

PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

955-65 CHESTERBROOK BLVD.

WAYNE, PA 19087-5691

(215) 640-6000

April 20, 1990

Docket Nos. 50-277
50-278

License Nos. DPR-44
DPR-56

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

SUBJECT: Peach Bottom Atomic Power Station, Units 2 and 3
Supplement to Technical Specifications Change Request

REFERENCE: Letter from G. A. Hunger, Jr. (PECo) to
USNRC dated July 11, 1989

Dear Sir:

In the above referenced letter, Philadelphia Electric Company submitted Technical Specification Change Request (TSCR) No. 88-06. This TSCR consisted of two categories of Changes. The Category A changes involved removing the organization charts as recommended by Generic Letter 88-06, and the Category B changes were miscellaneous administrative changes. The purpose of this letter is to amend the original TSCR. The attached revisions affect only the Category A changes, and involve the following: 1) withdrawal of previously proposed Table of Contents pages vi and via, 2) revision of Safety Assessment for the shift crew composition and 3) addition of an asterisked note to proposed Table 6.2.1 "Shift Crew Composition - Minimum Requirements" to ensure accurate interpretation of the proposed Table.

The following replacement pages for the original submittal referenced above are provided: pages 2, 6, 7, 9 and the List of Proposed Changes for Attachment 1, the cover sheet for Attachment 2, proposed Unit 2 Technical Specifications (TS) pages i, vi, vii and 245 and proposed Unit 3 TS pages iv, vii and 245. The vertical bars in the right hand margin of the pages in Attachment 1 and the cover sheet to Attachment 2 indicate changes from the original submittal. The vertical bars in the margins of the revised proposed TS pages refer to changes to the currently approved version of the TS.

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The changes contained herein do not affect the Finding of No Significant Hazards Consideration, the Environmental Impact Assessment or the Conclusions previously submitted.

If you have any questions regarding this matter, please contact us.

Very truly yours,

G. A. Hunger, Jr.
G. A. Hunger, Jr.
Manager-Licensing
Nuclear Engineering and
Services Department

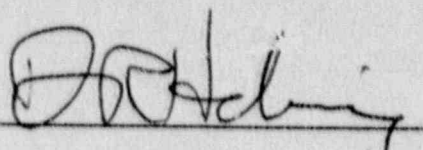
Enclosure: Affidavit
Attachments

cc: T. T. Martin, Administrator, Region I, USNRC
J. J. Lyash, USNRC Senior Resident Inspector
T. M. Gerusky, Director, PA Bureau of Radiological Protection

COMMONWEALTH OF PENNSYLVANIA :
: ss.
CHESTER COUNTY :

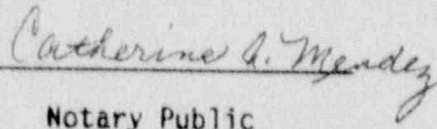
D. R. Helwig, being first duly sworn, deposes and says:

That he is Vice President of Philadelphia Electric Company, the Applicant herein; that he has read the attached supplement to request (No. 88-06) for changes to Peach Bottom Units 2 and 3 Facility Operating License Nos. DPR-44 and DPR-56, and knows the contents thereof; and that the statements and matters set forth therein are true and correct to the best of his knowledge, information and belief.

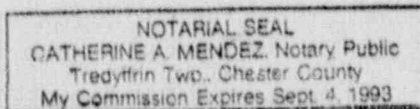


Vice President

Subscribed and sworn to
before me this 20th day
of April, 1990.



Notary Public



Philadelphia Electric Company, Licensee under facility operating Licenses DPR-44 and DPR-56, for Peach Bottom Atomic Power Station Unit No. 2 and Unit No. 3, respectively, hereby requests that the Technical Specifications contained in Appendix A to the Operating Licenses be amended. Proposed changes to the Technical Specifications are indicated by the vertical bars in the margins of the pages contained in Attachment 2 and listed here: iv (Unit 3 only), iva (Unit 2 only), vii, 243, 244, 245, 245a, 246, 252 and 252a.

This application is submitted primarily as a result of Generic Letter 88-06 "Removal of Organization Charts from Technical Specification Administrative Control Requirements" which encourages licensees to propose changes to their Technical Specifications to remove organization charts from Technical Specifications and replace them with descriptions of the organizational structure and characteristics which are important to safety. The proposed changes concern the Administrative Controls in Section 6.0, and do not affect any Limiting Conditions for Operation or Surveillance Requirements. The proposed changes in this Application are grouped into two categories. Each category of changes includes a Description of Changes, a Safety Discussion and a Significant Hazards Consideration. Category 'A' changes involve removing the onsite and offsite organization charts from Sections 6.2.1 and 6.2.2, respectively. These changes are consistent with the guidance

replace it with "The facility organization shall be subject to the following:".

