



PECO ENERGY

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November 14, 1994

Docket Nos. 50-277

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License Nos. DPR-44

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

Subject: Peach Bottom Atomic Power Station, Units 2 and 3  
Request for Approval to Change the Quality Assurance  
Program Description by Elimination of the Independent  
Safety Engineering Group Composition Requirement

Reference: Letter from G. A. Hunger, Jr. (PECO Energy) to USNRC  
dated November 14, 1994

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 (QADP). PECO Energy Company (PECO Energy) is proposing to eliminate the Independent Safety Engineering Group (ISEG) composition requirement while maintaining the independent technical review function. Individuals performing independent technical review will report to senior management of the Peach Bottom Atomic Power Station (PBAPS) Quality Division Manager (QDM) in lieu of a dedicated manager. The reviews will be performed by several personnel who are independent of the plant management organization. Detailed recommendations will be made directly to the affected organization with copies of the recommendations to the Senior Vice President and Chief Nuclear Officer and the Director - Nuclear Quality Assurance (NQA) in lieu of making the recommendations to the Senior Vice President and Chief Nuclear Officer. The qualification for individuals performing the independent technical review function can be either degreed engineers as stipulated in NUREG-0737, "Clarification of TMI Action Plan Requirements," or non-degreed individuals who have at least eight years of related experience.

NUREG-0737 specifies the staffing levels for an ISEG. The staffing requirement for five dedicated engineers is burdensome to a utility because it restricts the capability to utilize resources to their maximum advantage and does not result in an increase in the protection afforded to the health and safety of the public. The proposed change would provide flexibility to accomplish the ISEG review function. The ISEG and Quality Assessment Section currently perform their oversight assessment functions independently from one another. The proposed change would integrate the independent review function into the overall audit and review function under the direction of the PBAPS QDM resulting in better utilization and coordination of resources. Oversight effectiveness would be enhanced by allowing greater flexibility in focusing resources on areas deemed by the QDM.

The purpose, scope and thoroughness of independent technical reviews will not be affected. Management oversight of the independent technical review function will not be diminished.

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The changes constitute a reduction in commitment to the Quality Assurance Program Description (QADP) (Included or referenced in Section 17.2 of Appendix D of the PBAPS UFSAR); however, the reduction in commitment does not reduce the PECO Energy commitment to quality or compliance with 10CFR50, Appendix B. Transferring the responsibility for the independent technical review function to the QDM will have no adverse impact on the independent technical review function. The QDM position is at a higher management level than the ISEG manager position and is directly responsible for the adequacy of site oversight. The QDM is already required to satisfy the minimum professional level experience requirements stipulated in ANSI N18.1-1971. Moreover, the NRC has approved a three person ISEG to report to the site QA Manager for GPU Nuclear operated plants. Thus, precedence exists for replacement of the ISEG Manager with the PBAPS QDM to satisfy the intent of NUREG-0737 with respect to supervision of personnel performing the independent technical review function.

The current PBAPS UFSAR staffing for ISEG is five dedicated full time engineers, one of which is the ISEG Manager. The ISEG Manager provides primarily a supervisory function for the four remaining ISEG engineers. The proposed change requests that the independent technical review function be performed by several (i.e., three or more) individuals reporting to the PBAPS QDM. Improvements since the ISEG was implemented at PBAPS have resulted in less need for a five person group to accomplish the independent technical review function. For example, the Operating Experience review function which includes review of NRC and INPO issuances was originally assigned to ISEG, but has been transferred to line organizations. The Experience Assessment Group trends events and event causes via the Performance Enhancement Program which relieves ISEG of this task. ISEG now independently analyzes and uses data from the Performance Enhancement Program. Improved plant computers and the development of station performance indicators have reduced the ISEG effort needed to analyze unit performance. PBAPS self-assessment practices have improved significantly. This results in less ISEG effort to independently assess operational and maintenance issues. INPO has established and has a fully developed function of analyzing and highlighting industry events. This serves to reduce the ISEG effort in this area. NQA and ISEG functions include observations of line performance in this area from time-to-time. Therefore, the functions of ISEG originally performed by four dedicated engineers can now be performed by several personnel who are not dedicated to this function. Individuals performing the independent technical review function will still remain independent of the power production management organization.

PBAPS UFSAR Section 13.8.6, "Independent Safety Engineering Group (ISEG)," commits to more experience for PBAPS ISEG personnel than specified by NUREG-0737. This commitment was made as part of a settlement agreement between PECO Energy and the Commonwealth of Pennsylvania. All restrictions on alterations to this commitment terminated on February 27, 1993. Degreed individuals performing the independent technical review function will satisfy the minimum experience specified in NUREG-0737 for degreed personnel. The proposed change would also allow non-degreed personnel with at least eight years of related experience to perform the independent technical review function. Performance of the independent technical review function by non-degreed individuals has been approved at Clinton, Beaver Valley and Diablo Canyon.

The proposed changes are consistent with the recommendations contained in the NRC's Regulatory Review Group Report (Final Report, August 1993) which included an examination of PBAPS Unit 2 TS Section 6.2.3.1, "Independent Safety Engineering Group (ISEG)." The Regulatory Review Group assessment noted that removal of this function through the TS amendment process could be pursued because an ISEG is not a regulatory requirement for Peach Bottom. A TS Change Request was transmitted by the reference letter to accomplish removal of ISEG from PBAPS TS. Additionally, on September 29, 1994, TS Change Request No. 93-16 was submitted to adopt the TS in NUREG-1433, "Standard Technical Specifications General Electric Plant, BWR/4." NUREG-1433 permits the ISEG function to be performed as a staff function under the reviews and audits program. This results in relaxation of the five-person staffing requirement and permits more flexible methods of performing the reviews.

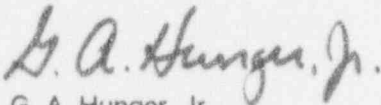
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In conclusion, while considered a reduction in commitment in the QADP, these changes will not reduce the effectiveness of the quality assurance program.

The proposed changes to the QADP are provided in Attachment 1. Because approval of these QADP changes would improve resource allocation, we request the NRC's prompt attention to approve these changes by January 3, 1995. If you have any questions or need additional information, please contact us.

Very truly yours,



G. A. Hunger, Jr.  
Director - Licensing

JLP/esr

Attachment

cc: T. T. Martin, Administrator, Region I, USNRC  
W. L. Schmidt, USNRC Senior Resident Inspector, PBAPS  
R. R. Janati, Commonwealth of Pennsylvania  
M. C. Modes, Chief, Materials Section, Region I, USNRC