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April 30, 1986

Docket Nos. 50-277
50-278

Mr. Daniel R. Muller
BWR Project Directorate #2
Division of BWR Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: Peach Bottom Atomic Power Station
NRC Request for Additional Information
Concerning the Facility Staff Overtime
Work Amendment Request

REFERENCE: Correspondence dated March 25, 1986,
G. E. Gears, NRC, to E. G. Bauer, Jr., PECO

Dear Mr. Muller:

This letter responds to the questions submitted in the referenced letter regarding the November 1, 1985, Amendment Application adding facility staff overtime work limits to the Technical Specifications.

An Application for Amendment to the licenses was submitted on August 24, 1983, in response to Generic Letter No. 83-02, issued January 10, 1983, which requested that a specification limiting facility staff overtime work be incorporated into the administrative section of the Technical Specifications. The Generic Letter further stated that an acceptable specification would be either the policy statement attached to Generic Letter No. 82-12 (issued June 15, 1982), or the model Technical Specifications submitted as Enclosure 2 to Generic Letter No. 83-02. Since the guidance provided by these two Generic Letters was not identical, each was considered in the preparation of the Amendment Application.

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- c) The substitution of "the number of deviations to assure that excessive deviations are not being authorized " for "individual overtime shall be reviewed _____ to assure that excessive hours have not been assigned" was proposed to simplify the administration of the review process. The NRC guidance could be interpreted that the overtime of all individuals should be reviewed by Company management to assess compliance with the overtime specification. The proposed specification narrows the review to overtime that exceeds the overtime limits (deviations). This permits a more effective review.

We would be willing to meet with the NRC staff if further clarification is needed and to revise the license amendment application if improvements are deemed necessary to the proposed overtime specification.

Very truly yours,



cc: T. P. Johnson, Resident Site Inspector

Response

The NRC guidance requested deviations from the overtime limits to be authorized by the Plant Superintendent or his deputy, or higher levels of management. While the Plant Manager (equivalent of Plant Superintendent) is responsible for the administration and control of all activities at the plant site, it is the employing officer who is responsible for the administration and control of an individual's overtime. The Plant Manager is the employing officer for the senior reactor operators, reactor operators, health physics and chemistry technicians, and non-licensed operators for which the overtime limits apply. However, the maintenance, construction, and testing groups have an employing officer who is not the Plant Manager. The designation of the employing officer as the individual responsible for the authorization of deviations reflects the management structure of the Philadelphia Electric Company. The reference to "a senior staff member" permits the Plant Manager to delegate this task to a senior member of the station management in the interest of improving implementation of the overtime limits.

3. NRC Question - TS Item 6.19.3

Please explain the omission of the words used in GL 82-12 and NUREG-0737, Item I.A.1.3, "controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Plant Superintendent or his designee to assure that excessive hours have not been assigned" and replaced with "the employing officer or his designee shall review, at an average of once a month, the number of deviations to assure that excessive deviations are not being authorized".

Response

- a) Substitution of "employing officer" for "Plant Superintendent" was done for the reasons discussed in the response to Item 2 above.
- b) The substitution of "average of once a month" for "monthly" was to permit some schedule flexibility that recognizes other priorities of management, while still meeting the intent of the review process.

Subsequent to the August 24, 1983, Amendment Application submittal, the NRC staff reviewing the Application requested revisions to the licensee's proposed overtime specification. Accordingly, an Amendment to the August 24, 1983, Amendment Application was submitted November 1, 1985, conforming to the requested revisions. The March 25, 1986 letter, to which this letter is responding, requested an explanation for the deviations in the wording of both the August 24, 1983 and November 1, 1985 application from the NRC's suggested wording of the overtime specification (Enclosure 2 to Generic Letter No. 83-02).

Several deviations were proposed to improve the effectiveness of the overtime specification by clarifying the language, and by structuring the specification to be in accordance with the process by which overtime is authorized and controlled for personnel working at Peach Bottom. A response to your specific questions follows.

1. NRC Question - Technical Specification (TS) Item 6.19.2

Please explain omission of the words "for refueling, major maintenance, or major unit modification, on a temporary basis" following the existing words "extended periods of shutdown". The omitted words are included in Generic Letter (GL) No. 82-12 and NUREG-0737, Item I.A.1.3.

Response

The words in question were omitted since we felt they were redundant in meaning to the words "extended period of shutdown".

2. NRC Question - TS Item 6.19.3

Please explain the use of the words "individual's employing officer, his designated alternate, a senior staff member" instead of "plant superintendent or his deputy, or higher levels of management" which are included in GL 82-12 and NUREG-0737, Item I.A.1.3. Specifically, please explain what is meant by "employing officer".