



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NOS. 167 AND 171 TO FACILITY OPERATING

LICENSE NOS. DPR-44 and DPR-56

PHILADELPHIA ELECTRIC COMPANY
PUBLIC SERVICE ELECTRIC AND GAS COMPANY
DELMARVA POWER AND LIGHT COMPANY
ATLANTIC CITY ELECTRIC COMPANY

PEACH BOT" ATOMIC POWER STATION, UNIT NOS. 2 AND 3

DOCKET NOS. 50-277 AND 50-278

1.0 INTRODUCTION

By letter dated July 13, 1990, and supplemented by letters dated November 27, 1991, and February 21, 1992, the Philadelphia Electric Company, Public Service Electric & Gas Company, Delmarva Power and Light Company and Atlantic City Electric Company (the licensees) submitted a request for changes to the Peach Bottom Atomic Power Station, Unit Nos. 2 and 3, Technical Specifications (TS). These proposed amendments would change the Administrative Controls section (Section 6.0) of the TS, including the addition of a new TS Section 6.5.3, to reflect the implementation of a Station Qualified Reviewer (SQR) Program for review and approval of new station programs, procedures, and changes thereto. The SQR Program is a program/procedural review and approval process using qualified reviewers to perform a review and designated Superintendents for approval of new programs, procedures, and changes thereto. This program has been approved by the NRC for a number of facilities, including the Public Service Electric and Gas (PSE&G) Company facilities and the Limerick Generating Station, which is also operated by Philadelphia Electric Company (PECo). The supplemental letters did not change the initial proposed no significant hazards consideration determination.

2.0 EVALUATION

The purpose for establishing the SQR Program is to shift more responsibility for safety reviews to the line organizations and to alter the scope of Plant Operations Review Committee (PORC) reviews to be more appropriate for that of a safety oversight committee. In lieu of the PORC reviewing every new procedure and every procedure change, PORC will review those that require a 10 CFR 50.59 Safety Evaluation and any Administrative procedure or change thereto. An SQR and a station Superintendent or Manager will review each new procedure and procedure change. Rather than the Plant Manager approving every new procedure and every procedure change, appropriate station Superintendents or Managers will approve those that do not require a 10 CFR 50.59 Safety Evaluation. An SQR, rather than PORC, will review temporary procedure changes

after implementation, and appropriate Superintendents or Managers will be permitted to approve temporary procedure changes after implementation, rather than only the Plant Manager being permitted to approve them. The Plant Manager will continue to approve Administrative procedures, Security Plan implementing procedures and Emergency Plan implementing procedures.

Section 13.5.1 (Administrative Procedures) of the Standard Review Plan (SRP) requires that the staff determine that "the applicant has described the program and procedures that provide administrative controls over activities important to safety. These include the activities of the preparation, review, and approval of plant operating and maintenance procedures," For Peach Bottom, PECO had proposed in Section 13.8.2 of the Final Safety Analysis Report (FSAR) that the Plant Operations Review Committee (PORC), among many other responsibilities, review all procedures required by TS 6.8 and changes thereto and to recommend, in writing, to the Plant Manager, for his approval or disapproval, the Committee's evaluation of the proposed procedure. Section 6.8.2 of the present TSs requires that each procedure and administrative policy, and changes thereto, shall be reviewed by the PORC and approved by the Plant Manager or his designated alternate, prior to implementation. Furthermore, Section 6.8.2 also requires that these procedures be reviewed periodically.

At Peach Bottom there are in the order of 8000 procedures covering everything from operations, maintenance, security, emergency preparedness, fire protection, procurement, etc. During initial operation, when many new procedures were being developed, the applicant's proposal to have procedures reviewed by PORC was an acceptable means of providing administrative controls over activities important to safety (SRP 13.5.1). The major workload now is not development of new procedures but the TS requirement (per R.G. 1.33) to periodically review all procedures and improvements to procedures indicated by plant experience. The present requirement to have PORC review all procedures and programs has worked satisfactorily. There have been no significant regulatory concerns identified with PORC's review of programs and procedures. Since the present system is working - from a regulatory standpoint - the staff assessed the disadvantages of the present arrangement as part of our assessment of whether the proposed new program (the SQR) would provide an acceptable level of control over programs and procedures.

