

Attachment 1

LIMERICK GENERATING STATION

UNITS 1 and 2

Docket Nos. 50-352

50-353

License Nos. NPF-39

NPF-85

TECHNICAL SPECIFICATIONS CHANGE REQUEST

"Modify the Requirement for Individuals Filling Certain Plant  
Management Positions to Hold A Senior Reactor Operator License"

Supporting Information for Changes - 5 pages

Philadelphia Electric Company (PECo), licensee under Facility Operating License Nos. NPF-39 and NPF-85 for Limerick Generating Station (LGS), Units 1 and 2, requests that the Technical Specification (TS) be amended as proposed below to change the plant staff positions that are required to be filled by individuals holding a Senior Reactor Operator (SRO) License.

This TS Change Request for LGS Units 1 and 2, provided a discussion and description of the proposed change, a safety assessment, information supporting a finding of No Significant Hazards Consideration, and information supporting an Environmental Assessment.

The Unit 1 and Unit 2 TS pages showing the proposed change are provided in Attachment 2.

We request that, if approved, the TS change be effective upon issuance.

#### Discussion And Description Of The Proposal Change

The proposed TS change is as follows.

- Change TS Section 6.2.2, paragraph "g" to: 1) require that the Plant Manager or Superintendent-Operations or the Assistant Superintendent-Operations hold a Senior Reactor Operator (SRO) License; and 2) delete the requirement for the Superintendent-Technical or the Technical Engineer to hold a SRO License.

This change is being proposed in order to allow the individuals filling certain plant management positions to focus more time and attention on plant operation without being diverted by the time required to be spent in Licensed Operator Regualification (LOR) training in order to maintain a SRO License. Implementation of the proposed change regarding individuals filling certain plant management positions that must hold a SRO License will continue to satisfy the guidance provided by the applicable criteria in ANSI Standard ANSI/ANS-3.1-1978, "Standard for Selection and Training of Personnel for Nuclear Power Plants."

#### Safety Assessment

This proposed TS change involves modifying and deleting the current TS requirement that individuals filling certain key plant management positions hold a SRO License. This proposed change does not directly impact any accidents previously evaluated since implementation of this proposed change will not involve any physical changes to plant systems, structures, or components (SSC), or the manner in which these SSC are operated, maintained, modified, tested, or inspected. This proposed change will, if approved, allow the individuals filling the affected plant management positions to focus more attention to the day-to-day

operations and modifications of the plant while maintaining the requirement that one of the individuals filling the Operations organization management positions meet the experience and training needed to obtain and hold a SRO License in accordance with ANSI/ANS-3.1-1978.

Information Supporting A Finding Of No Significant Hazards Consideration

We have concluded that the proposed change to the LGS Unit 1 and Unit 2 TS, that modify the requirement that individuals filling certain plant management positions hold a SRO License, does not involve a Significant Hazards Consideration. In support of this determination, an evaluation of each of the three standards set forth in 10CFR50.92 is provided below.

1) The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The probability of occurrence of an accident is based in part on the training and qualification requirements applicable to the personnel filling key plant management positions. Accordingly, the qualifications and scope of responsibilities applicable to plant management positions relative to the guidance in ANSI/ANS-3.1-1978, as described in UFSAR Section 13.1, "Conduct of Operations," were originally reviewed and approved by the NRC during the initial plant licensing. Specifically, LGS Updated Final Safety Analysis Report (UFSAR) Section 13.1.3, "Qualification of Nuclear Plant Personnel," details the following correspondence between plant management positions and the criteria in ANSI/ANS-3.1-1978.

<u>Plant Management Position</u>	<u>ANSI/ANS-3.1-1978</u>	
	<u>SECTION</u>	<u>TITLE</u>
Plant Manager	4.2.1	Plant Manager
Superintendent-Operations	4.2.1	Plant Manager
Assistant Superintendent-Operations	4.2.2	Operations Manager
Superintendent-Technical	4.2.4	Technical Manager
Technical Engineer	4.2.4	Technical Manager

Section 4.2.1, "Plant Managers," of ANSI/ANS-3.1-1978 states in part that "...The plant manager shall have acquired the experience and equivalent training normally required to be eligible for a Senior Reactor Operator's license ..." unless the plant organization includes one or more persons who are designated as principal alternatives for the plant manager and who meet the nuclear power plant experience and training requirements established for the plant manager. As shown above, the Superintendent-Operations is designated as the Plant Manager's principal alternative. ANSI/ANS-3.1-1978, Section 4.2.2,

"Operations Manager," states in part that at the time of "...appointment to the position... the operations manager shall hold a Senior Reactor Operator's license...." Requiring the Plant Manager or the Superintendent-Operations, or the Assistant Superintendent-Operations to hold a SRO License will continue to ensure conformance with this criterion. ANSI/ANS-3.1-1978, Section 4.2.4, "Technical Manager," does not include any recommendation that the Technical Manager have the training to be eligible for, or hold, a SRO License.

