

10CFR50.54



PECO ENERGY

PECO Energy Company  
 Nuclear Group Headquarters  
 965 Chesterbrook Boulevard  
 Wayne, PA 19087-5691

March 31, 1994

Docket Nos. 50-277  
 50-278  
 50-352  
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 License Nos. DPR-44  
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 NPF-39  
 NPF-85

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

SUBJECT: Peach Bottom Atomic Power Station, Units 2 and 3  
 Limerick Generating Station, Units 1 and 2  
 Request for Approval to Change the Quality Assurance Program  
 Description by Transferring Organizational Responsibility for the Receipt  
 Inspection Function

Dear Sir:

This letter is being submitted in accordance with 10CFR50.54(a)(3), which requires prior Nuclear Regulatory Commission (NRC) approval for changes to the Quality Assurance Program description that reduce the commitments contained therein. The Quality Assurance Program, as described in PBAPS UFSAR Appendix D, Section 17.2 (7/93) and LGS UFSAR Section 17.2 (11/93), commit PECO Energy Company (PECO Energy) to perform Receipt Inspection activities using ANSI N45.2.6 - 1978 certified Quality Verification (QV) personnel from the Nuclear Quality Assurance (QA) Department. Quality Support (QS) personnel also perform some receipt inspection activities. PECO Energy is proposing that both QV and QS receipt inspections be transferred to the Materials Management Section at each station, and that the NRC review and approve this change. This reduction in commitment does not reduce the PECO Energy commitment to quality, nor to compliance with 10CFR50, Appendix B.

Receipt inspection performed either by QV or Materials Management personnel is organizationally independent of both the vendor producing the items inspected and of the user group. Thus, we do not consider this to be a peer inspection initiative, and Criteria VII, Control of Purchased Material, Equipment and Services, and X, Inspection, of 10CFR50 Appendix B are satisfied.

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*1001* Add: NKR/ARIL/RPEB

This change in commitment is consistent with receipt inspection program changes approved by Region 1 for Baltimore Gas & Electric at Calvert Cliffs.

PECO Energy has developed a transition program to ensure that the receipt inspection process applied to quality assured items will remain at or above the currently provided level of quality. This transition program will involve evaluating, training, qualifying and certifying Materials Management personnel as Receipt Inspectors per the requirements of ANSI N45.2.6-1978 and Regulatory Guide 1.58.

Materials Management personnel will be evaluated for Level I and II Receipt Inspection Certification. Following the successful completion of a one-week training program, eligible Materials Management personnel will undergo an On-the-Job Training (OJT) Program, in which they will examine incoming items under the cognizance of currently qualified QV Receipt Inspectors, who will continue to perform Receipt Inspection for product acceptance. The OJT will continue until the Level III Examiner (currently assigned from NQA during the transition) has verified and certified the Materials Management personnel's competence to perform Receipt Inspections independently. This transition period is expected to last from three to six months.

Station Materials Management will use performance indicators during and following the transition, to compare levels of product quality-related receipt inspection deficiencies against historical baseline data. Performance indicators will be reported periodically to senior management. NQA will assess this transition via surveillance activity and will continue to include receipt inspection in the scope of quality audits. Based on this data, adjustments will be made as required to ensure the continued high quality of receipt inspections during and after the transition period.

PECO Energy recognizes that the transfer of the Receipt Inspection function from NQA to the line organizations is a significant change, and chose this strategy after extensive research and planning. This proposed change in the PECO Energy QA Program will provide greater effectiveness in the Receipt Inspection function because of the following:

- . Integration of Receipt Inspection with commercial receiving activities will aid in Material Management self-identification and implementation of material handling enhancement opportunities.
- . Receipt Inspection by Materials Management will expedite notification of Procurement Engineering of incoming product quality problems. Currently, such problems are identified by QV personnel, then routed to Engineering via Materials Management.

The additional proposed changes to the QA Program descriptions in the PBAPS UFSAR Appendix D, Rev. 11, 07/93, and the LGS UFSAR, Chapter 17.2, Rev. 3, 11/93, are provided in attachments 1 and 2 respectively.

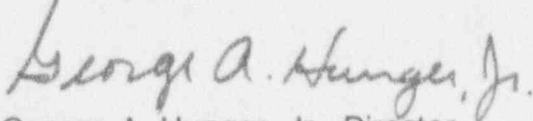
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Preliminary training of Materials Management personnel in Receipt Inspection principles and techniques has already begun. However, elimination of receipt inspections by QA personnel for product acceptance will not occur without NRC approval; therefore, we are requesting your prompt review and approval.

