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JAN 14 1994

Docket Nos. 50-277
50-278
50-352
50-353

Mr. D. M. Smith
Senior Vice President-Nuclear
PECO Energy
Nuclear Group Headquarters
Correspondence Control Desk
P. O. Box 195
Wayne, Pennsylvania 19087-0195

Dear Mr. Smith:

SUBJECT: 10 CFR 50.54 QUALITY ASSURANCE PROGRAM REVIEW

- References:
1. Letter, dated October 4, 1993, from Mr. George A. Hunger to U. S. Nuclear Regulatory Commission Transmitting a Proposed Change to the Limerick and Peach Bottom Stations Quality Assurance Program Descriptions, Which Transfer the In-line Reviews of Administrative Procedures
 2. Acknowledgement letter from Mr. J. P. Durr to Mr. D. M. Smith, dated November 5, 1993.

We received the letter (reference 1) transmitting proposed changes to the Limerick and Peach Bottom quality assurance program descriptions. This change removes the Quality Assurance organization from the responsibility for reviewing all administrative procedures and reassigns this responsibility to the line organization implementing the procedure. We note this change is associated with your ongoing nuclear effectiveness and efficiency study (NEEDS).

You are proposing that the following phrase be inserted into the Peach Bottom FSAR paragraph 17.2.5.6 and Limerick FSAR paragraph 17.2.5.11: "Administrative procedures pertaining to quality-related activities shall be reviewed by individuals within the responsible organization. This review shall be controlled by appropriate procedures." We note that this statement does not address the qualification of the personnel nor the specific personnel requirements performing the review. Specifically, we are concerned that the intent of ANSI

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N18.7-1972, "Administrative Controls and Quality Assurance for Operational Phrase of Nuclear Power Plants," page 16, "Rules shall be established which clearly delineate the review of procedures by knowledgeable personnel other than the originator..." and NUREG-75/087, page 17.1-14, 6A2, "The QA organization, or an individual other than the person who generated the document but qualified in quality assurance, reviews and concurs with these documents with regards to QA-related aspects," is being met. (This same phrase appears in NUREG-75/087, Revision 1, 2/79 and Revision 2, 7/92.)

It is upon this basis that the proposed changes can not be accepted.

We expect your resubmittal to include appropriate language defining the qualification requirements and organizational independence (i.e., the reviewer does not answer to the same supervisor responsible for the activity being reviewed) of the individuals performing the review.

Sincerely,

Original Signed By:

Jacque P. Durr, Chief
Engineering Branch
Division of Reactor Safety

PECO Energy

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cc:

J. Doering, Chairman, Nuclear Review Board
G. Rainey, Vice President, Peach Bottom Atomic Power Station
D. R. Helwig, Vice President - Limerick Generating Station
G. Cranston, General Manager, Nuclear Engineering Division
C. Schaefer, External Operations - Nuclear, Delmarva Power & Light Co.
G. Edwards, Plant Manager, Peach Bottom Atomic Power Station
A. J. Wasong, Manager, Experience Assessment
G. A. Hunger, Jr., Manager, Licensing Section
J. W. Durham, Sr., Senior Vice President and General Counsel
J. A. Isabella, Director, Generation Projects Department,
Atlantic Electric
B. W. Gorman, Manager, External Affairs
R. McLean, Power Plant Siting, Nuclear Evaluations
J. L. Kantner, Regulatory Engineer - Limerick Generating Station
Secretary, Nuclear Committee of the Board
D. Poulsen, Secretary of Harford County Council
R. Ochs, Maryland Safe Energy Coalition
J. H. Walter, Chief Engineer, Public Service Commission of Maryland
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
Commonwealth of Pennsylvania
TMI - Alert (TMIA)

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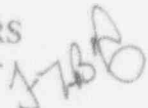
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bcc w/encl:
Region I Docket Room (with concurrences)
W. Dean, OEDO
Joseph Shea, NRR
M. Boyle, PDI-2, NRR

RI:DRS

Bower

12/17/93



RI:DRS

Chaudhary

12/17/93

SKG

RI:DRS

Modes

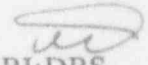
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