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AUG 30 1984

JOHN S. KEMPER
VICE-PRESIDENT
ENGINEERING AND RESEARCH

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: Limerick Generating Station, Units 1 and 2
Additional Information for Licensee Qualification
Branch

Reference: 1) Telecon between NRC, Bob Benedict, and PECO,
Dave Honan, on May 9, 1984.
2) Telecon between NRC, Bob Benedict, and PECO
on August 24, 1984.

Attachment: Draft FSAR Page Changes

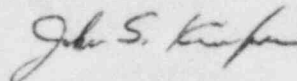
File: GOVT 1-1 (NRC)

Dear Mr. Schwencer:

The reference 1) telecon requested additional information on PECO's policy regarding periodic review of administrative procedures. Pursuant to the reference 2) telecon, this information is provided in the attached draft FSAR page changes and will be incorporated into the FSAR revision scheduled for October, 1984.

If you require any additional information, please do not hesitate to contact us.

Sincerely,



RDC/gra/08298405

cc: See Attached Service List

8409060267 840830
PDR ADOCK 05000352
A PDR

Boo1
1/1

cc: Judge Lawrence Brenner (w/o enclosure)
Judge Peter A. Morris (w/o enclosure)
Judge Richard F. Cole (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)
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Charles W. Elliot, Esq. (w/o enclosure)
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Director, Penna. Emergency (w/o enclosure)
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Atomic Safety & Licensing (w/o enclosure)
Appeal Board
Atomic Safety & Licensing (w/o enclosure)
Board Panel
Docket & Service Section (w/o enclosure)
Mr. James Wiggins (w/o enclosure)
Mr. Timothy R. S. Campbell (w/o enclosure)

DRAFT

Insert attached

LGS FSAR

13.5 PLANT PROCEDURES

Safety-related activities performed by the plant staff shall be governed by written and approved procedures of a type appropriate to the circumstances and activity, and shall be carried out in accordance with those procedures. Where appropriate for determining that important activities have been satisfactorily accomplished, quantitative or qualitative acceptance criteria shall be included. The Philadelphia Electric Company (PECo) utilizes the operating experience gained at Peach Bottom Atomic Power Station - Units 2 & 3 (boiling-water reactor (BWR) units similar to Limerick Generating Station) in the development of the procedures.

As fully described below, PECo has implemented ANSI N18.7 - 1976/ANS 3.2, Section 5 as modified by Nuclear Regulatory Commission (NRC) Regulatory Guide 1.33 (Rev 2), paragraphs C.1 and C.5.b through C.5.j, as these documents apply to operating staff activities, in the preparation, content, and control of procedures.

It is planned that most administrative and operating procedures will be in effect at least six months prior to fuel loading of Unit 1. The procedures will be implemented with sufficient lead time to ensure that operating personnel can become familiar with them. PECo recognizes the benefits of using the preoperational testing phase to demonstrate the adequacy of operating procedures and, where practicable, this will be accomplished.

The following paragraphs describe the types of procedures to be employed by station operating personnel in the conduct of safety-related activities. These procedures are normally prepared by the station operating staff. However, organizations providing technical support and consultants may assist in procedure development. The procedures and revisions thereto are reviewed by the Plant Operations Review Committee (PORC), or by a subcommittee appointed by PORC, and are approved by the Station Superintendent or Assistant Station Superintendent prior to use.

13.5.1 ADMINISTRATIVE PROCEDURES

Administrative procedures generally include those that establish station management policy, those that control activities that involve interfaces among disciplines or groups supporting plant operations, and those that establish criteria for procedures and activities implemented by the plant staff and support organizations. Administrative procedures shall be prepared in sufficient detail so that tasks are performed in a consistent, efficient manner and to ensure that the necessary reviews and approvals are performed.

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Although ANSI N18.7-1976/ANS 3.2 recommends procedure review no less frequently than every two years maintenance and preventive maintenance procedures, administrative procedures, surveillance test procedures, and health physics procedures are reviewed at a specified frequency of no less than five years. This review frequency is adequate because, in addition to the specified frequency, programs are in effect to revise procedures

when regulatory changes occur or company policies change, or when the plant modification procedure or the design change package implementation program identify necessary changes in procedures as part of those programs. The frequency of use further justifies the five year review of procedures, i.e., some procedures are used routinely and the proper performance of the task in accordance with the procedure proves the procedure is correct.