

# PHILADELPHIA ELECTRIC COMPANY

LIMERICK GENERATING STATION

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GRAHAM M. LEITCH  
VICE PRESIDENT  
LIMERICK GENERATING STATION

January 10, 1990

Docket Nos. 50-352  
50-353

License Nos. NPF-39  
NPF-85

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

SUBJECT: Limerick Generating Station, Units 1 and 2  
Systematic Assessment of Licensee Performance  
Board Report No. 50-352/88-99; 50-353/88-99  
Submittal of Written Comments

Gentlemen:

NRC letter dated December 1, 1989, transmitted the NRC's Systematic Assessment of Licensee Performance (SALP) Board Report which provided an assessment of our Limerick Generating Station (LGS), Units 1 and 2, for the period May 1, 1988 through August 31, 1989. We then met with NRC representatives on December 21, 1989 at the LGS site, to discuss the Board Report assessments and our plans to correct the identified weaknesses. At that time, we stated that we would respond to the Board Report by January 10, 1990. Accordingly, this letter provides our written comments regarding the SALP Board Report by summarizing our presentations at the December 21, 1989 meeting.

Overall, we concur with the SALP Board's assessment of activities at LGS. We find that the Board Report accurately recognizes not only our successful efforts to achieve "world class" performance, but the effectiveness of the corrective actions which are underway to strengthen identified weaknesses as well. Specifically, in the Emergency Preparedness (EP) area we have developed a long-term corrective action plan based on the recommendations of our management root cause assessment team. We are now in the process of implementing the long-term Management Plan that we first discussed with the NRC on July 6, 1989, and

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subsequently provided an updated status report during our meeting at the NRC Region I offices on October 23, 1989. While our immediate corrective actions re-established compliance with EP regulatory requirements, the current implementation of our long-term plan includes maintaining strong senior management oversight, improving communications between corporate management and the EP staffs at the site and the corporate office, increased EP staffing, an elevated site EP reporting level, and EP training improvements. As stated at both the October 23, 1989 and December 21, 1989 meetings, we plan to meet with the NRC in April, 1990, to present the status of our long-term plan. We would be ready for the NRC to conduct an assessment of the improvements of our EP program at that time.

In the Engineering/Technical Support area, we presented the findings and recommendations of our root cause assessment of some weaknesses in the routine engineering support of LGS at our meeting with the NRC on September 27, 1989. We also note the SALP Board's comment concerning the lack of critical self-assessment by Nuclear Engineering Department (NED) management. Accordingly, a number of corrective actions have been initiated and, in some cases, completed. These include strengthening the NED presence on site and increasing the involvement of NED personnel in site activities and publishing a quality expectations document. The NED has also been reorganized so as to provide a better "operating plant" support focus, is conducting self-evaluations and performance monitoring, and has expanded the training provided to NED personnel. As stated at the December 21, 1989 meeting, we will be ready to present our overall corrective action implementation plan, which will address the findings and recommendations of the root cause assessment, to the NRC in March, 1990.

Lastly, we plan to continue the self-assessment process that was conducted during the Unit 2 Power Ascension Program. This self-assessment of station operations will be performed on a quarterly basis through 1990, and the process will be re-evaluated at the end of the year. We plan to present the interim results of this self-assessment during the next LGS mid-cycle SALP meeting with the NRC at a date to be arranged.

If you have any questions, or need additional information, please contact us.

Very truly yours,



cc: W. T. Russell, Administrator, Region I, USNRC  
T. J. Kenny, USNRC Senior Resident Inspector, LGS

