

PHILADELPHIA ELECTRIC COMPANY

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JOHN S. KEMPER
VICE-PRESIDENT
ENGINEERING AND RESEARCH

June 26, 1985

Mr. Hugh L. Thompson, Jr., Director
Division of Licensing
Office of Nuclear Reactor Regulation
NRC, Washington, DC

Subject: Philadelphia Electric Company
Position on Generic Letter 85-07
Peach Bottom Atomic Power Station (50-277 & 50-278)
and Limerick Generating Station (50-352 & 50-353)

Dear Mr. Thompson:

Attached to this letter is our response to Generic Letter 85-07 in the format requested. In addition, we would like to amplify our response.

Philadelphia Electric Company is committed to a major corporate organizational change that will enhance our existing systems and methodology for managing the modification work at our nuclear generating facilities. As we select personnel, and establish the organization, to implement this change, we intend to make integrated scheduling a key element.

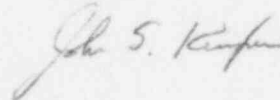
We feel that this is the appropriate time to initiate such a change since most of the major industry concerns, i.e., ATWS, Fire Protection, Mark I, Mark II, have been incorporated into both Peach Bottom and Limerick. We now expect to have a few years without the press of major regulatory backfit requirements to establish our improved organization.

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As noted in your Enclosure 2, we plan to schedule the selection of our methodology in September of 1986 with a schedule for submittal to the NRC in December of 1986. The effort required to bring Limerick Unit 1 to Commercial Operation and the completion of major modifications at Peach Bottom have seriously impaired our efforts to make organization changes and develop the integrated schedule concept. However, we support the concept and look forward to working with your staff in its implementation.

Very truly yours,

A handwritten signature in cursive script, appearing to read "John S. Karpman".

DBF/mtk/05298503

ENCLOSURE 2

RESPONSE FORMAT - GENERIC LETTER 85-07

PLANT NAME: Peach Bottom Atomic Power Station Units 2 & 3

UTILITY: Philadelphia Electric Company

I. INTENTIONS

- A. Intend to work with the staff to develop an ILS X
- B. Have reservations that must be resolved before developing ILS
- C. Do not presently intend to negotiate an ILS with the staff
- D. Plan to implement an informal ILS only

II. STATUS

A. If you answered I.A above:

1. Have you settled on a method for prioritizing the work at your plant(s)?

Circle One: Yes No

If yes, select best description:

Engineering Judgement

Analytic Hierarchy process

Risk based analysis

Cost-benefit analysis

Other (please describe)

If no, provide estimated date for selecting a methodology:

 Date

or

If not presently available provide estimated date for scheduling the selection of a methodology: Sept. 1986

2. What is your estimated date for making a submittal to the NRC -

or

If not presently available, planned date for scheduling a submittal to the NRC Dec. 1986

B. If you answered I.B above:

1. Please explain your reservations on separate sheet(s) or provide your schedule for supplying an explanation

See separate sheet(s): _____

or

Separate submittal scheduled for _____

(Date)

2. If available to meet with the staff to discuss your concerns, propose a time frame for such a meeting and provide a contact that can make arrangements

Contact/Time Frame _____

Phone Number _____

C. If you answered I.C

1. Would you be willing to meet with the staff to discuss the development of an ILS for your facility(s)?

Circle One: Yes No

If yes, propose a time frame for such a meeting and provide a contact that can made arrangements.

Contact _____

Time Frame _____

Phone Number _____

If no, any constructive comments you have would be appreciated.

III. ADDITIONAL ITEMS

Please make any suggestions you may have as to how a utility sponsored availability/reliability project might be credited for plant safety enhancement. Provide additional constructive comments as appropriate.

ENCLOSURE 2

RESPONSE FORMAT - GENERIC LETTER 85-07

PLANT NAME: Limerick Generating Station, Units 1 & 2

UTILITY: Philadelphia Electric Company

I. INTENTIONS

- A. Intend to work with the staff to develop an ILS X
- B. Have reservations that must be resolved before developing ILS
- C. Do not presently intend to negotiate an ILS with the staff
- D. Plan to implement an informal ILS only

II. STATUS

A. If you answered I.A above:

1. Have you settled on a method for prioritizing the work at your plant(s)?

Circle One: Yes No

If yes, select best description:

Engineering judgement
Analytic Hierarchy process
Risk based analysis
Cost-benefit analysis
Other (please describe)

If no, provide estimated date for selecting a methodology:
Date

or

If not presently available provide estimated date for scheduling the selection of a methodology: Sept. 1986

2. What is your estimated date for making a submittal to the NRC -

or

If not presently available, planned date for scheduling a submittal to the NRC Dec. 1986

B. If you answered I.B above:

1. Please explain your reservations on separate sheet(s) or provide your schedule for supplying an explanation

See separate sheet(s): _____

or

Separate submittal scheduled for _____

(Date)

2. If available to meet with the staff to discuss your concerns, propose a time frame for such a meeting and provide a contact that can make arrangements

Contact/Time Frame _____

Phone Number _____

C. If you answered I.C

1. Would you be willing to meet with the staff to discuss the development of an ILS for your facility(s)?

Circle One: Yes No

If yes, propose a time frame for such a meeting and provide a contact that can made arrangements.

Contact _____

Time Frame _____

Phone Number _____

If no, any constructive comments you have would be appreciated.

III. ADDITIONAL ITEMS

Please make any suggestions you may have as to how a utility sponsored availability/reliability project might be credited for plant safety enhancement. Provide additional constructive comments as appropriate.