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10CFR55.11

NUCLEAR ENGINEERING & SERVICES DEPARTMENT

May 31, 1991

Docket Nos. 50-352  
50-353  
50-277  
50-278  
License Nos. NPF-39  
NPF-85  
DPR-44  
DPR-56

Dr. Thomas E. Murley, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

SUBJECT: Limerick Generating Station, Units 1 and 2  
Peach Bottom Atomic Power Station, Units 2 and 3  
Request for Exemption from 10CFR55.53(e)  
Related to Maintaining the Active Status of  
a License for Senior Reactor Operators Limited  
to Fuel Handling (LSROs) and Proposed  
Frequency/Duration of LSRO Regualification Training

Dear Dr. Murley:

We are submitting this letter (1) to request an exemption, in accordance with 10CFR55.11, from the requirements of 10CFR55.53(e) with respect to the number of hours and frequency required for a Senior Reactor Operator limited to fuel handling (LSRO) to actively perform the functions of an LSRO, in order to maintain an active LSRO license, and (2) to provide information describing our plans regarding the frequency and duration of LSRO regualification training.

Exemption Request

10CFR55.53(e) stipulates that in order to maintain the active status of an operator's license, a licensee shall actively perform the functions of an operator or senior operator on a minimum of seven 8-hour (56 hours) or five 12-hour (60 hours) shifts per calendar quarter. This rule makes no distinction between the functions of a Senior Reactor Operator (SRO) and an LSRO.

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We have implemented a new LSRO program that established LSROs with a dual license applicable at both Limerick Generating Station (LGS), Units 1 and 2, and Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3. The objective of the LSRO program is to maintain a small group of licensed personnel to supervise core alterations (reactor refueling and invessel maintenance activities) during refueling outages at each of the four LGS and PBAPS nuclear units. There are currently nine (9) LSROs who hold a dual SRO license limited to fuel handling. 10CFR55.53(e) requires an SRO to actively perform the functions of an SRO for a minimum of 56 hours per calendar quarter to maintain an active SRO license. However, the LSROs only perform licensed duties that are associated with refueling-related activities during the refueling outages at LGS and PBAPS. Our refueling outages for LGS and PBAPS are scheduled on an alternating basis such that there are two (2) units in a refueling outage each year; one unit at LGS in the spring and one unit at PBAPS in the fall. Because of the limited scope of LSRO duties combined with the refueling schedule related frequency during which these duties are performed, the LSROs will not be able to maintain their licenses in an active status in accordance with the requirements of 10CFR55.53(e). Therefore, we request an exemption from 10CFR55.53(e) such that the hours and frequency required for an LSRO to actively perform LSRO functions in order to maintain an active LSRO license be established at a minimum of 28 hours semiannually. This proposed requirement is commensurate with the scope of LSRO duties and the frequency at which they are performed.

The justification for this exemption request is provided below in accordance with 10CFR51.11. In addition, information is provided in accordance with 10CFR51.30 which supports the conclusion that the approval of this exemption request would not have an effect on the environment.

#### Justification for the Exemption

Under 10CFR55.11, the NRC may grant exemptions from the requirements of 10CFR55 which are authorized by law and will not endanger life or property, and are otherwise in the public interest.

We are requesting an exemption from the requirement of 10CFR55.53(e) which establishes the hours and frequency required for a licensed operator to actively perform the applicable licensed duties in order to maintain an active license. The purpose of this requirement is to maintain the proficiency of the operators who are performing the licensed duties. The scope of LSRO duties is limited relative to the duties of an SRO. At Philadelphia Electric Company (PECO), the LSRO duties are highly specialized and focus only on those duties associated with refueling-related activities. As such, the LSRO licensed duties are only performed during the alternating refueling outages at LGS and PBAPS each year. In other words, the LSRO duties involve a concentrated effort on a periodic basis, and given the nature

of the duties, are performed as often as is possible. Additionally, because the proposed LSRO program only calls for a small number of LSROs, we expect that these individuals will participate in each LGS and PBAPS refueling outage each year during the time they hold an LSRO license. Actual experience indicates that LSRO proficiency has increased as a result of participation by the same LSROs in the previous three (3) refueling outages; LGS Unit 1, PBAPS Unit 2, and LGS Unit 2. Our LSRO program calls for a commitment of four (4) years from each LSRO with personnel rotating through the program on a staggered basis to provide for a change in personnel while maintaining an optimum level of experience among the LSROs. Therefore, we conclude that establishing a requirement of 28 hours semiannually to maintain an active LSRO license meets the underlying purpose of 10CFR55.53(e) to maintain the proficiency of the LSROs.

#### Environmental Assessment

##### Environmental Impact of the Proposed Action

Approving this exemption request will not impact the environment since it does not involve the release of radioactive or non-radioactive effluents.

##### Alternative to the Proposed Action

The previous section provides the basis for concluding that there are no environmental effects which would result from the approval of the requested exemption. Accordingly, any alternatives with any environmental impact other than not approving this exemption request, need not be evaluated.

##### Alternate Use of Resources.

This exemption request, if granted, does not involve the use of any resources not previously considered in the Final Environmental Impact Statements for the LGS and PBAPS facilities.

##### Proposed Finding of No Significant Impact

Based upon the foregoing environmental assessment, we conclude that the approval of our exemption request will not have an effect on the quality of the human environment.

#### LSRO Regualification Training Frequency and Duration

10CFR55.59(c)(1) stipulates that the regualification program must be conducted for a continuous period not to exceed two years, and upon conclusion must be promptly followed, pursuant to a continuous schedule, by successive regualification programs. The purpose of 10CFR55.59(c)(1) is to ensure that the operator's regualification training is relative to the licensed duties performed and is commensurate with the frequency at which they are performed. An SRO performs a broad scope of licensed duties on a continuous basis, and therefore, SRO regualification

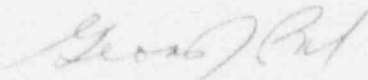
training is conducted continuously over a two year period. The requalification training for LGS and PBAPS SROs, conducted just prior to a scheduled refueling outage, focuses on the duties to be performed during the outage.

Similarly, the duration and frequency of our proposed LSRO requalification training is commensurate with the scope and frequency of LSRO duties. The LSRO duties are limited to those associated with refueling-related activities, and are performed as often as is possible (i.e., every refueling outage with two refueling outages per year). Therefore, the LSRO requalification training will be conducted over a two year period and will consist of two (2) training cycles per year; one cycle, at least 40 hours in length, prior to each site's refueling outage. As a minimum, one cycle will be conducted at each site (LGS and PBAPS) per year. In other words, LSRO requalification training, relative to LSRO duties, will be conducted just prior to when those duties are required to be performed.

Therefore, we conclude that the proposed LSRO requalification training frequency and duration will implement the purpose of 10CFR55.59(c)(1) and consequently satisfies the requirements of the rule with regard to the conduct of a requalification program for a continuous period not to exceed two years. If the NRC does not concur with our assessment, please consider the information provided in this letter as a request and justification for an exemption, in accordance with 10CFR55.11, from the requirements of 10CFR55.59(c)(1).

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

Very truly yours,



G. J. Beck, Manager  
Licensing Section  
Nuclear Engineering and Services

cc: T. T. Martin, Administrator, Region I, USNRC  
T. J. Kenny, USNRC Senior Resident Inspector, LGS  
J. J. Lyash, USNRC Senior Resident Inspector, PBAPS