

October 28, 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: PEACH BOTTOM ATOMIC POWER STATION UNITS 2 AND 3 AND LIMERICK
GENERATING STATIONS UNITS 1 AND 2 TRANSFER OF REVIEW OF
ADMINISTRATIVE PROCEDURES

- References: (1) Letter from Mr. G. A. Hunger to U.S. Nuclear Regulatory
Commission, dated October 4, 1993
- (2) Letter from J. P. Durr to Mr. D. M. Smith, dated
January 14, 1994
- (3) Letter from Mr. G. A. Hunger to U.S. Nuclear Regulatory
Commission, dated March 9, 1994

In Reference (1), PECO Energy Company requested to transfer in-line review of administrative procedures from Nuclear Quality Assurance (NQA) to the line organization. Additionally, NRC Reference (2) requested information with regard to the qualification of the personnel performing the reviews and a description of the organizational independence of the individuals performing the procedure review. PECO Energy Company provided this information in Reference (3).

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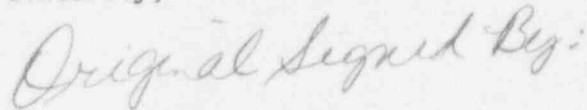
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Mr. D. M. Smith

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On the basis of the information provided by PECO in References (1) and (3), the NRC approves the transfer of administrative procedures from Nuclear Quality Assurance to the in-line organization. For future correspondence, please refer to QA 94-01.

Sincerely,



Michael C. Modes, Chief
Materials Section
Division of Reactor Safety

cc:

J. Doering, Chairman, Nuclear Review Board
G. Rainey, Vice President, Peach Bottom Atomic Power Station
D. R. Helwig, Vice President - Limerick Generating Station
W. H. Smith, III, Vice President, Nuclear Station Support
J. L. Kantner, Regulatory Engineer - Limerick Generating Station
D. B. Feters, Director, Nuclear Engineering
A. F. Kirby, III, 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., Director, Licensing
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
D. Poulsen, Secretary of Harford County Council
R. Ochs, Maryland Safe Energy Coalition
J. H. Walter, Chief Engineer, Public Service Commission of Maryland
Secretary, Nuclear Committee of the Board
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
K. Abraham, PAO (2)
NRC Resident Inspector
Commonwealth of Pennsylvania
TMI - Alert (TMIA)

October 28, 1994

Mr. D. M. Smith

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bcc:

Region I Docket Room (with concurrences)

K. Gallagher, DRP

V. Curley, DRS

W. Dean, OEDO

F. Rinaldi, NRR

J. Shea, NRR

J. Stolz, PDI-2, NRR

M. Shannon, ILPB

DRS File (4)

DOCUMENT NAME: A: PBLIM.QA

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PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

955-65 CHESTERBROOK BLVD.

WAYNE, PA 19087-5691

(215) 640-6000

October 4, 1993

STATION SUPPORT DEPARTMENT

Docket Nos. 50-277
50-278
50-352
50-353
License Nos. DPR-44
DPR-56
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
the In-Line Reviews of Administrative Procedures

Dear Sir:

This letter is submitted in accordance with 10CFR50.54(a)(3), which requires prior NRC approval for any change which reduces the commitments in a previously accepted Quality Assurance Program description. The Quality Assurance Program, as described in Appendix D of the Peach Bottom Atomic Power Station (PBAPS) Updated Final Safety Analysis Report (UFSAR) and Chapter 17.2 of the Limerick Generating Station (LGS) UFSAR, committed Philadelphia Electric Company (PECO), Nuclear Quality Assurance Department, to perform an in-line review of administrative procedures of the Nuclear Group and the Purchasing Department. PECO is proposing to eliminate this requirement for the Nuclear Quality Assurance (NQA) organization to perform in-line reviews of administrative procedures. A review of administrative procedures will continue to be performed by the line organizations. In that these in-line reviews will no longer be performed by the independent NQA organization, this proposed change is a reduction in commitment in the NRC approved PBAPS and LGS QA Program Descriptions; however, this change does not decrease the Philadelphia Electric Company commitment to quality or to compliance with 10CFR50, Appendix B. We are therefore requesting NRC approval of this change in accordance with 10CFR50.54(a)(3).

