

PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

955-65 CHESTERBROOK BLVD.

WAYNE, PA 19087-5691

(215) 640-6000

March 12, 1990

Docket Nos. 50-277
50-278
50-352
50-353

License Nos. DPR-44
DPR-56
NPF-39
NPF-85

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

SUBJECT: Peach Bottom Atomic Power Station, Units 2 and 3
Limerick Generating Station, Units 1 and 2
Response to Generic Letter 90-01, "Request for Voluntary
Participation in NRC Regulatory Impact Survey"

Dear Sir:

NRC Generic Letter (GL) 90-01, "Request for Voluntary Participation in NRC Regulatory Impact Survey," dated January 18, 1990, requested licensees to voluntarily participate in a regulatory impact survey.

In order to participate in this survey, Philadelphia Electric Company is providing the requested information for the Peach Bottom Atomic Power Station (PBAPS) and the Limerick Generating Station (LGS) on the enclosed Generic Letter Questionnaire Sheets. We have completed these sheets in accordance with recently received guidance from the Nuclear Utility Management and Resources Council (NUMARC).

If you have any additional questions, please feel free to contact us.

Sincerely yours,

G. A. Hunger, Jr.

G. A. Hunger, Jr.
Director

Licensing Section
Nuclear Services Department

Enclosures

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

9003200456 900312
PDR ADOCK 05000277
P FDC

A000
1/1

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation:

NRC Team Inspections (PBAPS restart)

2. Based on actual experience over the past several years, about how often is this activity conducted?

Over last (2) years averaged (5) inspections per year

3. Operations/Construction areas covered: N/A

4. Extent of the activity (how many people, for how long)

9 inspectors on site for 3 weeks

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

- a. Plant Department Heads 240 hr/person (number involved) 4
- b. Plant Manager 120 hr
- c. Corporate Department Heads 168 hr/person (number involved) 7
- d. Corporate Vice Presidents 168 hr/person (number involved) 2
- e. Chief Nuclear Officer 48 hr
- f. Other Managers and Supervisors 240 hr/person (number involved) 15

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation:

NRC Team inspections (LGS Unit 2 Independent Design and Construction Assessment Team)

2. Based on actual experience over the past several years, about how often is this activity conducted?

Once during LGS unit 2 startup/construction phase

3. Operations/Construction areas covered: NA

4. Extent of the activity (how many people, for how long)

7 inspectors for 1 week

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

- | | | | |
|-----------------------------------|---------------------|-------------------|----------|
| a. Plant Department Heads | <u>24 hr</u> | (number involved) | <u>1</u> |
| b. Plant Manager | <u>24 hr</u> | | |
| c. Corporate Department Heads | <u>48 hr/person</u> | (number involved) | <u>3</u> |
| d. Corporate Vice Presidents | <u>24 hr</u> | (number involved) | <u>1</u> |
| e. Chief Nuclear Officer | <u>2</u> | | |
| f. Other Managers and Supervisors | <u>24 hr/person</u> | (number involved) | <u>3</u> |

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation:

NRC Team Inspection (LGS Maintenance Team)

2. Based on actual experience over the past several years, about how often is this activity conducted?

1 inspection performed

3. Operations/Construction areas covered: N/A

4. Extent of the activity (how many people, for how long)

6 inspectors on site for 2 weeks

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

- a. Plant Department Heads 48 hr/person (number involved) 4
- b. Plant Manager 24 hr
- c. Corporate Department Heads 24 hr (number involved) 3
- d. Corporate Vice Presidents 24 hr (number involved) 1
- e. Chief Nuclear Officer 4
- f. Other Managers and Supervisors 48 hr/person (number involved) 6

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation:

NRC Team Inspection (LGS Unit 2 Operational Readiness)

2. Based on actual experience over the past several years, about how often is this activity conducted?

1 inspection performed

3. Operations/Construction areas covered: N/A

4. Extent of the activity (how many people, for how long)

Four inspectors on site for 1 week

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

- | | | |
|----|--|----------------------------|
| a. | Plant Department Heads <u>24 hr/person</u> | (number involved) <u>4</u> |
| b. | Plant Manager <u>24 hr</u> | |
| c. | Corporate Department Heads <u>24 hr</u> | (number involved) <u>3</u> |
| d. | Corporate Vice Presidents <u>24 hr</u> | (number involved) <u>1</u> |
| e. | Chief Nuclear Officer <u>2</u> | |
| f. | Other Managers and Supervisors <u>24 hr/person</u> | (number included) <u>4</u> |

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation:

