

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-4502

JOHN S. KEMPER
VICE-PRESIDENT
ENGINEERING AND RESEARCH

FEB 25 1983

Mr. Ronald C. Haynes, Director
United States Nuclear Regulatory Commission
Office of Inspection and Enforcement, Region I
631 Park Avenue
King of Prussia, PA 19406

Subject: USNRC IE Region I Letter dated November 23, 1982
RE: Site Inspection of October 4-November 14, 1982
Inspection Report No. 50-352/82-13

Reference: J.S. Kemper Letter to R.C. Haynes, dated 12/21/82

File: QUAL 1-2-2 (352/82-13)

Dear Mr. Haynes:

In response to recent discussions with the NRC resident inspector, Mr. S.K. Chaudhary, we offer the following information which supplements our referenced letter.

Subsequent to the identification by Philadelphia Electric Quality Assurance of the problem of timely incorporation of changes into drawings, measures have been taken to improve the timeliness and to clarify requirements for incorporating drawing changes, particularly for those drawings that have a high activity of revision. Currently, approximately 900 drawing changes are processed per month - over 10,000 per year. As of the second week in February there were approximately 100 overdue drawing changes that had not yet been incorporated. We feel that this is an acceptable and reasonable level from both a scheduling and quality assurance standpoint considering the present level of engineering activity.

During the subject site inspection, the NRC identified this problem as an Item of Noncompliance. Accordingly, we plan to take the following additional steps to further improve the timeliness of incorporation of changes into drawings.

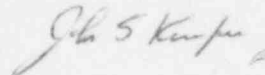
- 1) The change control process for high activity documents, such as the electrical raceway installation instruction drawings and the instrument installation instruction drawings, will be modified to simplify the issuance of changes. The drawing cover sheet and the affected drawing page will be re-issued instead of issuing Field Change Requests (FCR's), Field Change Notices (FCN's), or Drawing Change Notices (DCN's).
- 2) Computerized logs of drawing change notices (FCR's, FCN's, and DCN's) are being used as periodic reminders to incorporate the changes into the drawings.

The implementation of these additional steps is expected to further improve the timeliness of incorporation of drawing changes. The benefits of these changes should be achieved by May 1983.

Enclosed is an affidavit relating to the response.

Should you have any questions concerning these items, we would be pleased to discuss them with you.

Sincerely,



JMC/drd

Copy to: Director of Inspection and Enforcement
United States Nuclear Regulatory Commission
Washington, DC 20555

S. K. Chaudhary, US NRC Resident Inspector

COMMONWEALTH OF PENNSYLVANIA :

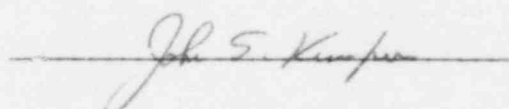
SS.

COUNTY OF PHILADELPHIA :

JOHN S. KEMPER, being first duly sworn, deposes

and says:

That he is Vice President of Philadelphia Electric Company, the holder of Construction Permit CPPR-106 for Limerick Generating Station Unit 1; that he has read the foregoing letter providing a supplemental response to Inspection Report No. 50-352/82-13 and knows the contents thereof; and that the statements and matters set forth therein are true and correct to the the best of his knowledge, information and belief.



Subscribed and sworn to
before me this 25th day
of February, 1983


Notary Public

PATRICIA D. SCHOLL
Notary Public, Philadelphia, Philadelphia Co.
My Commission Expires February 10, 1986