As our organizations restructure and assume roles and responsibilities to increase their accountability for the total quality of their work, we have determined that the attributes for which NQA reviews administrative procedures should be included in the line organization review of the procedure. Assigning this responsibility to the line organization will result in more efficient and effective use of resources.

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Attachment 1
Proposed Changes to the
Quality Assurance Program
Description for
Peach Bottom Atomic Power Station
Units 2 and 3



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

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

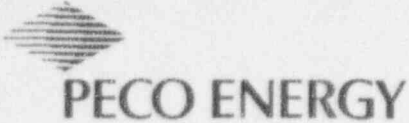
JAN 14 1994

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)



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

94-01

March 9, 1994

Docket Nos. 50-277

50-278

50-355

50-353

License Nos. DPR-44

DPR-55

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
Additional Information on Request for Approval to Change the
Quality Assurance Program Description by Transferring the In-Line
Reviews of Administrative Procedures

- REFERENCES:
1. Letter from Mr. George A. Hunger, Jr. to
U.S. Nuclear Regulatory Commission dated
October 4, 1993
 2. Acknowledgement Letter from Mr. J. P. Durr to
Mr. D. M. Smith dated November 5, 1993
 3. Letter from Mr. J. P. Durr to Mr. D. M. Smith dated
January 14, 1994

Dear Sir:

The reference letter 3 requested additional information for PECO Energy Company's request to transfer in-line review of administrative procedures from Nuclear Quality Assurance (NQA) to the line organization. Specifically, Reference 3 requested that we describe how the intent of ANSI N18.7-1976, page 16, which states "Rules shall be established which clearly delineate the review of procedures by knowledgeable personnel other than the originator...", is being met and to define the qualification requirements and organizational independence of the individual performing the procedure review.

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The intent of ANSI 18.7-1976, page 16, will be met by the commitments put into new paragraphs in the Peach Bottom Atomic Power Station (PBAPS) Updated Final Safety Analysis Report (UFSAR), paragraph 17.2.5.6, and Limerick Generating Station (LGS) UFSAR, paragraph 17.2.5.11, which are contained in attachments 1 and 2 respectively. These commitments will be implemented by procedures AA-C-5 "Preparation and Control of Procedures/Guidelines" and A-C-1, "Procedures Writer's Guide".

The individuals reviewing administrative procedures will be Station Qualified Reviewers (SQR) who are described in Technical Specifications or Qualified Reviewers (QR) selected by management and trained in quality assurance program requirements and policies. The selection of these individuals will be based on their experience and area of expertise. Administrative procedures that are required to be reviewed by the Plant Operations Review Committee (PORC) will be reviewed by SQRs for inclusion of quality program requirements. Off-site administrative procedures that are not reviewed by PORC will be reviewed by QRs for inclusion of quality program requirements.

The qualifications for SQR and QRs for review of administrative procedures will be the same. These qualifications will be contained in PB and LGS administrative procedures and common guidelines. The qualifications of the SQR/QRs meet the requirements of ANSI/ANS 3.1-1981 Section 4.7.2 at PBAPS and ANSI/ANS 3.1-1978 Section 4.7.2 at LGS or similar experience as allowed by Technical Specifications.

Currently, the PBAPS and LGS UFSARs require organizational independence in review of Administrative Procedures in that the review is performed by NQA. This independence is not required by regulation. The proposed procedure review program has been developed to assure functional independence by requiring that the person who generated the procedure or revision is not also the reviewer of the procedure. The proposed procedure review process parallels the industry accepted programs for 10 CFR 50.59 evaluations and design verification reviews. The 10 CFR 50.59 evaluations and design verification reviews are significant reviews with a direct safety impact, and these review processes have been effectively implemented.

PECO Energy has established a transition program to ensure that the review of procedures remain at the current high quality. This transition program will require a dual review by the SQR/QR (in-line) and NQA (parallel). This dual review will continue until it is established that the SQR/QR review is effective. NQA will continue to audit the procedure revision process to assure the quality of the reviews remain high during and after the transition period.