Other NRC Resident, Regional and Headquarters Inspection/Audits at PBAPS

2. Based on actual experience over the past several years, about how often is this activity conducted?

NRC Residents; continuous coverage

NRC Regional; 1 inspection per month

3. Operations/Construction areas covered: N/A

4. Extent of the activity (how many people, for how long)

NRC Resident = 3 inspectors continuous coverage

NRC Regional = typically 2 inspectors on site for 1 week

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

a. Plant Department Heads 200 hr/person (number involved) 4

b. Plant Manager 240 hr

c. Corporate Department Heads 24 hr/person (number involved) 5

d. Corporate Vice Presidents 120-192 hr/person (number involved) 2

e. Chief Nuclear Officer 24 hr

f. Other Manager and Supervisors 120-216 hr/person (number included) 15

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation:
Other NRC Resident, Regional and Headquarters Inspection/Audits at LGS
2. Based on actual experience over the past several years, about how often is this activity conducted?
NRC Resident; continuous coverage
NRC Regional; 20-25 inspections per year
3. Operations/Construction areas covered: N/A
4. Extent of the activity (how many people, for how long)
NRC Resident = 3 inspectors continuous coverage
NRC Regional = 2 inspectors on site for 1 week
5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 211 hr/person (number involved) 6
 - b. Plant Manager 240 hr
 - c. Corporate Department Heads 24 hr/person (number involved) 5
 - d. Corporate Vice Presidents 120-192 hr/person (number involved) 2
 - e. Chief Nuclear Officer 24 hr
 - f. Other Manager and Supervisors 120-216 hr/person (number included) 15

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation:

INPO Evaluations

2. Based on actual experience over the past several years, about how often is this activity conducted?

Once per year at both PBAPS and LGS

3. Operations/Construction areas covered: N/A

4. Extent of the activity (how many people, for how long)

10 inspectors for 2 weeks

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

- a. Plant Department Heads 96 hr/person (number involved) 6 per site
- b. Plant Manager 96 hr
- c. Corporate Department Heads 48 hr/person (number involved) 6
- d. Corporate Vice Presidents 48 hr/person (number involved) 3
- e. Chief Nuclear Officer 24 hr
- f. Other Managers and Supervisors 72 hr/person (number involved) 16

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation:

Insurers - American Nuclear Insurers (ANI) inspections at PBAPS

2. Based on actual experience over the past several years, about how often is this activity conducted?

Nuclear Liability = 2 inspections/year

Fire Inspections = 2 inspections/year

PSM Inspections = quarterly

3. Operations/Construction areas covered:

Liability = chemistry/maintenance

Fire = combustibles

PSM = pressure vessel

4. Extent of the activity (how many people, for how long)

Liability = 3 inspectors for 3 days

Fire = 1 inspector for 3 days

PSM = 1 inspector routinely on site

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

a. Plant Department Heads 24 hr/person (number involved) 4

b. Plant Manager 24 hr

c. Corporate Department Heads 24 hr/person (number involved) 3

d. Corporate Vice Presidents 24 hr/person (number involved) 2

e. Chief Nuclear Officer 4

f. Other Managers and Supervisors 24 hr/person (number involved) 2

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation:

Insurers - ANI inspections at LGS

2. Based on actual experience over the past several years, about how often is this activity conducted?

1 inspection per year

3. Operations/Construction areas covered:

Liability = chemistry/maintenance

Fire = combustibles

PSM = pressure vessel certification

4. Extent of the activity (how many people, for how long)

2 inspections for 1 week

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

a. Plant Department Heads 24 hr/person (number involved) 2

b. Plant Manager 24 hr

c. Corporate Department Heads 24 hr/person (number involved) 3

d. Corporate Vice Presidents 24 hr/person (number involved) 2

e. Chief Nuclear Officer 4

f. Other Managers and Supervisors 24 hr/person (number involved) 2

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation:

Environmental Protection Agency (EPA) Inspections at PBAPS

2. Based on actual experience over the past several years, about how often is this activity conducted?

4 inspections/visits a year

3. Operations/Construction areas covered:

Hazardous/Radwaste; Asbestos removal

4. Extent of the activity (how many people, for how long)

1-2 inspectors for 1-2 hours

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

- | | |
|---|----------------------------|
| a. Plant Department Heads <u>48 hr</u> | (number involved) <u>1</u> |
| b. Plant Manager <u>24 hr</u> | |
| c. Corporate Department Heads <u>24 hr/person</u> | (number involved) <u>2</u> |
| d. Corporate Vice Presidents <u>24 hr/person</u> | (number involved) <u>2</u> |
| e. Chief Nuclear Officer <u>1</u> | |
| f. Other Managers and Supervisors <u>-</u> | (number involved) <u>-</u> |

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation:

EPA Inspections at LGS

2. Based on actual experience over the past several years, about how often is this activity conducted?

1 inspection visit per year

3. Operations/Construction areas covered:

Hazardous/Radwaste

4. Extent of the activity (how many people, for how long)

2-3 inspectors for 1 week

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

- | | |
|---|----------------------------|
| a. Plant Department Heads <u>48 hr</u> | (number involved) <u>1</u> |
| b. Plant Manager <u>24 hr</u> | |
| c. Corporate Department Heads <u>24 hr/person</u> | (number involved) <u>2</u> |
| d. Corporate Vice Presidents <u>24 hr/person</u> | (number involved) <u>2</u> |
| e. Chief Nuclear Officer <u>1</u> | |
| f. Other Managers and Supervisors <u>-</u> | (number involved) <u>-</u> |

