPARTMENT

October 18, 1991

Docket Nos. 50-352 55-61455
50-353 55-61456
50-277 55-61457
50-278 55-61459
55-61452 55-61461
55-61453
55-61454

License Nos. NPF-39 SOP-10935
NPF-85 SOP-10934
DPR-44 SOP-10933
DPR-56 SOP-10932
SOP-10938 SOP-10930
SOP-10937
SOP-10936

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: Limerick Generating Station, Units 1 and 2
Peach Bottom Atomic Power Station, Units 2 and 3
Submittal of the Proposed Requalification Program
Plan for Licensed Senior Reactor Operators Limited
to Fuel Handling, and a Request for Exemption from
10CFR55.59(a)(2) and 10CFR55.59(c)(4)(i) Related to
Annual Operating Tests for These Operators

Dear Dr. Murley:

We are submitting this letter to provide the attached proposed requalification training program plan for licensed Senior Reactor Operators limited to fuel handling, i.e., Limited Senior Reactor Operators (LSROs), along with associated requests for exemption, in accordance with 10CFR55.11, from the requirements of 10CFR55.59(a)(2) and 10CFR55.59(c)(4)(i) related to annual requalification operating tests for the LSROs. The individual LSRO licensees are identified below.

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<u>Name</u>	<u>Docket Number</u>	<u>License Number</u>
Berry, Patrick J.	55-61452	SOP-10938
Fuehrer, Mark D.	55-61453	SOP-10937
Johnston, Gordon L.	55-61454	SOP-10936
Levenite, Arthur E.	55-61455	SOP-10935
Nunn, Nick H. III	55-61456	SOP-10934
Oliver, Bradley S.	55-61457	SOP-10933
Risteter, Joel A.	55-61459	SOP-10932
Stott, Joseph R.	55-61461	SOP-10930

The proposed LSRO requalification training program plan provides a description of the proposed requalification training program for LSROs which is based on a systems approach to training, and is consistent with our accredited requalification training program for Senior Reactor Operators and Reactor Operators. The associated exemption requests concern (1) a one-time schedular exemption to conduct the first annual requalification operating test for the current multi-site licensed LSROs in January 1992 instead of the end of 1991, and (2) conducting the annual requalification operating tests for multi-site licensed LSROs at alternating sites, i.e., one year at Limerick Generating Station (LGS), the next year at Peach Bottom Atomic Power Station (PBAPS), and so on instead of an annual requalification operating test at each site (i.e., LGS and PBAPS) each year. The proposed LSRO requalification training program, including the training program content and these associated exemption requests, was discussed with NRC representatives in a meeting at the NRC Region I office on May 22, 1991.

Exemption Requests

We have implemented a new LSRO program that established LSROs with a multi-site license applicable at LGS, Units 1 and 2, and PBAPS, Units 2 and 3. The objective of the LSRO program is to maintain a small group of licensed personnel to supervise core alterations (i.e., reactor refueling and in-vessel maintenance activities) during refueling outages at each of the four LGS and PBAPS nuclear units. There are currently eight (8) LSROs who hold an active multi-site SRO license limited to fuel handling. The LSROs were initially licensed at LGS, Units 1 and 2, on September 10, 1990. The licenses were amended on January 9, 1991, to include PBAPS, Units 2 and 3, based on successful

completion of training on the differences between LGS and PBAPS, and written and operating examinations on these differences.

10CFR55.53(h) stipulates that a licensee, as a condition of the license, shall complete a requalification program as described by 10CFR55.59. 10CFR55.59(c)(4)(i) stipulates that the requalification program must include annual operating tests, and 10CFR55.59(a)(2) stipulates that each licensee shall pass an annual operating test.

