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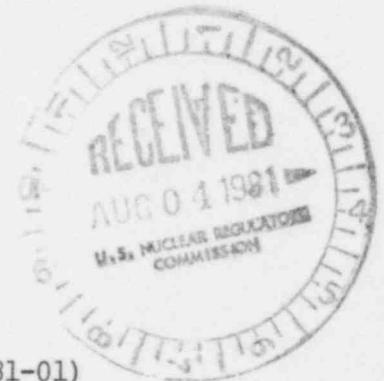
JUL 31 1981

JOHN S. KEMPER
VICE PRESIDENT
ENGINEERING AND RESEARCH

Docket No. 50-352
50-353

Mr. Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Limerick Generating Station Units 1 & 2
Qualification of Inspection, Examination and
Testing and Audit Personnel - Generic Letter 81-01)



Dear Mr. Eisenhut:

This letter is in response to your letter of May 4, 1981 which requested Philadelphia Electric Company to address Regulatory Guide 1.58, Revision 1, "Qualification of Nuclear Power Plant Inspection, Examination, and Testing Personnel" and Regulatory Guide 1.146, August 1980, "Qualification of Quality Assurance Audit Personnel for Nuclear Power Plants."

Philadelphia Electric Company will comply with the above Regulatory Guides as described in the attached Appendix.

The qualifications of Inspection, Examination, and Testing Personnel will be in accordance with the attached Appendix by March 31, 1982.

Existing procedures for the qualification of PECO QA organization audit personnel will be revised to reflect the guidance of Regulatory Guide 1.146 as modified by the alternates described in the attached Appendix. The revised procedures will be implemented by July 1, 1982. Current personnel not meeting the qualification requirements of the revised procedures by July 1, 1982 will continue to be considered qualified under the provisions of ANSI N45.2.12 - 1977 until eligible for qualification in accordance with the revised procedures. New audit personnel assigned to PECO QA organizations will be qualified in accordance with the revised procedures.

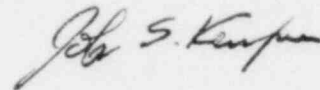
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Mr. Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission

Page 2

Should further information be necessary, do not hesitate to contact us.

Very truly yours,

A handwritten signature in cursive script, appearing to read "John S. Kempner". The signature is written in dark ink and is positioned to the right of the typed phrase "Very truly yours,".

APPENDIX

Alternates and Clarifications to Regulatory Guide 1.58, Revision 1 and Regulatory Guide 1.146, August 1980

Regulatory Guide 1.58, Revision 1, "Qualifications of Nuclear Power Plant Inspection, Examination, and Testing Personnel."
Endorses ANSI N45.2.6 - 1978.

Philadelphia Electric Company will comply with Regulatory Guide 1.58, Revision 1 and ANSI N45.2.6 - 1978 except for the following clarification and alternates:

- a. Regulatory Guide 1.58, Revision 1, Section C.1 and ANSI N45.2.6 - 1978, subsection 1.2 states that the standard applies to "personnel who perform inspections, examinations, and tests." Philadelphia Electric Company personnel who inspect equipment as part of routine plant maintenance, in other than a quality control function; and plant staff personnel (as defined in the PBAPS Technical Specifications), who approve test procedures and test results and direct or supervise the conduct of individual tests, will be qualified in accordance with ANSI N18.1 - 1971 in lieu of ANSI N45.2.6 - 1978.
- b. Regulatory Guide 1.58, Revision 1, Section C.4 and ANSI N45.2.6 - 1978, subsection 1.5 discuss the applicability of documents referenced in the standard. In lieu of the latest revision of Regulatory Guides and ANSI Standards, PECO commitments are contained in the Peach Bottom FSAR, Section 17.2, "Operational Quality Assurance Program."
- c. ANSI N45.2.6 - 1978, subsection 3.5 presents experience recommendations for candidates. Experience in maintenance, modification, and operating activities is considered related experience since such experience provides training in the safety aspects of the facility.

Regulatory Guide 1.146, August 1980, "Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants"
Endorses ANSI/ASME N45.2.23 - 1978.

Philadelphia Electric Company will comply with Regulatory Guide 1.146, August 1980 and ANSI/ASME N45.2.23 - 1978 except for the following alternates:

- a. Regulatory Guide 1.146, August 1980, Section C.1 and ANSI/ASME N45.2.23 - 1978, subsection 1.5 discuss the

applicability of documents referenced in the standard. In lieu of the latest revision of Regulatory Guides and ANSI Standards, PECO commitments are contained in the Peach Bottom FSAR, Section 17.2, "Operational Quality Assurance Program."

- b. ANSI/ASME N45.2.23 - 1978, subsection 2.3 states requirements for qualification of auditors. In lieu of the stated requirements, PECO will qualify personnel in accordance with the requirements presented below. These alternate requirements will provide PECO with sufficient flexibility to qualify competent personnel with initial technical experience in a more effective manner. The proration of credits between initial experience requirements and additional experience gained as an assistant to a Lead Auditor assures that highly qualified personnel will be available as audit personnel in a more timely fashion.

Substitute the following for paragraph 2.3.1 of ANSI/ASME N45.2.23 - 1978:

2.3.1 Education and Experience. The prospective Lead Auditor shall have verifiable evidence that a minimum of ten (10) credits under the following scoring system have been accumulated.

2.3.1.1 Education (4 credits maximum). Associate degree from an accredited institution score one (1) credit or if the degree is an engineering, physical sciences, mathematics, or quality assurance, score two (2) credits or,

a bachelor degree from an accredited institution score two (2) credits or if the degree is in engineering, physical sciences, mathematics, or quality assurance, score three (3) credits; in addition score one (1) credit for a master degree in engineering, physical sciences, business management, or quality assurance from an accredited institution.

2.3.1.2 a) Initial Experience Prior to Assignment (6 credits maximum). Technical experience in engineering, manufacturing, construction, operation, maintenance, or quality assurance related to the aforementioned activities, score one (1) credit for each full year with a

maximum of five (5) credits for this aspect of experience.

If two (2) or more years of this experience have been in the nuclear field, score one (1) additional credit.

2.3.1.2 b) Additional Experience (after assignment) (4 credits maximum). Experience in quality assurance, score one (1) credit for each full year (2 credits maximum) or,

Experience in auditing, score two (2) credits for each full year (3 credits maximum) or,

Experience in nuclear quality assurance, score one (1) credit for each full year (3 credits maximum) or,

Experience in nuclear quality assurance auditing, score one (1) credit per every six months (4 credits maximum).

2.3.1.3 Other Credentials of Professional Competence (2 credits maximum). Certification of competency in engineering, science, or quality assurance specialties issued and approved by a State Agency, or National Professional or Technical Society, score two (2) credits.

2.3.1.4 Rights of Management (2 credits maximum). The Lead Auditor's employer may grant up to one (1) credit for other performance factors applicable to auditing which may not be explicitly called out in this standard such as leadership, sound judgement, maturity, analytical ability, tenacity, and past performance, plus one (1) credit for satisfactory completion of Lead Auditor training program.