PECO Energy recognizes that the transfer of in-line review of administrative procedures 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 Administrative Procedure Review Program because of the following:

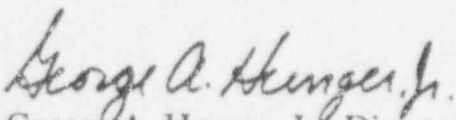
- The SQR/QR review process is an established program which has direct involvement with PORC and line management.
- The SQR/QR reviewers are required to have a high level of experience and expertise.
- The SQR/QR procedure review program is subject to the self assessment process.
- NQA will continue to audit the procedure review program.
- The line organization (which includes SQR/QRs) shall be accountable for the inclusion of NQA program requirements in the administrative procedures.
- SQR/QRs will be more effective in identifying trends in both technical and quality related deficiencies.
- A monitoring program, the results of which will be reported to senior management, will measure the quality of administrative procedures reviews during transition from NQA to SQR/QR review (during the transitional phase, both NQA and SQR/QRs will review the administrative procedures).
- SQR/QRs will be required to use criteria approved by the NQA organization in the review of administrative procedures (this criteria will be incorporated into the controlling procedures).

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.

These proposed changes are scheduled to become effective upon your 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

March 9, 1994

Page 4

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

INSERT TO LGS UFSAR PARAGRAPH 17.2.5.11

Administrative Procedures pertaining to Quality-Related activities shall be reviewed by individuals qualified in QA Program Requirements and the individuals who are reviewing these Administrative Procedures shall not have prepared the revision of the procedure. This review shall be controlled by appropriate procedures.

Revised 2/24/94

LGS UFSAR

17.2.5.4

Limerick Generating Station Administrative Procedures shall be reviewed by PORC and approved by the Plant Manager or his designated alternates ~~and the Manager, Limerick Quality, NQA Department,~~ and shall be distributed to predetermined personnel. These administrative procedures shall contain provisions which clearly delineate the sequence of actions for the preparation, review, approval, and control of activity implementing procedures, instructions, and drawings.

17.2.5.5

Implementing procedures, instructions, and drawings shall include, as appropriate, quantitative and qualitative acceptance criteria, sign-offs, and inspection points to assure that important activities are satisfactorily accomplished.

Appropriate recording documents, such as log books, Maintenance Request Forms, checkoff lists, or data sheets, shall be used, when appropriate, to assure compliance with the instructions, procedures, and drawings.

17.2.5.6

Engineering notification to field forces and other engineering groups for implementation of a modification are given in one or more Engineering Work Letters. The Engineering Work Letter(s) include the following:

- a. Scope of work
- b. Engineering, design, and procurement responsibilities
- c. Special testing requirements

17.2.5.7

Modification Installation Memoranda are issued by the Installation Section to define to installation personnel the work operations necessary to perform a modification. The Modification Installation Memoranda include or reference the following:

- a. Modification drawings
- b. Purchase orders for components
- c. Major equipment list

LGS UPSAR

17.2.2.7

The procurement of spare parts, materials, and services for LGS is initiated by cognizant personnel in accordance with approved policies and procedures. Materials Management is an independent organization functioning as a service group to the station. The ordering, receipt, storage and issuance of materials and services are accomplished in accordance with Materials Management, Corporate, NQA, and plant procedures which incorporate suitable measures to ensure quality. Requisitions for materials or services are transmitted from Materials Management or other authorized PECO entities to the Purchasing Division where buyers execute the order in accordance with Company purchasing procedures and policies. Spare parts, materials, and services may also be obtained via a contractor who has been evaluated and is on the Evaluated Vendors List.

17.2.2.8

The QA Program for Limerick Generating Station will be defined in the Nuclear Quality Assurance Plan (QA Plan). The QA Plan implements the policies and objectives of the Nuclear organization, and applicable codes, standards, and regulations by addressing the managerial and administrative controls in various operational activities such as: Training, Health Physics, Chemistry, Fuel and In-vessel Material, Shift Operations, Surveillance Testing, Maintenance/I&C, In-Service Inspection/Testing, Procurement, Modifications, Radioactive Waste/Material, Engineering and Design, and Plans.

For each of these activities, the QA Plan shall address the 18 criteria of 10CFR50, Appendix B, and describe how each activity is in compliance with the applicable criteria in Appendix B. In addition, the radioactive waste/material activity shall also address the requirements of 10CFR71, Subpart H, Packaging and Transportation of Radioactive Material, Quality Assurance. Procedures are written to implement all aspects of the QA Plan. A matrix of these procedures or documents is presented in Appendix 17.2.I to demonstrate that 10CFR50, Appendix B criteria are fully implemented by documented procedures.

