

PHILADELPHIA ELECTRIC COMPANY

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V. S. BOYER
SR. VICE PRESIDENT
NUCLEAR POWER

JUL 23 1984

54-352/353

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: Limerick Generating Station, Units 1 and 2
NRC Review of Limerick Risk Assessment

REFERENCE: Letter: H. R. Denton to V. S. Boyer,
dated June 7, 1984

Dear Mr. Denton:

We appreciate your providing us with suggested insights relating to the use of risk methodology during Limerick Generating Station operation. We concur that probabilistic risk assessment methodology has been, and can continue to be, helpful in highlighting those aspects of design and operation which are particularly important to reactor safety. As a result, Philadelphia Electric Company is evaluating ways in which risk assessment technology can be most effectively applied to the operation of Limerick Generating Station.

Our initial assessment has identified the following aspects of future PRA use:

- ° Philadelphia Electric Company will take steps to maintain and use the PRA methodology to develop safety and reliability insights.
- ° The continuing PRA maintenance and associated analyses will be an engineering function in support of both operations and engineering activities.
- ° Operating personnel will use the results and will have the authority to request non-routine analyses or studies from the engineering service organization.
- ° The primary quantitative measure of safety impacts would be core melt frequency due to internal initiators.
- ° The insights gained through probabilistic analysis will be disseminated throughout our existing organization, which has effectively assured safety and quality over the years.

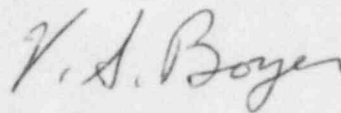
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We have engaged a consultant to identify alternate ways in which we can use risk assessment at Limerick. We will review the results in combination with additional information, including the insights you have provided, and will establish an ongoing scope of work which incorporates the items highlighted above. Our plans will include periodic reevaluations to assure that our resources are being expended effectively and that the results of ongoing rulemaking, research and experience of others are all reflected in our efforts.

We are hopeful that this report on the status of Philadelphia Electric Company's thinking in the area of continued use of PRA concepts is responsive to your June 7, 1984 letter.

Sincerely,

A handwritten signature in cursive script, appearing to read "V. A. Boyer".

ARD/dg/07128402

Copy to: See Attached Service List

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