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation:

Occupational Safety and Health Administration (OSHA) Inspections

2. Based on actual experience over the past several years, about how often is this activity conducted?

0-3 visits per year at Peach Bottom - none to date at Limerick

3. Operations/Construction areas covered:

Investigate safety concerns

4. Extent of the activity (how many people, for how long)

2 inspectors on site for 6 days

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

- | | |
|--|----------------------------|
| a. Plant Department Heads <u>48 hr</u> | (number involved) <u>1</u> |
| b. Plant Manager <u>24 hr</u> | |
| c. Corporate Department Heads <u>48 hr</u> | (number involved) <u>1</u> |
| d. Corporate Vice Presidents <u>-</u> | (number involved) <u>-</u> |
| e. Chief Nuclear Officer <u>0</u> | |
| f. Other Managers and Supervisors <u>-</u> | (number involved) <u>-</u> |

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation:

Department of Transportation (DOT) Inspections

2. Based on actual experience over the past several years, about how often is this activity conducted?

1 per year at Limerick, none at Peach Bottom in last several years

3. Operations/Construction areas covered:

Radwaste; Health Physics; Chemistry; Inspection of vendors trucks

4. Extent of the activity (how many people, for how long)

1-3 inspectors on site for up to 1 week

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

- | | |
|--|----------------------------|
| a. Plant Department Heads <u>24 hr</u> | (number involved) <u>1</u> |
| b. Plant Manager <u>-</u> | (number involved) <u>-</u> |
| c. Corporate Department Heads <u>-</u> | (number involved) <u>-</u> |
| d. Corporate Vice Presidents <u>-</u> | (number involved) <u>-</u> |
| e. Chief Nuclear Officer <u>0</u> | (number involved) <u>-</u> |
| f. Other Managers and Supervisors <u>-</u> | (number involved) <u>-</u> |

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation:

State/Local authorities visits at PBAPS

2. Based on actual experience over the past several years, about how often is this activity conducted?

Weekly

3. Operations/Construction areas covered:

All areas

4. Extent of the activity (how many people, for how long)

4 people on site for 2-4 hours

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

- | | |
|---|----------------------------|
| a. Plant Department Heads <u>48 hr/person</u> | (number involved) <u>2</u> |
| b. Plant Manager <u>24 hr</u> | |
| c. Corporate Department Heads <u>24 hr</u> | (number involved) <u>1</u> |
| d. Corporate Vice Presidents <u>-</u> | (number involved) <u>-</u> |
| e. Chief Nuclear Officer <u>4</u> | |
| f. Other Managers and Supervisors <u>-</u> | (number involved) <u>-</u> |

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation:

State/Local authorities visit at LGS

2. Based on actual experience over the past several years, about how often is this activity conducted?

Weekly

3. Operations/Construction areas covered:

All areas

4. Extent of the activity (how many people, for how long)

1 person for 2 hours

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

- | | |
|--|----------------------------|
| a. Plant Department Heads <u>24 hr</u> | (number involved) <u>1</u> |
| b. Plant Manager <u>24 hr</u> | |
| c. Corporate Department Heads <u>24 hr</u> | (number involved) <u>1</u> |
| d. Corporate Vice Presidents <u>-</u> | (number involved) <u>-</u> |
| e. Chief Nuclear Officer <u>4</u> | |
| f. Other Managers and Supervisors <u>-</u> | (number involved) <u>-</u> |

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation:

NRC required QA Audits performed at PBAPS

2. Based on actual experience over the past several years, about how often is this activity conducted?

40 audits per year

3. Operations/Construction areas covered: N/A

4. Extent of the activity (how many people, for how long)

11 auditors for 1 month

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

- | | |
|---|----------------------------|
| a. Plant Department Heads <u>72 hr/person</u> | (number involved) <u>4</u> |
| b. Plant Manager <u>24 hr</u> | |
| c. Corporate Department Heads <u>24 hr</u> | (number involved) <u>1</u> |
| d. Corporate Vice Presidents <u>48-96 hr/person</u> | (number involved) <u>2</u> |
| e. Chief Nuclear Officer <u>2</u> | |
| f. Other Managers and Supervisor <u>-</u> | (number involved) <u>-</u> |

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation:

NRC required QA Audits performed at LGS

2. Based on actual experience over the past several years, about how often is this activity conducted?

28-32 audits per year

3. Operations/Construction areas covered: N/A

4. Extent of the activity (how many people, for how long)

10 auditors for 1 month

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

- | | |
|---|----------------------------|
| a. Plant Department Heads <u>72 hr/person</u> | (number involved) <u>4</u> |
| b. Plant Manager <u>48 hr</u> | |
| c. Corporate Department Heads <u>24 hr</u> | (number involved) <u>1</u> |
| d. Corporate Vice Presidents <u>48-96 hr/person</u> | (number involved) <u>2</u> |
| e. Chief Nuclear Officer <u>2</u> | |
| f. Other Managers and Supervisor <u>-</u> | (number involved) <u>-</u> |