The proposed TS change involves changing the current TS requirement that 1) the Plant Manager or the Superintendent-Operations, and the Assistant Superintendent-Operations, and 2) the Superintendent-Technical or the Technical Engineer, hold a SRO License, to the following: a) the Plant Manager or the Superintendent-Operations or the Assistant Superintendent-Operations hold a SRO License, and b) delete the requirement for the Superintendent-Technical or the Technical Engineer to hold a SRO License. This proposed change would continue to require that one of the individuals in the management chain of command responsible for the management of plant operations as well as day-to-day operating activities and conformance to the operating license, TS, and operating procedures demonstrate detailed operating knowledge and successfully complete training required to obtain and hold a SRO License, while deleting the unnecessary requirement that the Superintendent-Technical or the Technical Engineer hold a SRO License. Also, licensed plant shift operators will continue to report to a management position filled by an individual who holds a SRO License.

Operations management and Technical management personnel would continue to maintain cognizance of pertinent plant, procedure, and TS changes by virtue of the responsibilities of their plant management positions, TS required PORC membership, and roles in the Emergency Response Organization (ERO). These responsibilities include review and/or approval of proposed new or revised operating procedures and oversight of licensed operator requalification training. Therefore, the qualifications of the Operations and Technical management personnel, in the chain of command to the Plant Manager, will remain at the currently required level. Furthermore, those key plant management individuals who will no longer be required to hold a SRO License will be able to devote the time now spent in LOR training to increase their overview and involvement in plant operating and planning activities. Accordingly, the probability of occurrence of an accident previously evaluated based on the training and qualification of key plant management personnel, is not increased by the proposed change to the current requirements concerning managers who must hold a SRO License.

This proposed change does not involve any changes to plant systems, structures, or components (SSC). Therefore, no physical changes that could change the probability of occurrence of an accident previously evaluated would be made to the plant in order to implement this proposed change. The impact of the change to administrative requirements resulting from the implementation of this proposed TS change is discussed above, and has been determined to not increase the probability of occurrence of an accident previously evaluated.

The consequences of an accident previously evaluated could be affected by the qualifications of plant management personnel to which the plant operators report via the chain of command. As explained above, the proposed TS change to require at least one individual in the Operations organization chain of command to hold a SRO License will continue to meet guidance provided by the applicable criteria in ANSI/ANS-3.1-1978.

The proposed TS change does not involve any physical changes to plant SSC, or in the manner in which plant SSC are operated, maintained, modified, tested, or inspected. Therefore, the proposed TS change does not increase the consequences of accidents previously evaluated.

Accordingly, as explained above, the proposed TS change does not involve an increase in the probability or consequences of an accident previously evaluated.

2) The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

This proposed change involving the qualifications (e.g., obtain and hold a SRO License) of key plant management personnel can not create the possibility of a new or different type of accident than previously evaluated since no substantive change to the current requirements is involved as discussed above. Also, since the proposed TS change does not involve physical changes to plant SSC, the possibility of creating a different type of accident than previously evaluated in the SAR can not be created. Therefore, the possibility of a new or different type of accident than previously evaluated in the SAR is not created.

3) The proposed changes do not involve a significant reduction in a margin of safety.

The margin of safety of overall plant operating activities is based in part on the TS requirements that personnel serving in key plant management positions satisfy qualification criteria specified in ANSI/ANS-3.1-1978. The proposed change to the TS does not reduce these established qualifications that key plant management personnel must currently satisfy. In addition, implementation of the proposed TS changes will allow the affected plant management



individuals to use the time now spent in LOR training (i.e., approximately one week out of every six week period throughout the year) to increase their involvement in plant operational matters and planning activities. Therefore, the proposed TS change does not reduce the margin of safety.

#### Information Supporting An Environmental Assessment

An environmental assessment is not required for the change proposed by this Change Request because the requested change conforms to the criteria for "actions eligible for categorical exclusion," as specified in 10CFR51.22(c)(9). The requested change will have no impact on the environment. The proposed change does not involve a Significant Hazards Consideration as discussed in the preceding section. The proposed change does not involve a significant change in the types or significant increase in the amounts of any effluent that may be released offsite. In addition, the proposed change does not involve a significant increase in individual or cumulative occupation radiation exposure.

#### CONCLUSION

The Plant Operations Review Committee and the Nuclear Review Board have reviewed this proposed change to the TS and determined that it does not involve an Unreviewed Safety Question and will not endanger the health and safety of the public.

Attachment 2

LIMERICK GENERATING STATION

UNITS 1 and 2

License Nos. NPF-39

NPF-85

PROPOSED TECHNICAL SPECIFICATIONS CHANGES

List of Attached Pages

Unit 1

6 - 3

Unit 2

6 - 3

## ADMINISTRATIVE CONTROLS

---

### UNIT STAFF (Continued)

Any deviation from the above guidelines shall be authorized by the Plant Manager or personnel designated in administrative procedures or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Plant Manager, or the appropriate designated personnel to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized; and

- g. The Plant Manager or the Superintendent Operations or the Assistant Superintendent Operations shall hold a Senior Reactor Operator License.



## ADMINISTRATIVE CONTROLS

---

### 6.2.2 UNIT STAFF (Continued)

3. A break of at least 8 hours should be allowed between work periods, including shift turnover time.
4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the Plant Manager or personnel designated in administrative procedures or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Plant Manager, or the appropriate designated personnel to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized; and

- g. The Plant Manager or the Superintendent Operations or the Assistant Superintendent Operations shall hold a Senior Reactor Operator License.