

# PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

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DAVID R. HELWIG  
VICE PRESIDENT  
NUCLEAR SERVICES

April 27, 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 NRC Generic Letter 87-07, "Information Transmittal  
of Final Rulemaking for Revisions to Operator Licensing -  
10 CFR 55 and Conforming Amendments"

Gentlemen:

This letter provides the Philadelphia Electric Company response to Generic Letter 87-07, dated March 19, 1987. This Generic Letter response was not submitted due to an oversight which was recently brought to our attention by the Nuclear Regulatory Commission.

Generic Letter 87-07 states that "...because of conflicts between previous 10CFR55 Appendix A requirements and a systems approach to requalification training, it is necessary to certify that the substitute training program is both accredited and based upon a systems approach to training..."

Philadelphia Electric Company certifies that the Peach Bottom Atomic Power Station Licensed Operator Requalification Training Program was initially INPO accredited on May 23, 1985 and renewed June 22, 1989, and is based upon a systems approach to training.

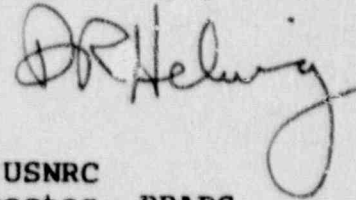
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Additionally, we certify that the Limerick Generating Station Licensed Operator Requalification Training Program was initially INPO accredited on October 30, 1988 and renewed January 25, 1990, and is based upon a systems approach to training.

If you have any questions, or require additional information, please do not hesitate to contact us.

Very truly yours,



Attachment

cc: T. T. Martin, Administrator, Region I, USNRC  
J. J. Lynch, USNRC Senior Resident Inspector, PBAPS  
T. J. Kenny, USNRC Senior Resident Inspector, LGS



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

ATTACHMENT

MAR 19 1987

TO ALL FACILITY LICENSEES

SUBJECT: INFORMATION TRANSMITTAL OF FINAL RULEMAKING  
FOR REVISIONS TO OPERATOR LICENSING -  
10 CFR 55 AND CONFORMING AMENDMENTS  
(Generic Letter No. 87-07)

To provide information about the final revisions to 10 CFR 55, "Operators' Licenses," and their implementation, the Commission is holding a series of public meetings. These meetings will be held as follows:

- A. April 9, 1987 for Region II  
Richard B. Russell Federal Building  
Strom Auditorium, Lower Level  
75 Spring Street, SW  
Atlanta, Georgia  
Point of Contact: Mr. Kenneth E. Brockman  
US Nuclear Regulatory Commission, Region II  
101 Marietta Street, Suite 3100  
Atlanta, GA 30323  
(404) 331-5594
- B. April 14, 1987 for Regions IV and V  
Stouffer Concourse Hotel  
3801 Quebec Street  
Denver, Colorado (Across from Stapleton Airport)  
Points of Contact: Mr. Ralph Cooley  
US Nuclear Regulatory Commission, Region IV  
Parkway Central Plaza Building  
611 Ryan Plaza Drive, Suite 1000  
Arlington, TX 76011  
(817) 860-8147
- Mr. Phillip Morrill  
US Nuclear Regulatory Commission, Region V  
1450 Maria Lane, Suite 210  
Walnut Creek, CA 94596  
(415) 943-3740
- C. April 16, 1987 for Region III  
Ramada Hotel O'Hare  
6600 N. Mannheim Road (corner of Higgins)  
Rosemont, Illinois (One mile from O'Hare Airport)  
Phone: (312) 827-5131  
Point of Contact: Mr. Thomas Burdick  
US Nuclear Regulatory Commission, Region III  
799 Roosevelt Road  
Glen Ellyn, IL 60137  
(312) 790-5566

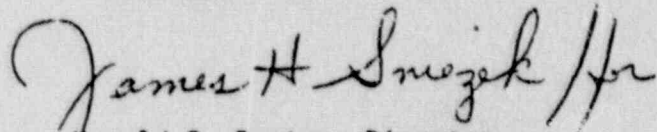
(ZPP)

D. April 20, 1987 for Region I  
Hilton Hotel Valley Forge  
251 West DeKalb Pike  
King of Prussia, Pennsylvania  
Phone: (215) 337-1200  
Point of Contact: Mr. Noel F. Dudley  
US Nuclear Regulatory Commission, Region I  
631 Park Avenue  
King of Prussia, PA 19406  
(215) 337-5211

Enclosed with this letter is a double-spaced copy of the regulations and supporting information for your review prior to the public meeting. You are encouraged to forward questions to the appropriate point-of-contact, one week prior to the date of the meeting which you plan to attend. The staff intends to answer these questions and others during the meetings and will consolidate all questions and answers into a NUREG report after the meeting.

In preparation for these meetings, all licensees should pay special attention to the requirements of Sections 55.31(a) and 55.59(c) regarding both initial and requalification training and the option of substituting an accredited training program for initial and requalification training programs previously approved by NRC. This option may be implemented upon written notification to the NRC and does not require any staff review. However, because of conflicts between previous 10CFR55 Appendix A requirements and a systems approach to requalification training, it is necessary to certify that the substitute training program is both accredited and based upon a systems approach to training. The superseded training program description contained in the FSAR need not be revised until the next update required by 50.71(e).

Sincerely,

  
Harold R. Denton, Director  
Office of Nuclear Reactor Regulation

Enclosure:  
As stated