If you have any questions or need additional information, please contact George J. Siefert (610) 640-6768 of my staff.

Very truly yours,



George A. Hunger, Jr., Director  
Licensing Section

Attachments

- cc: T. T. Martin, Administrator, Region I, USNRC, w/attachments  
W. L. Schmidt, USNRC Senior Resident Inspector, PBAPS, w/attachments  
N. S. Perry, USNRC Senior Resident Inspector, LGS, w/attachments  
M. C. Modes, USNRC Region I, w/attachments

## PBAPS

10. Direct the scheduling, planning, and performance of technical monitoring in the areas of operations, health physics, radioactive waste, chemistry, security, post-maintenance/modification testing, surveillance testing, maintenance, fire protection, plant modifications, and emergency planning.
11. Development and approval of Monitoring Guidelines.
12. Interface with station management to provide feedback and obtain corrective action to identified problems.

### 17.2.1.2.3.1.2 Quality Verification Section

The Quality Verification Section is under the direction of a Superintendent, who reports to the site Quality Division Manager.

The Superintendent has the following responsibilities:

1. Provide administrative supervision and technical direction of the activities of the NQA Quality Verification (QV) personnel.
2. Oversee the inspection activities in the areas of ~~receipt inspection~~, radwaste/radmaterial packaging, handling, and shipment; maintenance and modification activities performed on safety-related equipment.
3. Consult with the Assessment Superintendent, Quality Support Superintendent, and the site Quality Division Manager when significant problems affecting quality are identified.
4. Overview of the QV Section activities, schedules, and results.
5. Identify the need for the preparation of NQA procedure supplements relating to QV activities.
6. Ensure that the personnel involved in the implementation of the QV Inspection Activities are trained, qualified, and certified to perform assigned activities.



## PBAPS

7. Ensure that verification results are documented in accordance with NQA procedures, and unacceptable results are identified and rescheduled in inspections, as appropriate.
8. Review of work requests for inclusion of QA Plan requirements and QV activities.
9. Document conditions adverse to quality resulting from QV activities and verify corrective action.
10. Provide independent verifications in mechanical, electrical, I&C and welding disciplines.
11. Provide visual, liquid penetrant, magnetic particle and ultrasonic inspections.
12. Coordinate NDE activities with appropriate plant technical and craft supervision personnel.

### 17.2.1.2.3.1.3 Quality Support Section

The Quality Support Section is under the supervision of a Superintendent, who reports to the site Quality Division Manager. The Superintendent has the following responsibilities:

1. Provide administrative supervision and technical direction of the activities of the Quality Support Section.
2. Consult with the Quality Verification Superintendent, Assessment Superintendent, and the Site Quality Division Manager on significant problems affecting quality.
3. Ensure that personnel involved in performing NQA Quality Support activities are trained and qualified.
4. Review and coordinate revision of NQA Procedures.
5. Review of selected Station Administrative Procedures and implementing procedures.
6. Review and approval of procurement documents and ~~technical receipt inspection documents~~ for safety-related items and services.

PBAPS

- 17.2.7.1.3 Evaluation of vendor, supplier, or contractor capabilities are based on records of previous supply or performance and review of quality assurance programs or audit of supplier facilities, practices, or a combination thereof.
- 17.2.7.1.4 Review of vendor, supplier or contractor qualifications shall be assessed at periodic intervals by NQA commensurate with the importance, complexity, quantity of the product or services being purchased.
- 17.2.7.1.5 Vendors that are on the "Evaluated Vendors List" are audited triennially by NQA commensurate with the importance, complexity, quantity of the product or services being purchased.
- 17.2.7.2 Requisitions for Safety-Related items shall contain a phrase that clearly indicates the quality status of such items.
- 17.2.7.2.1 Procurement documents shall include the identification of nonconformances that require approval by PECO for disposition.
- 17.2.7.3 Documentary evidence that material and equipment conform to the procurement requirements shall be available at the site prior to installation or use of such material, in accordance with PBAPS Administrative Procedures.
- 17.2.7.4 Receipt inspection is the responsibility of the <sup>Materials Management Section</sup> ~~NQA Site Quality Division~~ and shall be performed in accordance with the ~~NQA Procedures~~.  
*Procurement Procedures and Guidelines*
- 17.2.7.4.1 Receipt inspections are performed to verify that received materials, components or parts conform to the purchase order requirements.
- 17.2.7.4.2 Receipt inspection includes, as appropriate, visual examination of physical properties, determination and identification of marking or labeling, review and inspection of quality assurance documentation to verify conformance with the purchase order specifications and requirements.

