



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NOS. 55 AND 20 TO FACILITY OPERATING  
LICENSE NOS. NPF-39 AND NPF-85  
PHILADELPHIA ELECTRIC COMPANY  
LIMERICK GENERATING STATION, UNITS 1 AND 2  
DOCKET NOS. 50-352 AND 50-353

1.0 INTRODUCTION

By letter dated May 19, 1992, the Philadelphia Electric Company (PECo or the licensee) submitted a request for changes to the Limerick Generating Station, Units 1 and 2, Technical Specifications (TS). The requested changes would revise Sections 6.3.1 and 6.4.1 of the TS to clarify the current requirements for licensed operator qualifications and training. These changes are being proposed to delete TS requirements that are superseded based on the licensed operator training programs being accredited and based on a "systems approach to training," and promulgation of the revised 10 CFR Part 55, "Operators' Licenses," which became effective on May 26, 1987.

2.0 EVALUATION

On March 20, 1985, the NRC issued "Commission Policy Statement on Training and Qualification of Nuclear Power Plant Personnel" (50 FR 11147) which endorsed the training accreditation program developed by the Institute of Nuclear Power Operations (INPO), in association with its National Academy for Nuclear Training. Subsequently, NRC Generic Letter (GL) No. 87-07, "Information Transmittal of Final Rulemaking for Revisions to Operator Licensing - 10 CFR 55 and Conforming Amendments," dated March 19, 1987, and NUREG-1262, "Answers to Questions at Public Meetings Regarding Implementation of Title 10, Code of Federal Regulations, Part 55 on Operators' Licenses," published November 1987, indicated that the NRC will accept a licensee's licensed operator training program if it is certified to be accredited and based on a "systems approach to training," and that this accreditation obviates the need to conform to Regulatory Guide (RG) 1.8, "Qualification and Training of Personnel for Nuclear Power Plants," Revision 2, dated April 1987, and Standard ANSI/ANS 3.1, "Selection, Qualification and Training of Personnel for Nuclear Power Plants." PECo, by letters dated April 27, 1990, and June 19, 1990, in response to GL 87-07, certified that the licensed operator training programs for Limerick Generating Station (LGS), Units 1 and 2, were initially accredited by INPO on October 30, 1986, and then again on January 25, 1990, and that these programs are based on a systems approach to training.

TS Section 6.3.1, "Unit Staff Qualifications," for LGS, Units 1 and 2, currently states "Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978...The licensed operators and senior operators shall also meet or exceed the minimum qualifications of the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees." Additionally, TS Section 6.4.1 "Training," for LGS, Units 1 and 2, currently states, "A retraining and replacement training program...shall meet or exceed the requirements of ANSI/ANS 3.1-1978 and 10 CFR 55 and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees..." Licensed operator qualifications and the licensed operator retraining and replacement training programs must comply with the requirements of the revised 10 CFR 55, which, as stated in NUREG-1262, supersedes the supplemental requirements specified in the March 28, 1980 NRC letter to all licensees. Also NUREG-1262 indicates that Standard ANSI/ANS 3.1 and RG 1.8, which endorses ANSI/ANS 3.1, are superseded by INPO accreditation in accordance with the revised rule, and that licensees may submit a request to the NRC for an administrative change to their TS to delete the TS requirements which have been superseded.

In accordance with the NRC guidance, the licensee has proposed the following administrative changes to Sections 6.3.1 and 6.4.1 of the TSs to clarify the current requirements for licensed operator qualifications and training:

1. Delete the requirement from TS Section 6.3.1 that licensed operators shall meet or exceed the minimum qualifications of "ANSI/ANS 3.1 1978" and "the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1990 NRC letter to all licensees."
2. Delete the requirement from TS Section 6.4.1 that the licensed operator retraining and replacement training programs "...shall meet or exceed the requirements of ANSI/ANS 3.1-1978...and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees..."

As shown in the proposed TS Sections 6.3.1 and 6.4.1, the licensed operator qualifications and training programs will continue to be required to comply with the requirements of 10 CFR 55, and the qualifications and training programs for all other affected unit staff will continue to be required to meet or exceed the standards of ANSI/ANS 3.1-1978 (except for Senior Health Physicists who will continue to be required to meet or exceed the qualifications of RG 1.8, September 1975).

We have reviewed the licensee's proposed changes to TS Sections 6.3.1 and 6.4.1 and conclude that they 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, 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.

Principal Contributors: R. Clark  
R. Pelton

Date: August 5, 1992