Also, the QA Plan shall require written procedures to implement the requirements of the Regulatory Guides listed in UFSAR Section 1.8, the General Design Criterion 1 of Appendix A to 10CFR50, and 10CFR50.55a.

Continue

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~~NQA, in the review of Administrative Procedures, shall ensure that Regulatory Guide commitments are included in the appropriate procedures.~~

LGS UPSAR

- i. Document conditions adverse to quality resulting from QV activities and verify corrective action.
- j. Provides independent verifications in mechanical, electrical, I&C and welding disciplines.
- k. Provides visual, liquid penetrant, magnetic particle, and ultrasonic inspections.
- l. Coordinates 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:

- a. Provide administrative supervision and technical direction of the activities of the Quality Support Section.
- b. Consult with the Quality Verification Superintendent, Technical Monitoring Superintendent, Quality Assurance 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 condition, adverse to quality identified during Quality Support activities.

Attachment 2
Proposed Changes to the
Quality Assurance Program Description
for
Limerick Generating Station
Unit 1 and 2

- 17.2.5.2.4 Controlled equipment manuals and manufacturers' instruction books shall be readily available for use.
- 17.2.5.3 Maintenance Administrative Procedures for the control of Nuclear Maintenance Division work shall be prepared, approved by the Nuclear Maintenance Division Manager, ~~and approved by Corporate Nuclear Quality Manager.~~
- 17.2.5.4 ~~Purchasing Department procedures and Administrative Procedures which are applicable to the procurement activity at PECO nuclear power plants are reviewed and approved by the Corporate Nuclear Quality Manager.~~
- 17.2.5.5 NQA personnel shall, in the course of audits, surveillances, and monitoring review the adequacy, completeness, and effectiveness of implementing procedures, instructions, and drawings associated with activities performed under the QA Plan.
- 17.2.6 Document Control
- 17.2.6.1 Measures are established through the requirements of the QA Plan to control the issuance of instructions, procedures, and drawings, including changes thereto. These documents are reviewed and approved in accordance with Administrative Procedures. They are procedurally controlled through the use of master registers or indices which are updated with the issuance of revised procedures, instructions and drawings. ~~Site generated Administrative Procedures and revisions there to are reviewed and approved by the site Quality Manager, NQA.~~ Distribution is to predetermined responsible personnel to preclude the use of superceded documents.
- 17.2.6.1.1 Changes to any of these documents shall be reviewed for adequacy and released by the same authorized personnel who performed the original review or by an individual designated as a replacement.

- 17.2.2.5 Nuclear Quality Assurance is staffed with trained, qualified, and experienced personnel, both on and off site. NQA has the primary responsibility through planned and periodic QA audits and surveillances and QV Inspections and Monitoring of work-in-progress to verify through objective evidence that this Quality Assurance Program is being accomplished in accordance with the QA Plan.
- 17.2.2.5.1 The NQA Training Coordinator, Corporate Nuclear Quality Division, in conjunction with site NQA training coordinators, is responsible for developing and maintaining a quality assurance/quality verification indoctrination and training program to establish proficiency in quality assurance/quality control and to qualify NQA personnel in accordance with NQA requirements and procedures.
- 17.2.2.6 NQA shall be involved in the planning of quality-related activities to assure that adequate quality assurance/quality verification requirements are provided consistent with the importance of such activities.
- 17.2.2.7 Resolutions resulting from differences of opinion regarding deficiencies or noncompliances identified from audits, surveillances, inspections or monitoring, by NQA shall be made by the Senior Vice President, Nuclear.
- 17.2.2.8 NQA has been given the authority to require the stopping of work in the event that such work could result in a degradation of quality.
- 17.2.2.9 The PBAPS QA program is documented by written policies, procedures and instructions and shall be carried out throughout the life of the plant.
- ~~17.2.2.9.1 The Corporate Nuclear Quality Division Manager reviews and approves all non-site generated Administrative Procedures to implement the QA Plan.~~

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

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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.
7. Review NCRs for conditions adverse to quality.
8. Tracking and trend analysis of Verification and Monitoring Activity reports and CARs.
9. Document conditions adverse to quality identified during Quality Support activities.