## LGS UFSAR

- f. Ensure that items requiring corrective action are properly identified and documented in accordance with NQA procedures.
- g. Ensure that personnel involved in performing NQA audits, surveillance, and technical monitoring are trained, qualified and certified.
- h. Assure timely follow-up of committed corrective action.
- i. Assure that corrective action performed in response to previously identified conditions adverse to quality, is adequate and effective to preclude repetition.
- j. Direct the scheduling, planning, and performance of technical monitoring in the areas of operations, health physics, radioactive waste, chemistry, security, postmaintenance/ modification testing, surveillance testing, maintenance, fire protection, plant modifications, and emergency planning.
- k. Development and approval of Monitoring Guidelines.
- l. Interface with station management to provide feedback and obtain corrective action to identified problems.

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- a. Provide administrative supervision and technical direction of the activities of the NQA Quality Verification (QV) personnel.
- b. Oversee the inspection activities in the areas of ~~receipt inspection~~ radwaste/radmaterial packaging, handling, and shipment; maintenance and modification activities performed on safety-related equipment.
- c. Consult with the Assessment Superintendent, Quality Support Superintendent, and site Quality Division Manager, when significant problems affecting quality are identified.
- d. Overview of the QV Section activities, schedules, and results.
- e. Identify the need for the preparation of NQA procedure supplements relating to QV activities.

## LGS UFSAR

- g. Ensure that verification results are documented in accordance with NQA procedures, and unacceptable results are identified and rescheduled in inspections, as appropriate.
- h. Review of work requests for inclusion of QA Plan requirements and QV activities.
- i. Document conditions adverse to quality resulting from QV activities and verify corrective action.
- j. Provide independent verifications in mechanical, electrical, I&C and welding disciplines.
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- l. Coordinate NDE activities with appropriate plant technical and craft supervision personnel.

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- b. Consult with the Quality Verification Superintendent, Assessment Superintendent, and the site Quality Division Manager, on significant problems affecting quality.
- c. Ensure that personnel involved in performing NQA Quality Support activities are trained and qualified.
- d. Review and coordinate revision of NQA Procedures.
- e. Review of selected Station Administrative Procedures and Implementing Procedures.
- f. Review and approval of procurement documents ~~and technical receipt inspection documents~~ for safety related items and services.
- g. Review NCRs for conditions adverse to quality.
- h. Tracking and trend analysis of Verification and Monitoring Activity reports and CARs.
- i. Document conditions adverse to quality identified during Quality Support activities.



## PBAPS

### 13.3.5.2 Quality Assurance Receipt Inspection Personnel Training

\* See below

- ~~a. Nuclear Operations Quality Assurance Division Procedure QADP-100, titled "Training, Qualifying and Certification of Nuclear Operations Quality Control Personnel", defines the qualifications for personnel in this group.~~
- ~~b. Periodic recertification of PBAPS QA receipt inspection personnel in accordance with ANSI N45.2.6-1973 is required by Procedure QADP-100.~~

### 13.3.5.3 Reactor Engineering Personnel Training

- a. Each reactor engineer is involved in sufficient startups to insure that he retains his proficiency in reactor engineering startup activities. This provides on-the-job experience and reinforcement of previous training.
- b. Before any unit startup, discussions are held as appropriate to review new procedures or methods which may be pertinent to reactor engineering startup activities. Unusual conditions and potential problems are discussed to insure a clear understanding of the startup procedure.
- c. Non-licensed reactor engineers participate in training programs covering BWR systems and technology including automatic depressurization, emergency core cooling, fuel and core configuration, instrumentation, radiation monitoring, and other major systems.

### 13.3.5.4 Results Engineering Personnel Training

- a. Test engineers normally participate in training programs covering BWR systems and technology.
- b. A meeting is held each normal workday morning to discuss plant status and job assignments. Any special problems and possible solutions are discussed.

### 13.3.5.5 Health Physics and Chemistry Personnel Training

- a. PECO health physics technicians can progress through four levels of qualification based on training and plant experience. Progression from

\* Materials Management personnel will be evaluated, trained, qualified, certified and recertified in accordance with ANSI N45.2.6-1978.