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December 22, 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: NUREG-0737, Item II.B.4,
Training for Mitigating Core Damage

Dear Mr. Stolz:

This letter provides clarification of the Peach Bottom Atomic Power Station's training program for the implementation of NUREG 0737, Item II.B.4, Training for Mitigating Core Damage and provides confirmation that the requirement has been met for the plant manager (Peach Bottom Station Superintendent). The clarification was requested by the NRC Region I inspectors reviewing this issue during a meeting on December 8, 1982. Item II.B.4 requires participation by the shift technical advisors and operating personnel from the plant manager through the operations chain to the licensed operators in a training program for the use of installed systems to control or mitigate accidents in which the core is severely damaged.

In response to the March 28, 1980 letter on qualifications of reactor operators (H. R. Denton to All Power Reactor Licensees), training for mitigating core damage was incorporated into the Peach Bottom licensed operator training program. The Station Superintendent attended the initial training program developed for this subject in 1980. Subsequently, NUREG 0737, Item II.B.4 expanded the mitigating core damage training requirements to include other appropriate personnel such as the plant manager and shift technical advisors (STAs). While the need to repeat this training every year was not addressed in Item II.B.4, the training is provided every year as part of the requalification program for STAs and all licensed

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personnel. In addition to the licensed shift personnel, the Peach Bottom Technical Specifications requires three members of plant management to be senior licensed operators. These are the Operations Engineer, Technical Engineer, and either the Station Superintendent or Assistant Station Superintendent. Further, it has been our policy to license other members of the plant staff in order to ensure their promotional opportunities and to enhance the qualifications of the plant staff. Currently, nine engineers, in addition to those requiring a license by the Technical Specifications, possess a senior operators license. While the number of licensed engineers on the staff will vary, we will continue to provide training for mitigating core damage for all individuals possessing SRO or RO licenses.

However, we propose that the mitigating of core damage training for the station superintendent (plant manager) be limited to the initial training considering his past experience and training. As stated previously, the station superintendent participated in the 1980 training program. In addition, the station superintendent obtained the 1982 lesson plan and notes used by the instructor providing requal training sessions on mitigating core damage and reviewed this information as a self-study activity. Topics in this lesson plan included heat transfer mechanisms during both normal and degraded core conditions, a review of CPR, LHGR, and APLHGR and their relationship to cladding integrity, the Zr-H₂O reaction, hydrogen generation rates, effect of ECCS and RPS response, and the fission product release during degraded core conditions. Further, the in-core, as well as ex-core instrumentation was reviewed from the standpoint of operability during transients and the information available via these sources.

In addition to mitigating core damage training, the station superintendent, during 1982, attended three days of simulator training which covered the new symptomatic emergency procedures. These procedures discuss operation of the plant during events which go beyond those described in the FSAR, and involve many operations requiring knowledge of instrumentation and considerations of degraded core damage. The Station Superintendent also was involved in several practice emergency exercises, as well as the graded emergency drill of 1982. The scenarios provided in these drills provided additional review of operations which may be required during significant reactor transients which result in core damage.

Since the Station Superintendent completed the mitigating core damage training in 1980, we believe that the requirements of NUREG-0737, Item II.B.4, have been met. Although the Station Superintendent has not participated in the formal requalification program (which is not required by Item II.B.4) it is our view that the Station Superintendent's knowledge in this area has been sufficiently established based on his wide range of experience (more than eleven years as Superintendent of Peach Bottom) and the depth of training previously described.

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

Sincerely,

A handwritten signature in cursive script, likely belonging to J. F. Stolz, the Chief mentioned in the header.

cc: R. W. Starostecki, Region I

P. Beckhan,
Operator Licensing Branch
Washington, D. C. 20555