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June 6, 1983

Mr. A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Limerick Generating Station, Units 1&2
Response to Question (RAI) 430.48

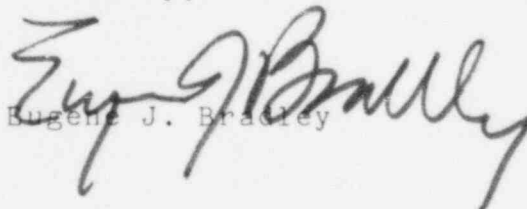
Reference: Power Systems Branch and Philadelphia
Electric Company Conference Calls on
May 19 and May 25, 1983

File: GOVT 1-1 (NRC)

Dear Mr. Schwencer:

The attached document is a revised draft response to Power Systems Branch Question 430.48. The draft response will be incorporated into the FSAR revision scheduled for July, 1983.

Sincerely,


Eugene J. Bradley

RJS/gra/12

Copy to: See Attached Service List

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cc: Judge Lawrence Brenner	(w/o enclosure)
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Atomic Safety and Licensing Board Panel	(w/o enclosure)
Docket and Service Section	(w/o enclosure)

DRAFTQUESTION 430.48 (Section 8.3)

Provide a detailed discussion (or plan) of the level of training proposed for your operators, maintenance crew, quality assurance, and supervisory personnel responsible for the operation and maintenance of the emergency diesel generators. Identify the number and type of personnel that will be dedicated to the operations and maintenance of the emergency diesel generators and the number and type that will be assigned from your general plant operations and maintenance groups to assist when needed.

In your discussion identify the amount and kind of training that will be received by each of the above categories and the type of ongoing training program planned to assure optimum availability of the emergency generators.

Also discuss the level of education and minimum experience requirements for the various categories of operations and maintenance personnel associated with emergency diesel generators.

RESPONSE*INSERT (A) next pg*

For conducting all diesel operations and operational maintenance, Limerick will use only plant operators (PO), with the exception of control room operations conducted by control operators (CO) and assistant control operators (ACO). There will be no operators dedicated to diesel operations to the exclusion of other responsibilities. ~~The aforementioned operators will be trained in appropriate diesel generator operations as part of the normal qualification program for these positions.~~ The number of available POs will be the shift complement of two supplemented by overtime as required. The level of education and experience is defined by the PO position. Most, if not all, of the initial POs will be simulator certified, and many may be RO licensed. Qualification programs for the PO position have not yet been developed but are expected to be similar to programs now in use at Peach Bottom.

Philadelphia Electric Company uses a centralized maintenance concept. Maintenance personnel assigned to Limerick are supplemented when needed (for personnel or for particular areas of expertise) by the centralized group. In addition, maintenance engineers assigned to the centralized group are available. This concept permits the system-wide experience and training of the centralized personnel to be applied at Limerick.

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PECo will provide a diesel generator training program similiar to vendor programs (formal classroom training and on-the-job training) for the aforementioned operating personnel. This training coupled with the availability of approved operating and test procedures and alarm response cards will enable operating personnel to respond appropriately to diesel generator problems. Operating personnel are instructed to perform activities in accordance with these procedures, which are based on manufacturer's recommendations. Plant procedures involve checking various diesel generator operating parameters during standby and operating conditions.

INSERT (A) pg 430.48-1

INSERT (A) next pg
LGS FSAR

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Maintenance personnel are not dedicated to particular equipment items. Maintenance supervision is responsible for the assignment of personnel in the required crafts who are capable of performing an identified task. The PECO Maintenance Division provides a variety of craft training classes to ensure the availability of qualified craftsmen. If contractor personnel should be used under PECO supervision, such personnel would be members of the building trades crafts.

INSERT (B) next pg.

Maintenance activities will be supervised by personnel who are appropriately qualified by experience or training for the work being performed. Maintenance Division personnel will have benefited from experience obtained as a result of Peach Bottom Atomic Power Station diesel generator maintenance activities using approved maintenance procedures and from the technical expertise of manufacturer's service representatives. This experience should provide competency equivalent to that provided by vendor training programs.

INSERT (C) next Pg.

(A) Activities beyond the responsibilities assigned to operating personnel are referred to plant technical personnel and/or maintenance personnel permanently assigned to the plant.

(B) Table 430.48-1 indicates the progression and training received in various positions.

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Table 430.48-1

Maintenance Division Graft Progression and Training

Position	Prerequisite for entry into Position	Training received While in Position	Appr. time in Position
Helper	Pass Maint Div. Aptitude Test Battery	OTJ - 2 month rotations among all trades	24 months
3rd Class	Pass 3rd Class Qual. Exam (not trade specific)	9-12 weeks classroom remainder OTJ	7 months
2nd Class	Pass 2nd Class Qual. Exam (trade specific)	3-5 weeks classroom or field	8 months
1st Class	Pass 1st Class Qual. Exam (trade specific)	OTJ	12 months
Subforeman	Pass Qual. Exam for subforeman	----	-----

(C) INSERTS FOR PG. 430.48-2