



PECO NUCLEAR

A UNIT OF PECO ENERGY

DS09
A. Madison
RECEIVED

1999 JUN -7 PM 3:51

RULES & DIR. BRANCH
US NRC

Station Support Department

64FR 19207

April 19, 1999

PECO Energy Company
Nuclear Group Headquarters
965 Chesterbrook Boulevard
Wayne, PA 19087-5691

9

May 28, 1999

Mr. David L. Meyer, Chief
Rules and Directives Branch
Division of Administrative Service
Office of Administration
Mail Stop T-6D59
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Supplemental Comments Concerning Recommended Improvements
to the Oversight Processes for Nuclear Power Reactors (SECY-99-007A)
(64FR19207, dated April 19, 1999)

Dear Mr. Meyer:

By letter dated May 18, 1999, PECO Energy submitted comments regarding the recommended improvements to the oversight processes for nuclear power plants as discussed in SECY-99-007A, "Recommendations for Reactor Oversight Improvements (Follow-up to SECY-99-007)," dated March 22, 1999. The NRC is proposing significant revisions to its processes for overseeing the safety performance of commercial nuclear power plants that include integrating the inspection, assessment, and enforcement processes. Our letter was submitted in response to the NRC's request for comments published in the Federal Register (i.e., 64FR19207, dated April 19, 1999).

PECO Energy appreciated the opportunity to comment on the proposed improvements to the NRC's oversight processes for nuclear power reactors. PECO Energy would like to offer one additional comment for consideration by the NRC. This comment pertains to using manual scrams as a measure of performance and is discussed in further detail below.

Comment

PECO Energy believes that a reactor scram is one of the most important and fundamental safety features. Reactor operators are under considerable pressure to run plants safely and efficiently. There are times when operators are challenged with a decision to continue operating a plant. In these circumstances, there often is time for operators to discuss the approach with management, except when a manual scram is needed. Manual scrams have saved plants from possible core damage over the years. PECO Energy believes that a scram is different from all other widely used Performance Indicators (PIs). We do not believe that it is prudent to consider manual scrams as a separate performance measure. We want to ensure that our operators' decision making process (or response) is conservative during critical activities, and not compromised by PI management. Therefore, we recommend that scrams be captured in PIs for transients and unplanned shutdowns.

1/0

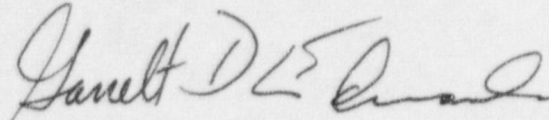
9906150116 990528
PDR SECY
99-007A C PDR

0 + 11-6 Comm M4

May 28, 1999
Page 2

If you have any questions, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Garrett D. Edwards". The signature is fluid and cursive, with the first name "Garrett" being the most prominent part.

Garrett D. Edwards
Director - Licensing