NRC Generic Letter (GL) No. 89-03, "Operator Licensing National Examination Schedule," issued March 24, 1989, specified two examination months for each facility during which operator licensing examinations would be conducted each year. The purpose of the national examination schedule is to provide a consistent time period for conducting the examinations at each facility so that the facility can establish a standard schedule for conducting the required licensed operator training, and so that the NRC can schedule the resources required for conducting the examinations. The national examination schedule months for LGS, Units 1 and 2, are January and July. Therefore, we request a one-time schedular exemption from the requirements of 10CFR55.59(a)(2) with regard to each individual licensed LSRO to conduct the first annual requalification operating test for the multi-site licensed LSROs in January 1992 in conformance with the national examination schedule for LGS instead of the end of 1991.

Additionally, each LSRO's license is applicable to both LGS and PBAPS, i.e., two sites with units of a common vendor. The refueling equipment, support systems, Technical Specifications (TS), and plant procedures are similar for each site. Therefore, we also request an exemption from the requirements of 10CFR55.59(c)(4)(i) regarding the requalification program such that the first annual requalification operating test for the LSROs be conducted at LGS, Units 1 and 2, only, and that all subsequent annual requalification operating tests for multi-site licensed LSROs be conducted at alternating sites, i.e., the next annual operating test would be conducted at PBAPS, the following annual operating test would be conducted at LGS, and so on.

The justification for these exemption requests is provided below in accordance with 10CFR55.11. In addition, information is provided in accordance with 10CFR51.30 which supports the conclusion that the approval of these exemption requests would not have an effect on the environment.

Justification for the Exemption

Under 10CFR55.11, the NRC may grant exemptions from the requirements of 10CFR55 which are authorized by law and will not endanger life or property, and are otherwise in the public interest.

We are requesting exemptions from the requirements of 10CFR55.59(c)(4)(i) and 10CFR55.59(a)(2) which stipulate that the requalification program must include an annual operating test, and that a licensee must pass an annual operating test in order to perform licensed duties. The Philadelphia Electric Company (PECo) annual requalification operating test is based on job performance measures (JPMs) which, for LSROs, are designed to demonstrate their knowledge of refueling equipment and systems, their ability to execute normal, abnormal, and emergency procedures associated with fuel handling, and their ability to supervise the operation of equipment and systems to safely handle irradiated fuel. The purpose of the 10CFR55.59 annual operating test requirements for LSROs is to determine whether retraining is needed to upgrade the LSRO's knowledge and abilities in the areas described above.

Currently, there is no NRC guidance regarding the administration of LSRO requalification examinations. As indicated in the proposed program plan, and discussed with the NRC during the meeting on May 22, 1991, the LSRO requalification training program at PECO consists of at least 40 hours of plant specific training prior to each refueling outage at LGS and PBAPS, with a minimum of two training cycles per year (i.e., one cycle at each site per year). Each training cycle includes in-plant JPM training, and each participant is required to successfully pass an examination at the end of each training cycle which includes JPM evaluations. If an LSRO fails this examination, the individual will be removed from licensed duties until remediated and successfully re-examined. Therefore, the LSRO's operating skills and abilities are determined at the end of each requalification training cycle through the JPM evaluations. The LSROs have successfully completed requalification training and passed the associated examinations in March 1991 for LGS and in September 1991 for PBAPS. Additionally, the LSROs' licenses were amended to include PBAPS, Units 2 and 3, in January 1991 based on successfully passing the initial operating test at PBAPS in December 1990.

A January 1992 annual operating test would be within one year from when the LSRO licenses were amended, and the LSROs' operating skills and abilities have been evaluated twice within that one year period during the requalification training cycles identified above. Therefore, conducting a January 1992 annual requalification operating test for the current LSROs meets the underlying purpose of 10CFR55.59(a)(2). Also, because the units at LGS and PBAPS are of a common vendor, and the refueling equipment, support systems, TS, and plant procedures are similar for each site, and because the operating skills and abilities of the LSROs are evaluated at the end of each of the two requalification training cycles each year (i.e., one cycle per site per year), conducting the annual requalification operating test at alternating sites for multi-site licensed LSROs meets the underlying purpose of 10CFR55.59(c)(4)(i).

Environmental Assessment

Environmental Impact of the Proposed Action

Approving these exemption requests will not impact the environment since it does not involve the release of radioactive effluents.