5. Remove the onsite organization chart shown as Figure 6.2-2 (Sheets 1 and 2).
6. Add Table 6.2.1 to show the minimum shift crew composition. This information was included in Figure 6.2-2 which is proposed to be deleted.
7. Delete the reference to Figure 6.2-2 in paragraph 6.2.2.a and replace it with a reference to Table 6.2.1.
8. Add paragraph 6.2.2.g which reads "In addition to the requirements of 6.2.2.a, the following shall hold a senior reactor operator license: 1) Plant Manager or Superintendent-Operations, 2) Assistant Superintendent-Operations and 3) Superintendent-Technical or Engineer-Systems." This information was included in Figure 6.2-2 which is proposed to be deleted.
9. Revise the Table of Contents pages iva and vii for Unit 2 and pages iv and vii for Unit 3 to reflect the deletion of Figures 6.2-1 and 6.2-2 and the addition of Table 6.2.1.

Safety Discussion - Category 'A'

Deletion of the charts is accompanied by the addition of general administrative control requirements which describe the essential aspects of the organizational structure defined in the organization charts. The additional administrative control descriptions are contained in the proposed paragraph 6.2.1.a through d. They involve the designation of safety responsibilities and organizational freedom of the health physics, training and quality assurance groups. The independence of the quality assurance group is further guaranteed by adherence to 10 CFR 50 Appendix B, Criterion I.

Removing the organization charts from the Technical Specifications will have a positive impact on safety by permitting a licensee to implement changes to its organizational structure without prior NRC approval provided that the change meets the general administrative controls and organizational objectives specified in proposed paragraph 6.2.1. Consequently, enhancements to the organizational structure, as well as minor administrative changes such as position title revisions, can be implemented promptly upon identification of the need for the change. Safety is

10 CFR 50.34(b)(6) requires that the organizational structure, along with responsibilities and authorities, be included in the Final Safety Analysis Report. Section 13 of the Peach Bottom Updated Final Safety Analysis Report (UFSAR) contains the important organizational features currently depicted on Figures 6.2-1 and 6.2-2. This information is required by 10 CFR 50.71(e) to be maintained and updated annually. Thus, even in the absence of the organization charts from the Technical Specifications, there remains assurance that onsite and offsite organizations will be established and maintained to assure operation of the facility in a safe manner.

The proposed Category 'A' changes are considered to be administrative. The management positions requiring an NRC license do not change nor does the shift crew composition. Further, the proposed Category 'A' changes do not increase or decrease the qualification, experience or training requirements of onsite or offsite nuclear personnel.

Significant Hazards Consideration - Category 'A'

- (1) The proposed Category 'A' changes do not involve a significant increase in the probability or consequences of any accident previously evaluated.

List of Proposed Changes

<u>Section Affected</u>	<u>Proposed Changes</u>
Page iv (Unit 3) Page iva (Unit 2)	Designate Figures 6.2-1 and 6.2-2 as deleted.
Page vii	Add Table 6.2.1 to list.
Page 243 Paragraph 6.1.2	Add designation of Shift Supervisor as having control room command.
Paragraph 6.2.1	Change title "Offsite" to "Offsite and Onsite Organizations". Delete existing paragraph 6.2.1 and add specifications 6.2.1.a through 6.2.1.d as recommended in GL 88-06.
Page 244	Delete Figure 6.2-1.
Paragraph 6.2.2	Replace "as shown on Figure 6.2-2 and:" with "subject to the following:".
Paragraph 6.2.2.a	Replace reference to Figure 6.2-2 with a reference to Table 6.2.1.
Paragraph 6.2.2.g	Add license requirements of station managers as required by GL 88-06.
Page 245	Delete Figure 6.2-2 Sheet 1 and add Table 6.2.1.
Page 245a	Delete Figure 6.2-2 Sheet 2
Page 246 Paragraph 6.5.1.2	Replace the Technical Engineer with the Engineer-Systems as a PORC member.
Page 252 Paragraph 6.5.2.9	Remove the "Office of the Chief Executive".
Page 252a Paragraph 6.5.2.10.c	Replace the "Executive Vice President-Nuclear" with "Corporate Officer(s)".