

BEFORE THE

UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of :
PHILADELPHIA ELECTRIC COMPANY : Docket Nos. 50-277
: 50-278

APPLICATION FOR AMENDMENT
OF
FACILITY OPERATING LICENSES
DPR-44 & DPR-56
AND
AMENDMENT TO MAY 23, 1980
APPLICATION

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Philadelphia Electric Company, Licensee under Facility Operating Licenses DPR-44 and DPR-56 for Peach Bottom Units 2 and 3, hereby requests that the Technical Specifications contained in Appendices A and B of the Operating Licenses be amended by revising certain sections as indicated by a vertical bar in the margin of attached pages 246, 247, 248, 249, 250, 251, 252 and 253 of Appendix A, and pages 49 and 50 of Appendix B. Additionally, Licensee amends its Application of May 23, 1980, subsequently amended August 1, 1980, June 2, 1981, and April 4, 1983, as indicated by a vertical bar in the margin of attached

pages 244 and 53 contained in Appendices A and B of the Technical Specifications, respectively.

The changes to the Technical Specifications are being requested to: (1) change the title of the off-site safety review organization from "Operation and Safety Review Committee" to "Nuclear Review Board", (2) designate the "Superintendent, Nuclear Services" as the alternate to the "Superintendent, Nuclear Generation Division" in lieu of the "Superintendent, Fossil-Hydro Generation Division," (3) change the title of "Superintendent, Generation Division - Nuclear" to "Superintendent - Nuclear Generation Division", (4) add the Engineer - Outage Manager to the composition of the Plant Operations Review Committee, (5) revise the management organization chart to reflect the formation of a new position of Manager, Nuclear Production, and (6) redefine the reporting schedule for the off-site safety review committee and Safety Limit Violation Report. A discussion of each of the proposed changes follows.

(1) Philadelphia Electric Company has formed a joint committee to handle the present duties of the Peach Bottom Operation and Safety Review Committee and the duties of a committee to handle the operational and safety review responsibilities at the Limerick Generating Station. This has been accomplished by the creation of a new review organization with the title of "Nuclear Review Board". A majority of the members of the Operation and Safety Review Committee are members of the Nuclear Review Board

in order to utilize their experience and expertise at both Peach Bottom Atomic Power Station and Limerick Generating Station. The formation of the Nuclear Review Board eliminates the need for two separate operation and safety review committees and therefore permits a uniform approach to nuclear plant safety, and simplifies administration of these organizations. The Board will perform the safety review functions for Peach Bottom without changing the current functions of the Operation and Safety Review Committee as described in the Technical Specification.

Accordingly, Licensee requests that the title of the off-site safety review organization be changed from "Operation and Safety Review Committee" to "Nuclear Review Board" as shown on attached pages 247, 248, 249, 250, 251, 252 and 253 of Appendix A to the Technical Specifications and pages 49 and 50 of Appendix B to the Technical Specifications. A Safety Evaluation, pursuant to 10 CFR 50.59a, for the creation of the Nuclear Review Board, concluded that no unreviewed safety questions are involved. The proposed change to the Technical Specifications represents a change in nomenclature only.

(2) Licensee proposes a revision to pages 248 and 253 of Appendix A, and to page 49 of Appendix B of the Technical Specifications that would designate the "Superintendent, Nuclear Services," as the alternate to the "Superintendent, Nuclear Generation Division," in lieu of the current alternate, "Superintendent, Fossil-Hydro Generation Division". The position of "Superintendent, Nuclear Services," was created as a result of

recent organizational changes to Licensee's organization separating the Generation Division into separate Fossil/Hydro and Nuclear groups, and the formation of a Nuclear Services group. Revisions to the organization charts in the Technical Specifications to reflect these organizational changes were proposed in an Amendment Application dated April 4, 1983; however, the assignment of responsibilities to the new organization was not addressed in that application.

The new Nuclear Services organization is described on pages 13.1-2 and 13.1-3, and shown on Figure 13.1-1 of the Limerick Generating Station Final Safety Analysis Report which are incorporated herein by reference. The Superintendent, Nuclear Services, is responsible for the activities of the Licensing Section, Nuclear Safety Section, Nuclear Training Section, Radiation Protection Section, Fuel Management Section and Emergency Preparedness Section; and reports to the Superintendent, Nuclear Generation Division. The individual presently filling this position has been directly involved in Philadelphia Electric Company's nuclear engineering activities since 1957. The qualifications of this individual are presented on Table 13.1-4, Page 8, Rev. 25, October 1983, of the Limerick Generating Station Final Safety Analysis Report which is incorporated herein by reference.

The assignment of responsibilities, as described in the Technical Specifications, to the Superintendent, Nuclear Services, would enhance the effectiveness of the Nuclear

Generation Division in responding to safety issues due to his expertise and familiarity with the Peach Bottom Atomic Power Station.

(3) Licensee requests that the title of "Superintendent, Generation Division - Nuclear" be changed to "Superintendent - Nuclear Generation Division" as shown on attached pages 247, 248 and 253 of Appendix A to the Technical Specifications, and pages 49 and 50 of Appendix B to the Technical Specifications. The proposed change represents a change in nomenclature only.

