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SHIELDS L. DALTROFF
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ELECTRIC PRODUCTION

December 28, 1982

Docket Nos. 50-277
50-278

Mr. J. F. Stolz, Chief
Operating Reactors Branch #4
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

SUBJECT: Licensed Operator Training Program
Peach Bottom Atomic Power Station

Dear Mr. Stolz:

This letter corrects errors in a description of the Peach Bottom Atomic Power Station licensed operator training program submitted under a cover letter dated April 30, 1981, and provides justification for not having a specific event oriented procedure for loss of instrument air. The need for this correspondence was identified by the NRC Region I inspectors at a meeting on December 8, 1982.

The Operator Licensing Branch, in a phone conversation on November 21, 1980 requested the transmittal of a description of the current licensed operator training program. The information was subsequently submitted on April 30, 1981. At the time of the submittal, the training program was being revised to reflect the new NRC training criteria issued in a March 28, 1980 letter (H. R. Denton to All Power Reactor Licensees). The description submitted represented an early draft of the proposed new training program and contained several errors that were subsequently corrected prior to the implementation of the new program. The corrections are as follows:

mo03

1. Delete item 8, loss of instrument air, on page 2 from the description of the Licensed Operator Requalification Program submitted with the April 30, 1981 letter. The NRC training criteria presented in the March 28, 1980 letter specified training in a loss of instrument air event at Peach Bottom if simulated plant specific. Since a Peach Bottom specific loss of instrument air event is not simulated at the Training Simulator, this event is not identified in the current description of the training program. However, the current licensed operator training program, and the training associated with the new symptomatic emergency procedures, do address operator responses to plant conditions which can result from a loss of instrument air. For these reasons, we believe that the Peach Bottom training program is in compliance with the NRC criteria delineated in the March 28, 1980 letter.
2. Delete item 22, Malfunction of reactor coolant pressure/volume control system, on page 3 from the description of the Licensed Operator Requalification Program. This mode of control is not applicable to the BWR design. Malfunctions of automatic control systems which affect reactivity are covered under item 21, page 3.

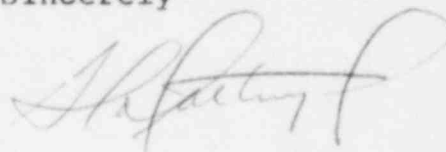
The other issue raised at the December 9, 1982 meeting involved compliance with Section 6.8.1 of the Peach Bottom Technical Specifications. Section 6.8.1 requires written procedures that conform to the requirements of Regulatory Guide 1.33. The Guide describes an acceptable method of complying with the requirement for written procedures. Included in the list of procedures identified in the Guide is a "loss of instrument air" procedure. Previous discussions with the NRC inspector concluded that a loss of instrument air procedure was not necessary because of the low probability that such an event would occur at Peach Bottom, and the availability of emergency procedures that address plant conditions that may result from this event. The new symptomatic procedures, developed in response to the requirements of NUREG 0737, Item I.C.1, address plant conditions resulting from a wide spectrum of events, and therefore meets the intent of Regulatory Guide 1.33. The new procedures are based on the Emergency Procedure Guidelines developed by the BWR Owners' Group and previously submitted to the NRC for review.

Mr. J. F. Stolz, Chief

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

Sincerely

A handwritten signature in cursive script, appearing to read "J. F. Stolz", written in dark ink.

cc: R. A. Blough
Site Inspector - Peach Bottom

R. W. Starostecki, Region I

P. Beckhan
Operating Licensing Branch
Nuclear Regulatory Commission
Washington, D. C. 20555