

PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

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Docket Nos. 50-277
50-278

License Nos. DPR-44
DPR-56

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

SUBJECT: Peach Bottom Atomic Power Station, Units 2 and 3
Response to Request for Additional Information
Regarding Technical Specification Change Request for
Audit Report Distribution

- REFERENCE: (1) Letter from G. A. Hunger, Jr. (PECo)
to USNRC dated July 11, 1989
- (2) Letter from G. Y. Suh (NRC) to
G. A. Hunger, Jr. (PECo)
dated September 11, 1990

Dear Sir:

In Reference (1), Philadelphia Electric Company (PECo) submitted Technical Specification Change Request (TSCR) 88-06 which requested a revision to specification 6.5.2.10.c. In Reference (2), the NRC requested additional information related to the proposed change. The purpose of this letter is to provide the requested information.

Specification 6.5.2.10.c currently requires that Nuclear Review Board (NRB) audit reports be forwarded to the "Executive Vice President-Nuclear and the management positions responsible for the areas audited." PECo proposed that the specification be revised to require the audit reports forwarded to the "Corporate Officer(s) and the management positions responsible for the areas audited."

In Reference (2), the NRC states that the proposed change is not consistent with Standard Technical Specifications (STS). Our review of NUREG-0123, Revision 3 does not identify an inconsistency with our proposed specification. Specification 6.5.2.10.c of the STS requires audit reports to be forwarded to the "(Vice President-Operations) and to the management positions responsible for the

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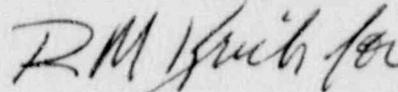
areas audited." Our Nuclear Group organization includes a Vice President, Peach Bottom Atomic Power Station (PBAPS), a Vice President, Nuclear Engineering and Services Department and a Vice President, Limerick Generating Station (LGS). All three report to the Senior Vice President-Nuclear. (This title was changed from the Executive Vice President-Nuclear.) Each of these positions is a Corporate Officer. The "(Vice President-Operations)" referred to in the STS corresponds to the Vice President, PBAPS. Because the NRB audit reports may encompass areas under more than one Vice President, the reference to "Corporate Officer(s)" was proposed. This allows both consistency with the STS and reflects the PECO organization.

In Reference (2), the NRC notes that the currently approved specification does not prohibit the audit reports from being forwarded to the appropriate Corporate Officers. Although this is correct, the proposed specification served two purposes: 1) to require that the appropriate Corporate Officer receives audit reports and 2) to eliminate the requirement for the Senior Vice President-Nuclear to receive audit reports. Our Nuclear Quality Assurance procedures require that the Senior Vice President-Nuclear receive the Executive Summary of the audit reports. Each Executive Summary contains a brief description of the audit and all conditions adverse to quality identified in the audit. In addition, all management corrective action requests (MCARs), which are significant audit findings, are distributed to the Senior Vice President-Nuclear. Further, conditions adverse to quality identified in audit reports which are not satisfactorily addressed by the appropriate Corporate Officer, will be forwarded to the Senior Vice President-Nuclear for resolution.

These measures ensure that the appropriate level of detail is provided to the Senior Vice President-Nuclear, while also ensuring that the attention of the Senior Vice President-Nuclear is not diluted because of receipt of the entire population of audit reports. Therefore, in response to the NRC's concern whether information on unsatisfactorily addressed audit findings would provide an equivalent level of awareness as information provided in the audit report itself, we believe that the proposed change will result in greater awareness and involvement by the Senior Vice President-Nuclear.

If you have any questions, please do not hesitate to call.

Very truly yours,



G. A. Hunger, Jr.
Manager, Licensing
Nuclear Engineering & Services

cc: T. T. Martin, Administrator, Region I, USNRC
J. J. Lyash, USNRC Senior Resident Inspector