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January 7, 1985

Docket Nos. 50-277
50-278

Mr. John F. Stolz, Chief
Operating Reactors Branch #4
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: Peach Bottom Atomic Power Station, Units 2 and 3
Schedule Relief for Control Room
Design Review Summary Report
(NUREG-0737, Supplement 1)

Dear Mr. Stolz:

This letter requests an extension in the schedule for submitting a summary report describing control room improvements resulting from the Control Room Design Review (CRDR) Program as required by NUREG-0737, Supplement 1, "Requirements for Emergency Response Capability". By correspondence dated September 14, 1983 (J. W. Gallagher, PECO, to D. G. Eisenhut, NRC), we proposed a common CRDR program for both the Limerick and Peach Bottom plants, with the Limerick review scheduled first, followed by the Peach Bottom review. A submittal date of March 15, 1985 was proposed for the Peach Bottom summary report. The Commission issued an Order on June 14, 1984, confirming the commitments associated with NUREG-0737, Supplement 1 requirements, including the March 15, 1985 commitment. This letter requests an extension in the commitment date from March 15, 1985 to June 30, 1985.

Following substantial completion of the Limerick CRDR program, in Fall 1984, the Peach Bottom CRDR program analysis and enhancement design was initiated. A review team, along with the services of the human factors consultant that assisted in the Limerick program have been active since September, 1984. A top down analysis and design of enhancements for the control panels are 90% complete and construction of a full scale mockup is in progress. Analysis of human engineering discrepancies is also underway. Unfortunately, as is not uncommon for programs of this complexity where completion dates are established more than one year in advance, the March 15, 1985 submittal date for the Summary Report is not attainable. The need for a schedule delay

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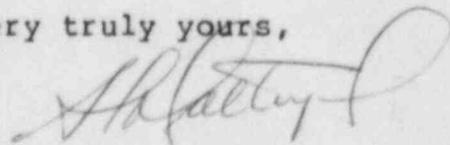
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was discussed by telephone on December 18, 1985 with the NRC Peach Bottom Project Manager and technical staff, and it was indicated that an approximately three-month delay would not be unreasonable. Factors that have contributed to this delay are as follows:

1. The overall enhancements being considered as part of the CRDR analysis involve major visual changes to the control panels of an operating facility. These modifications have the potential to disrupt the operating effectiveness of control personnel. The production of control panel designs that address human factor concerns without unduly intruding on ten years of operating experience is proving to be a more time consuming iterative task than originally thought.
2. Difficulties in obtaining agreement among all individuals involved in the review and approval process have resulted in more reassessments and meetings than originally anticipated. These difficulties are in part caused by the inclusion of a variety of disciplines to provide the best review possible.
3. Our original program plan for NUREG-0737, Supplement 1, took credit for the task analyses performed in the development of Emergency Operating Procedures. Subsequent clarification from the NRC staff during a March 4, 1984 meeting with the BWR Owners' Group CRDR Committee increased our previously estimated workload by rejecting those analyses and requiring that new ones be performed.

For the reasons discussed above, we propose a new submittal date of June 30, 1985 for the CRDR Summary Report, and request that appropriate action be taken to change the date in the Commission Order of June 14, 1984. Should you have any questions regarding this request, please do not hesitate to contact us.

Very truly yours,



cc: J. W. Williams, Resident Inspector