(4) Licensee proposes the addition of the Engineer - Outage Manager to the Plant Operation Review Committee (PORC) as shown on page 246 of the Technical Specifications. The position was established to provide overall direction and continuity for the planning and execution of refueling outages. The individual presently filling this position is a senior member of the Peach Bottom operating staff and possesses a Senior Reactor Operators license. The assignment of the Engineer - Outage Manager to the PORC will enhance the expertise and review capability of the committee.

(5) By Amendment Application dated May 23, 1980, Licensee requested revisions to the Technical Specifications contained in Appendices A and B to the Licensees relating to Licensee's management organization for nuclear activities. By letters dated August 1, 1980, June 2, 1981, and April 4, 1983, Licensee amended the application. As a result of recent organization changes splitting the position of Manager - Electric Production into

separate positions of Manager - Fossil-Hydro Production, and Manager - Nuclear Production, Licensee hereby revised its Application of May 23, 1980, as revised August 1, 1980, June 2, 1981, and April 4, 1983 by:

- a) Deleting from the application proposed Figure 6.2-1 of Appendix A to the Operating Licenses and substituting therefor the proposed revised Figure 6.2-1, and
- b) Deleting from the Application proposed Figure 7.1-1 of Appendix B to the Operating Licenses and substituting therefor the proposed revised Figure 7.1-1.

The responsibilities of the Manager - Nuclear Production will be dedicated to the operation of the Company's nuclear facilities. In this manner, it will better focus management attention on the Company's nuclear activities, consequently providing more effective management control. The individual assigned to this position is the former Superintendent, Nuclear Generation Division, and possesses approximately twenty-five years of supervisory and managerial experience in the operation of nuclear facilities.

Additionally, the proposed revised Figures 6.2-1 and 7.1-1 incorporate the off-site review organization (Nuclear Review Board) previously discussed.

(5) The proposed revision to the reporting period for Nuclear Review Board reports and Safety Limit Violation Reports on pages

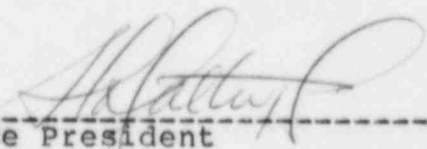
252 and 253 changes "14 days" to "10 working days". This change would establish consistency with the reporting requirements in Section 6.9.2 of the Peach Bottom Technical Specifications, recognize the inherent delays resulting from Company vacations, and reflects the intent of the 14-day reporting requirement.

These proposed revisions to the Technical Specification are purely administrative in nature since they constitute a change in the nomenclature of the off-site safety review committee, an addition to the composition of the on-site safety review committee, a change in title, a personnel change associated with the reorganization of the Nuclear Generation Division, and the addition of a new management position dedicated to nuclear activities. Pursuant to the provisions of 10 CFR 50.92, the proposed revisions do not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, or (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety, and therefore do not involve a significant hazards consideration.

Pursuant to 10 CFR Section 170.22, "Schedule of Fees for Facility License Amendments", Philadelphia Electric Company proposes that this Application for Amendment be considered a Class II Amendment for Unit 2 and a Class I Amendment for Unit 3, since the proposed changes are administrative in nature and have no safety or environmental significance.

The Plant Operation and Review Committee and the Operation and Safety Review Committee (Nuclear Review Board) have reviewed these proposed changes to the Technical Specifications, and have concluded that they do not involve an unreviewed safety question or a significant hazard consideration and will not endanger the health and safety of the public.

Respectfully submitted,
PHILADELPHIA ELECTRIC COMPANY



Vice President

COMMONWEALTH OF PENNSYLVANIA :
 : SS.
COUNTY OF PHILADELPHIA :

S. L. Daltroff, being first duly sworn, deposes and says:

That he is Vice President of Philadelphia Electric Company, the Applicant herein; that he has read the foregoing Application for Amendment of Facility Operating Licenses and knows the contents thereof; and that the statements and matters set forth therein are true and correct to the best of his knowledge, information and belief.

S. L. Daltroff

Subscribed and sworn to
before me this 29th day
of May 1984

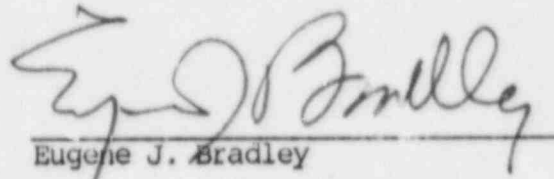
Patricia D. Scholl

Notary Public

PATRICIA D. SCHOLL
Notary Public, Philadelphia, Philadelphia Co.
My Commission Expires February 10, 1986

CERTIFICATE OF SERVICE

I certify that service of the foregoing Amendment was made upon the Commonwealth of Pennsylvania, by mailing a copy thereof, via first-class mail, to Thomas R. Gerusky, Director, Bureau of Radiological Protection, P. O. Box 2063, Harrisburg, PA 17120, all this 29th day of May, 1984.



Eugene J. Bradley

Attorney for
Philadelphia Electric Company