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SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

January 9, 1980

RE: Docket Nos.: 50-277
50-278

Inspection Nos.: 50-277/79-27
50-278/79-30

Mr. George H. Smith, Chief
Fuel Facility and Materials Safety Branch
US Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Smith:

This letter is in response to combined Inspection Report 50-277/79-27 and 50-278/79-30 dated December 21, 1979. Appendix A to your letter addresses two items as not appearing to be in full compliance with Nuclear Regulatory Commission requirements. Both items are categorized as infractions. They are restated with our responses.

- A. 10 CFR 50, Appendix B, Criterion VI states in part "Measures shall be established to control the issuance of documents, such as instructions, procedures, and drawings, including changes thereto... these measures shall assure that documents... are distributed to and used at the location where the activity is performed. The licensees NRC accepted Quality Assurance Plan, Volume III, Section 2, paragraph 6.1 states in part "documents, including changes... are distributed to and used at the location where the prescribed activity is performed."

Contrary to the above requirements current revisions of radwaste procedures S.10.4.1.B and S.10.4.1.C were not distributed to and used at the radwaste panel, the

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location at which the activities described in the procedures were performed.

Response

Current revisions to the procedures mentioned in this item were not subject to controlled distribution to the radwaste control room area. Therefore, some of these procedures may have been misplaced or never incorporated into the procedure book in this location. To correct this situation, the radwaste control room has been placed on the controlled distribution list for appropriate radwaste procedures (S.10.3 and S.10.4 series). This mechanism will insure that the most current revisions of the above mentioned procedures are promptly placed in the procedure book.

- B. Technical Specification 6.8.1 requires that "Written procedures and administrative policies shall be established, implemented and maintained that meet the requirements of Section 5.1 and 5.3 of ANSI N18.7-1972 and Appendix "A" of USAEC Regulatory Guide 1.33."

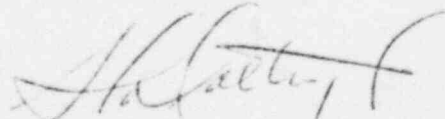
Licensee procedures S.10.4.1.B and S.10.4.1.C, each developed pursuant to Technical Specification 6.8.1, require that a check-off list be completed in the initial step of the procedure.

Contrary to the above requirement the activities described in the procedures were performed on several occasions in October 1979, including October 31, and no check-off lists were completed.

Response

An indepth review of procedures S.10.4.1.B and S.10.4.1.C was performed to determine whether the check-off list should be completed each time that the procedure is implemented. It has been determined that there is no technical reason for the check-off lists to be completed each time the procedures are to be used since the equipment is used on a daily basis and in some cases more than once during some operating shifts. The operator who performs these functions receives direction from the previous shift operator regarding the status of these items. Completion of the check-off lists is not necessary for operation of the system, therefore, the requirement to complete the check-off lists has been deleted from the procedures.

Very truly yours,

A handwritten signature in cursive script, appearing to read "H. Smith", is written over the typed name "Very truly yours,".