Alternative to the Proposed Action

The previous section provides the basis for concluding that there are no environmental effects which would result from the approval of the requested exemptions. Accordingly, any alternatives with any environmental impact other than not approving these exemption requests, need not be evaluated.

Alternate Use of Resources

These exemption requests, if granted, do not involve the use of any resources not previously considered in the Final Environmental Impact Statements for the LGS and PBAPS facilities.


Proposed Finding of No Significant Impact

Based upon the foregoing environmental assessment, we conclude that the approval of our exemption requests will not have an effect on the quality of the human environment.

Due to scheduling constraints, we request a response from the NRC on these exemption requests by December 1, 1991 so that, if the exemptions are not granted, we have sufficient time to pursue alternate plans for conducting the first annual requalification operating test for the multisite licensed LSROs by the end of 1991 to avoid non-compliance with the requirements of 10CFR55.59.

If you have any questions, please do not hesitate to contact us.

Very truly yours,



G. J. Beck, Manager
Licensing Section

Attachment

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

Attachment

Limerick Generating Station, Units 1 and 2

Docket Nos. 50-352
50-353

Peach Bottom Atomic Power Station, Units 2 and 3

Docket Nos. 50-277
50-278

Limited Senior Reactor Operator
Requalification Program Plan

PHILADELPHIA ELECTRIC COMPANY

LIMITED SENIOR REACTOR OPERATOR REQUALIFICATION PROGRAM PLAN

- 1.0 PROGRAM TITLE: Limited Senior Reactor Operator
Requalification Training Program
- 2.0 PREREQUISITES: Hold a Senior Reactor Operator limited to
fuel handling license.
- 3.0 SCOPE AND DESCRIPTION:
- 3.1 Limited Senior Reactor Operator (LSRO) tasks requiring
retraining are identified on the LSRO site specific
Cross Reference Matrix.
- 3.2 LSRO requalification training consists of classroom
instruction and in-plant tours necessary to maintain
required LSRO knowledge and skills, and also to keep the
LSRO cognizant of plant physical and procedural changes,
lessons learned from industry and in-house events, and
areas determined by site management to be deficient
through operating experience or quality assurance
findings.
- 3.2.1 To maintain the knowledge and skills of the LSRO
current, the following training will be
provided.
- o Systems
 - o Procedures (normal, abnormal, and emergency)
 - o Technical Specifications
(appropriate for topics selected)
 - o Plant modifications related to the refueling
floor
 - o Related refueling operational events
- 3.2.2 Attendance and participation in the LSRO
requalification training program is required.
This includes classroom instruction, in-plant
job performance measure (JPM) training, cycle
examinations, and required reading. Failure to
attend requalification training will result in
the individual being removed from licensed
duties until the individual has completed this
training requirement.

- 3.2.3 Following each LSRO requalification training cycle, each LSRO will be required to satisfactorily pass an end of cycle examination. This examination will consist of a written section and a JPM evaluation.
- 3.2.4 Annually, each LSRO will be required to take and successfully pass an operating examination. This examination will consist of LSRO JPMs.
- 3.2.5 Biennially, each LSRO will be required to take and successfully pass a comprehensive LSRO written examination.

4.0 CONTENT/DURATION:

- 4.1 Prior to a refuel outage at either site, a LSRO requalification training cycle shall be conducted. Each cycle will consist of, at least, 40 hours of plant specific training. This training will consist of:
 - 26 to 28 hours of classroom instruction,
 - 4 to 6 hours of in-plant JPM training, and
 - 8 hours for written examination and JPM evaluation.
- 4.2 As a minimum, two (2) cycles of LSRO requalification training shall be conducted each year; one cycle per site per year.

5.0 EXAMINATION CRITERIA:

- 5.1 Passing criteria for the LSRO requalification training cycle examination, the annual LSRO operating examination, or the biennial comprehensive LSRO written examination is an overall grade of 80% or greater.
- 5.2 Failure to pass either the LSRO requalification training cycle examination, the annual LSRO operating examination, or the biennial comprehensive LSRO written examination will result in the LSRO being removed from licensed duties until remediated and successfully re-examined.