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April 24, 1985

Docket No. 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
Technical Specification Amendment Request
dated May 29, 1984

REFERENCE: Correspondence dated March 18, 1985,
J. F. Stolz, NRC, to E. G. Bauer, Jr.,
Philadelphia Electric Company

Dear Mr. Stolz:

This letter responds to the request for additional information requested in the referenced letter. The request pertains to three of the six changes to the Administrative Controls Section of the Peach Bottom Atomic Power Station, Units 2 and 3 Technical Specifications, as proposed in an amendment application dated May 29, 1984.

1. NRC Request:

The proposed addition of a member to the Plant Operational Review Committee (PORC) would change the present number of PORC members from ten to eleven. The current PORC quorum requirements (Specification 6.5.1.5) specify the Chairman (or his alternate) plus four of the members or their alternates. The proposed addition of one more member to the PORC should be reflected in the adjustment of the PORC quorum by one member. This adjustment would reflect the NRC's position that the Chairman (or his designated alternate) and at least one-half of the members or their alternates make up a quorum.

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Response:

The request to add the Engineer - Outage Manager is hereby withdrawn. Consequently, no revisions are requested to page 246 of the Peach Bottom Technical Specifications. This decision was reviewed on April 4, 1985 with the NRC Project Manager and found to be acceptable.

2. NRC Request:

The proposed organizational change outlined under Item 5 of your application is acceptable because the new organization serves both the Peach Bottom and Limerick facilities and the NRC staff has recently approved this organization for the Limerick Station. It should be noted, however, that the organizational charts (Figures 6.2.1 and 7.1-1) in the Peach Bottom Technical Specifications are not the same as in the Limerick Technical Specifications (Figure 6.2.1-1). Please provide the rationale for the lack of consistency in these organizational charts.

Response:

We agree with the concept that the organization charts for Peach Bottom and Limerick should be consistent. The Peach Bottom chart depicts the management organization responsible for the administration of the Peach Bottom facility and uses a format previously considered acceptable to the NRC. The Limerick chart was expanded to include many of the off-site support organizations at the request of the NRC staff during the development of the Limerick Technical Specifications prior to issuance of the operating license on October 26, 1984.

The proposed Peach Bottom organization chart provides for minor revisions and adjustments to the organization, which do not affect its basic structure, without the restraints of the license amendment process. This would permit organizational changes which are necessary for effective management but cannot be, or historically have not been, promptly addressed through the regulatory process. The use of this provision would permit a more timely and effective response to the challenges confronting the nuclear industry and would not degrade the administration of activities essential to nuclear safety.

3. NRC Request:

Finally, the proposed revisions to the reporting period for the Nuclear Review Board (NRB) report and Safety Limit Violation report should be consistent for both the Limerick and Peach Bottom Technical Specifications since the NRB serves both plants. Please provide a basis for any proposed variation between the Limerick and Peach Bottom Technical Specifications concerning this request.

Response:

Proposed amendments to the Peach Bottom Atomic Power Station Technical Specifications are not intended to establish different reporting requirements. However, since the Limerick 5% license was issued on October 26, 1984, almost five months following the docketing of these proposed changes to the Peach Bottom Technical Specifications, it was not possible to anticipate every detail of the Limerick Technical Specifications.

The proposed revision to the reporting period on pages 252 and 253 of the Peach Bottom Technical Specifications, changes 14 calendar days to 10 working days. Fourteen calendar days provide ten working days of a traditional two-week work period without providing for holiday allowances which are available to a major portion of the work force. This change would focus attention on the quality of records rather than the urgency for their creation and distribution. This change would also establish consistency with the reporting requirements in Section 6.9.2 of the Peach Bottom Technical Specifications which was granted in Amendment No. 37 issued December 13, 1977 and recognizes the inherent pressures on existing personnel resources resulting from long established holiday traditions. This administrative subtlety was not recognized in the development of Limerick technical specifications. We endorse a similar philosophy for the Limerick Technical Specifications and in the interest of consistency intend to process a license amendment application at the appropriate time after issuance of the full power license for Limerick.

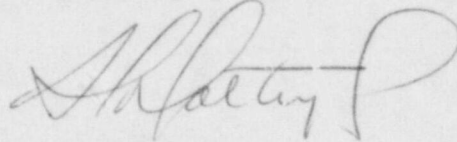
Mr. John F. Stolz

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Should you have any questions regarding this matter,
please do not hesitate to contact us.

Very truly yours,

A handwritten signature in cursive script, appearing to read "T. P. Johnson", written in dark ink.

cc: Dr. T. E. Murley, Administrator, Region I
T. P. Johnson, Resident Site Inspector