

BEFORE THE

UNITED STATES NUCLEAR REGULATORY COMMISSION

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

APPLICATION FOR AMENDMENT
OF
FACILITY OPERATING LICENSES

DPR-44
DPR-56

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On February 11, 1982, Philadelphia Electric Company, Licensee under Facility Operating Licenses DPR-44 and DPR-56 for the Peach Bottom Atomic Power Station Units Nos. 2 and 3, respectively, requested that portions of the Technical Specifications contained in Appendix A of the Operating Licenses be amended to incorporate certain NUREG-0737 requirements. Subsequently, the February 11, 1982 Application was amended on August 24, 1983, to, among other things, incorporate working hour restrictions for certain plant personnel. The working hour restrictions contained in the August 24, 1983 Amendment were further amended on November 1, 1985, September 30, 1986 and September 8, 1987. Licensee is hereby proposing a Technical

Specification Amendment, which supersedes in their entirety these previous Applications on working hour restrictions. Proposed Amendment to the Technical Specifications would add enclosed pages 270, 271, and 272 to the existing Technical Specifications to impose restrictions on all site personnel performing safety-related functions.

Safety Assessment

The proposed Technical Specification Amendment incorporates restrictions on working hours and strict administrative controls based on seven-day work periods for all site staff who perform safety-related functions and also based on periods of up to one calendar year for shift operators (licensed Senior Operators, licensed Operators and non-licensed operators). The proposed Amendment is provided to ensure control over excessive periods of continuous work or chronic overtime. Provisions are included for documentation of authorized exceedance of working hour restrictions to ensure that trends are identified and excessive working hours are controlled and limited. The controls are designed to minimize the probability of personnel error and improve personnel attentiveness to safety-related activities.

Provisions are included in the proposed Technical Specification which require approval by site management to exceed the work hour restrictions for staff performing safety-related functions and to exceed the first level of hourly controls for shift operators. Such approval can be granted only on an

individual basis except during extended shutdown periods to ensure that management attention is devoted to each case. Site management is defined as the employing officer level or above. The employing officer is the position with responsibility for scheduling an employee's time. Alternates to these personnel will be designated in administrative controls. These employing officers or alternates control work hour restrictions for site personnel performing safety-related functions. In addition, should approved working hours of the shift operators exceed the second level of control, the Plant Manager is required to report each approval to the Site Vice President citing the reasons for the approval and corrective actions to be taken to minimize the need for approvals.

Management control and awareness of overtime working hour status will thereby be kept at the senior level and will ensure that the need for potential corrective actions necessary to limit the amount of overtime is brought to the attention of plant management.

The computation of working hours, for the purpose of this Technical Specification, excludes shift turnover time and sick, vacation or other types of leave. However, all work activities, including training, are included as working hours.

Proposed Changes

The proposed amendment would establish a Section 6.20 entitled Site Staff Working Hour Restrictions (p. 270, 271 and

272). The first paragraph of this section (6.20.1) would establish the requirements for the administrative procedures to limit the work hours of staff who perform safety-related functions. This paragraph would state that:

"Administrative procedures shall be developed and implemented to limit the working hours of site staff who perform safety-related functions as stated in 6.20.2."

The subsequent paragraph (6.20.2) would establish the objective of the working hour restrictions by specifying those restrictions applicable to all site staff who perform safety-related functions and additional restrictions for shift operators. These work hour restrictions are based on guidance provided in NRC Generic Letter 82-16 and NUREG/CR-4248. A pay period (a unit of time used in defining shift operator work hour restrictions) is a seven-day period during which an operator's regular hours are scheduled as five 8-hour days. This paragraph would state that:

"Adequate staffing shall be maintained without undue use of overtime. The following overtime limits shall be followed:

1. An individual shall not be permitted to work more than 16 hours straight, excluding shift turnover time.

2. An individual shall not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time.
3. A break of at least 8 hours shall be allowed between work periods. The break shall include shift turnover time.
4. Except during extended shutdown periods, the use of overtime shall be considered on an individual basis.
5. Working hours do not include shift turnover time or absent time but do include all work associated activities (for example training).
6. For shift operators (i.e., licensed Senior Operators, licensed Operators, and non-licensed operators), the following working hour limits shall be followed and supersedes item number 2:

PLANT MANAGER OR ALTERNATES

<u>TIME PERIOD</u>	<u>APPROVAL REQUIRED TO EXCEED, HOURS</u>	<u>LIMIT, HOURS⁽¹⁾</u>
24 hours	16	16
48 hours	24	28
one pay period	60	84
two pay periods	112	144
four pay periods	220	264
one calendar year	2400	2500

(1) If this value is exceeded, the Plant Manager must report in writing to the Site Vice President citing the reason for exceedance and corrective actions taken.