As prescribed in Section 6.5.1 of the TSs, the Plant Operations Review Committee (PORC) functions to advise the Plant Manager on all matters related to nuclear safety. The composition of the PORC is specified in Section 6.5.1.2 of the TSs and includes the four Superintendents that report to the Plant Manager, the Assistant Superintendent-Operations, the Regulatory Engineer, the Systems Engineer, a Shift Manager and the Maintenance Engineer (9 members). This is essentially the entire senior management for plant operation of which a quorum must be present. While there are provisions for a PORC member being on vacation or in training, the TSs specify that "no more than two alternates shall participate as voting members in PORC activities at any one time."

The licensee has spelled-out in the proposed new TS Section 6.5.3 and in their submittal how the SQR Program will function. The key points of the proposed program are as follows:

- ° There will be no change in reviewing new or revised Administrative procedures, Security Plan implementing procedures and Emergency Plan implementing procedures, inasmuch as the impact of these procedures crosses several organizational boundaries. (Administrative procedures are the "highest" level of procedures.) PORC will review these procedures and recommend to the Plant Manager whether he should approve them.
- ° PORC will continue to review procedures and procedure changes that require a 10 CFR 50.59 Safety Evaluation. After considering PORC's recommendation regarding the documents, the Plant Manager approves or rejects the procedure or procedure change and associated Safety Evaluation, if one is required. Unreviewed Safety Question (USQ) determinations are governed by a Nuclear Group Administrative Procedure for 10 CFR 50.59 reviews of changes, tests and experiments, including procedure changes. This Nuclear Group Procedures, NA-02R002, Revision 0, dated November 3, 1989 applies to the entire nuclear group (i.e., corporate, licensing, Limerick and Peach Bottom). This procedure embodies the guidance in NSAC/125, "Guidelines for 10 CFR 50.59 Safety Evaluations," June 1989.
- ° The PORC Chairman approves plant personnel recommended to be Station Qualified Reviewers (SQRs) for specific types of programs and classes of procedures. The SQR will be an individual knowledgeable in the functional area affected and may be from the same organization, but who is not the individual preparer.
- ° The Plant Manager, as authorized by Administrative Procedures, appoints plant Superintendents to be responsible for approving specific types of programs and classes of procedures. The appointed Superintendent will be the individual responsible for and cognizant of the affected functional area. PECO emphasized in their application that the term "responsible Superintendent" as used in the proposed TSs is meant to identify a minimum level of management and not just a person with the specific title. At Peach Bottom, as at Limerick, there are two other Managers on the same level as the Plant Manager - the Project Manager and the Support Manager. Both are responsible for numerous procedures (fire protection, receiving, warehousing, purchasing, storage, QA, testing of the siren system, testing of emergency phones, surveillance tests of the intrusion detection equipment, etc., etc.) Both of the Managers could approve procedures under the SQR Program. The positions which PECO is proposing to designate as approving authorities under the SQR Program are the Plant Manager, the Project Manager, the Support

Manager, the Superintendent-Training, the Superintendent-Operations, the Superintendent-Technical, the Superintendent-Plant Services and the Superintendent-Maintenance/I&C.

- Each new program, procedure, or change thereto is reviewed by the designated SQR. The SQR determines when a cross-disciplinary review by other personnel is necessary prior to approval. The new program, procedure, or change thereto and accompanying 10 CFR 50.59 Review documentation (i.e., evaluation of the proposed change, new procedure or new program in accordance with 10 CFR 50.59) is reviewed by the responsible Superintendent, including a determination as to whether a 10 CFR 50.59 safety evaluation is required or not. If not, the new program, procedure, or change thereto is then approved by the responsible Superintendent or the Plant Manager. If a 10 CFR 50.59 safety evaluation is required, the entire new program, procedure, or change package, including the 10 CFR 50.59 safety evaluation, is reviewed by PORC.
- Temporary procedure changes (TPCs) will be implemented as before; however, the TPC will be reviewed by the designated SQR (including a cross-disciplinary review if necessary) and approved by the Plant Manager or responsible Superintendent, as appropriate, within 14 days of implementation.
- The SQR is not to be the person who prepared the procedure (or revision), even if serving in an acting capacity. For example, a person who is designated as acting Superintendent could not approve a procedure for which he had been the SQR.

