



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
631 PARK AVENUE
KING OF PRUSSIA, PENNSYLVANIA 19406
SEP 15 1980

Docket Nos. 50-352
50-353

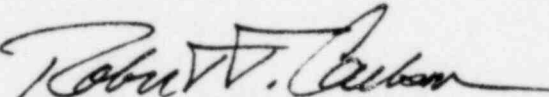
Philadelphia Electric Company
ATTN: Mr. John S. Kemper
Vice President
Engineering and Research
2301 Market Street
Philadelphia, Pennsylvania 19101

Gentlemen:

Subject: Combined Inspection 50-352/80-12; 50-353/80-10

Some copies of the subject inspection report may have been distributed without page 11. A copy of that page is enclosed with this letter.

Sincerely,


Robert T. Carlson, Chief
Reactor Construction and
Engineering Support Branch

Enclosure: As stated

cc w/encl:
V. S. Boyer, Senior Vice President, Nuclear Power

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- 1) The FCR's were complete and conformed to the required format.
- 2) The FCR's were adequately controlled in distribution, filing and retrievability.
- 3) All FCR's were approved by project and/or field engineering and contained adequate technical description of requested changes.

However, the inspector noticed that a substantial number of these documents contained corrections by "Wite-out" correcting fluid obliterating the previous information; also the new information entered onto them was not initialled and dated by the individual entering such information. A few FCR's also contained cut-outs from drawings pasted on them showing changes and other information. The inspector questioned the propriety of such practices on controlled permanent records. In response to the inspector's question, the licensee and the A/E's Resident Engineer replied that there are no provisions or rules on the project which specifically prohibit these practices; and they have been using these practices extensively on this project for a number of years. This item is unresolved pending further review. (352/80-12-06; 353/80-10-01)

- b. The inspector noticed that a substantial number of FCR's had been issued for only one specific condition. These FCR's had a note from design engineering indicating that the affected drawings would not be changed or revised to show the requested change. The inspector determined that it is currently not required that the approved FCR's be even referenced on the affected drawings. In response to the inspector's concern in this regard, the licensee and the A/E's Resident Engineer indicated that they have initiated a program in April 1980 which will reference all approved FCR's on the affected drawings. Therefore, any changes not incorporated in design will be readily traceable and retrievable for review and inspection during the plant life. However, the licensee's Quality Assurance Plan, Appendix W does not designate FCR's to be a life-time record. The FCR's are designated as a one-year record by the licensee. Therefore, the inspector determined that referencing of FCR's on affected drawings does not adequately satisfy the inspector's concern. A reference of an FCR on any drawing is of no value if the FCR itself will not be available for the life of the plant. This item is considered unresolved pending review of licensee's evaluation. (352/80-12-07)

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