The subsequent paragraph (6.20.3) would provide the approval authority for exceedance of work hour restrictions to ensure that the primary authority for approval of work hour exceedance is with the employing officer. Also included are provisions for establishing procedures for documentation of exceedance. Procedures will be provided such that overtime is monitored on a cumulative basis. The inclusion of the word "alternate" in lieu of the word "designee" provided in Generic Letter 82-16 will ensure that the responsibility for approving

exceedance of the working hour restrictions remains at an appropriate level of management. This paragraph would state that:

"Any exceedance of the working hour restrictions of 6.20.2 shall be authorized by the employing officer, or alternates as specified in administrative controls, for site personnel performing safety-related functions in accordance with established procedures and with documentation of the basis for granting the exceedance. Procedures will be provided such that overtime is monitored on a cumulative basis."

As a part of the proposed Technical Specification, a BASES section (p. 272) is provided which reflects the wording in the Standard Technical Specification (NUREG-0123) and NRC guidance. Additionally, "alternate" has been defined to ensure that it refers to the appropriate level of management.

Significant Hazards Consideration Determination

This Application does not reduce the requirements of the current Technical Specifications. The proposed change constitutes additional administrative controls not presently included in the Technical Specifications, and is in the interest of enhancing safe operations and complying with requirement 1.A.1.3 of NUREG-0737 and NRC guidance. The Commission has provided guidance concerning the application of the standards for determining whether license amendments involve no significant

hazards considerations by providing certain examples (51 FR 7750). One of the examples (ii) of actions involving no significant hazards consideration is a change that constitutes an additional limitation, restriction, or control not presently included in the Technical Specifications. The changes proposed by this application fit this example of an action not involving a significant hazards consideration since they incorporate the working hour restrictions and controls requested by the NRC in Generic Letter 82-16. The proposed changes to the Peach Bottom operating licenses do not constitute a significant hazards consideration in that they do not:

- i) Involve a significant increase in the probability or the consequences of an accident previously evaluated

The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated since the proposed working hour restrictions will reduce the possibility of work-induced fatigue and consequently improve attentiveness to safety-related activities in the interest of reducing the probability or consequences of an accident as evaluated in Chapter 14 of the PBAPS Updated Final Safety Analysis Report. These changes also reflect the organizational changes recently approved by the NRC (License Amendment Nos. 132 and 135) which will

ensure that the primary authority for approval of working hour exceedance is with the appropriate level of site management. Thus, management control and awareness of the overtime work status will be elevated thereby ensuring that control of working hours for personnel involved with safety-related activities is maintained.

- ii) Create the possibility of a new or different kind of accident from any accident previously evaluated

The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated because they increase control over working hours and the attendant reduction in personnel fatigue. These changes thereby enhance the capability of plant personnel to maintain the status of systems and operational parameters within the envelope of acceptable conditions required by established procedures and regulations.

- iii) Involve a significant reduction in the margin of safety

The changes do not involve a significant reduction in the margin of safety since the addition of work hour restrictions reduces the likelihood of

personnel error in activities related to nuclear safety. To the contrary, the margin of safety in mitigating the consequences of an accident as evaluated in Chapter 14 of the PBAPS Updated Final Safety Analysis Report will be increased as a result of the overtime work restrictions.

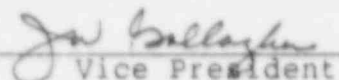
Environmental Consideration

This proposed amendment incorporates working hour restrictions for personnel performing safety-related functions. The Licensee has determined that this amendment involves no increase in the amounts and no change in the types of any effluents that may be released offsite, and has also determined that there is no increase in the individual or cumulative occupational exposure. Therefore, there is no environmental consideration involved and consequently an environmental report is not submitted.

Conclusion

The Plant Operations Review Committee and the Nuclear Review Board have reviewed these changes to the Technical Specifications and have concluded that they do not involve a significant hazards consideration and will not endanger the health and safety of the public.

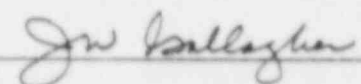
Respectfully submitted,
PHILADELPHIA ELECTRIC COMPANY


Vice President

COMMONWEALTH OF PENNSYLVANIA :
 : SS.
COUNTY OF PHILADELPHIA :

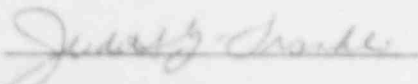
J. W. Gallagher, being first duly sworn, deposes and says:

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.



Vice President

Subscribed and sworn to
before me this 2nd day
of Sept, 1988.



Notary Public

JUDITH Y. FRANKLIN
Notary Public, Phila., Phila. Co.
My Commission Expires July 28, 1991