In accordance with a 1989 agreement with the Commonwealth of Pennsylvania, PECO committed to require that members of the facility staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1981 standard "Selection, Qualification and Training of Personnel for Nuclear Power Plants". The personnel who will be approved as SQRs at Peach Bottom will be members of the facility staff and thus will be required to meet the ANSI/ANS 3.1 qualifications. With respect to the qualifications of the SQRs in Section 6.5.3, PECO had stated in the proposed TSs that the SQRs would be an individual from the responsible organization, that they would be knowledgeable in the functional area affected, that they would be recommended in writing by the appropriate Superintendent/Manager, documenting the qualifications of the proposed individual, and they would be approved by the PORC chairman. The NRC staff's position was that there should be some minimum academic/experience credentials specified for the SQRs along the lines of the qualification in Section 4.4 of ANSI/ANS-3.1-1981. Our basis for this position was that the SQR has to have the background to assess the impact of procedure revisions on plant safety, to evaluate whether a cross disciplinary review is indicated and to determine whether a 10 CFR 50.59 safety evaluation is required. From discussions with the licensee, most of the individuals they considered as potential nominees to be SQRs, such as system engineers, would likely have a background as described

in Section 4.4 ("Professional-Technical") of ANSI/ANS-3.1-1981. For most categories, this section (4.4) requires a bachelor or associate degree in engineering or related sciences along with certain nuclear power plant experience. The licensee's interpretation of "related sciences" would include degrees in disciplines such as criminology for security personnel.

The licensee advised us that in two areas, the most qualified individuals to potentially serve as SQRs did not have the academic credentials specified in Section 4.4, but did have many years of nuclear power plant experience and/or had qualified as a Senior Reactor Operator (SRO). The educational, work experience, training and other qualifications which PECO was considering for potential SQRs was the subject of several conference calls (July 30, 1991, November 15, 1991, etc.). An example of what we would not consider as adequate background would be the standard in Section 4.3.2 ("Supervisors not requiring NRC licenses) of ANSI/ANS-3.1-1981. This section only requires an individual to have a high school diploma, four years of experience in the craft or discipline and only one year of nuclear power plant experience. As a result of these discussions, by letter dated November 27, 1991, PECO submitted a revised Section 6.5.3 on page 252a of the TSs for both units. In this revised paragraph, PECO proposed that "the individual shall meet the qualifications of ANSI/ANS-3.1-1981, Selection, Qualification and Training of Personnel for Nuclear Power Plants, Section 4, excluding subsection 4.5". The staff concluded that the proposed revision was acceptable except that it did not exclude subsection 4.3.2. This was discussed with the licensee on December 13, 1991. The staff presented the basis for excluding subsection 4.3.2 because of the minimal academic and work experience standards as discussed previously. The licensee agreed with the staff's proposal to add subsection 4.3.2 as an additional exclusion in Section 6.5.3 (page 252a) of the revised TSs. This change was submitted by the licensee's letter of February 21, 1992. The licensee also advised us that although Section 4.5.12 relates to "Licensed Operators", they did not interpret this to exclude personnel qualified as SROs (but not ROs) with many years of nuclear power plant experience. The supplemental requirements which the licensee added to Section 6.5.3 of the TSs in their letters of November 27, 1991 and February 21, 1992 do not change the staff's no significant hazards consideration.

Based on our evaluation, we conclude that the proposed SQR program at Peach Bottom will provide adequate control over activities important to safety, including the preparation, revision, review and approval of programs and procedures and changes thereto. The proposed changes to the TS are acceptable.

The licensee has also proposed some minor administrative changes to the TSs. The first change is merely a format change of Specification 6.8.1 to itemize the procedures which are required to be established, implemented and maintained. Also, in order to specify all of the required procedures in one

location, the procedures currently specified in 6.8.4 have been relocated into the reformatted 6.8.1. The second change broadens the records retention requirements of Specification 6.10 to include records of changes to all of the procedures required by Specification 6.8. Currently, only records of Operating procedure changes need to be retained in accordance with Specification 6.10.1.f. Lastly, in several locations references to other Technical Specifications were clarified by stating "Specification" or "Technical Specification" before the number referenced in the text. These changes are administrative in nature, have no safety significance and are acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Pennsylvania State official was notified of the proposed issuance of the amendments. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendments relate to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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