

# PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-5001

SHIELDS L. DALTROFF  
VICE PRESIDENT  
ELECTRIC PRODUCTION

December 5, 1978

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

Inspection No.: 50-277/78-25  
50-278/78-30

Mr. Eldon J. Brunner, Chief  
Reactor Operations & Nuclear Support Branch  
U.S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

Dear Mr. Brunner:

Your letter of November 14, 1978, forwarded combined Inspection Report 50-277/78-25 and 50-278/78-30. Appendix A to your letter lists one activity which did not appear to be in conformance with Nuclear Regulatory Commission requirements. This item is an Infraction and is listed below with our response.

- A. Technical Specification 6.5.2.8, states in part,  
"Audits of facility activities shall be performed under the cognizance of the O&SR (Operation and Safety Review) Committee. These audits shall encompass:  
...c) The results of all actions taken to correct deficiencies occurring in facility equipment, structures, systems, or method of operation that affect nuclear safety at least once per six months  
..."

7901020078'

Contrary to the above, the audits performed by the O&SR Committee during 1976-1978 did not constitute performance of the specified audit at least once per six months in that:

- The interval between the last two performances of each audit was between nine and twelve months; and,
- Seven of the eight audits most recently performed were last completed during the period November 16, 1977 - January 4, 1978.

Response

The Operations and Safety Review (O&SR) Committee has always been aware of the auditing requirement of Technical Specification 6.5.2.8.c and has been fulfilling it by reviewing actions taken to correct deficiencies occurring in facility equipment, structures, systems, or method of operation that affects nuclear safety during each regular meeting. The regular meetings are held no less frequently than once per six months. Furthermore, the Operation and Safety Review Committee is presently conducting audits as delineated by the Nuclear Audit Plan. These audits include "actions taken to correct deficiencies...".

In order to improve availability of the records of these audits, however, the Nuclear Audit Plan has been amended to include a separate audit specifically covering "actions taken to correct deficiencies." This audit will be performed at least once per six months. The Quality Assurance Division has been assigned this responsibility, under the cognizance of the O&SR Committee, with their first audit scheduled for completion by January 31, 1979.

Very truly yours,

