

U.S. NUCLEAR REGULATORY COMMISSION  
REGION I

Report No. 50-277/83-32 and 50-278/83-30

Docket No. 50-277 and 50-278

License No. DPR-44 and DPR-45

Priority -

Category C

Licensee: Philadelphia Electric Company  
2301 Market Street  
Philadelphia, Pennsylvania

Facility Name: Peach Bottom Atomic Power Station, Units 2 and 3

Inspection At: Delta, Pennsylvania

Inspection Conducted: November 16-18, 1983

Inspector: William Oliveira for 12/30/83  
G. Napuda, Lead Reactor Engineer date

Approved by: P. K. Fahn 12/30/83  
for D. L. Capton, Chief, Management Programs date  
Section, Division of Engineering and Technical Programs

Inspection Summary: Inspection on November 16-18, 1983 (Combined Reports  
50-277/83-32 and 50-278/83-30

Areas Inspected: Routine, unannounced inspection of the Quality Assurance Program in the area of records control, retention and retrieval. The inspection involved 28 inspector hours onsite by one region based inspector.

Results: No violations were identified in the area inspected, however one deviation was observed (records program not implemented in full conformance with ANSI N45.2.9-1974 by June, 1983—a deviation from the actions stated in S. L. Daltroff's letter to the NRC dated October 19, 1981).

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## DETAILS

### 1. Persons Contacted

J. Austin, Supervising Engineer-Construction Division  
\*R. Flesichmann III, Plant Superintendent  
A. Fulvio, Assistant Maintenance Engineer  
G. John, Surveillance Test Coordinator  
R. Jones, QC Engineer-Construction Division  
S. Nelson, Support Health Physicist  
D. Richardson, Supervisor-Nuclear Records  
S. Spitko, Station QA Engineer  
\*T. Wilson, Site QA Supervisor

#### NRC

\*S. Pullani, Reactor Engineer  
\*J. Williams, Resident Inspector

The inspector also held discussions with and interviewed other administrative, engineering, operations, QA/QC, and technical personnel.

\* denotes those present at the exit interview.

### 2. Records

#### 2.1 References/Requirements

- Quality Assurance Program Description (QAPD), July 22, 1983
- ANSI N45.2.9-1974, Requirements for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants
- Regulatory Guide (RG) 1.88, Revision 2
- ANSI N18.7-1976, Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants
- Letter from D. L. Daltroff to T. T. Martin (NRC) dated October 19, 1981

#### 2.2 Program Review

The QAPD had been previously submitted to the NRC under the provisions of 10 CFR 50.54; reviewed at the Region I offices; and, the results were communicated to the licensee in an August 10, 1983 letter. The licensee's QA program for records management was reviewed to assure conformance with the updated QAPD and other requirements listed in paragraph 2.1; and, that the program and administrative controls included the following.

- Identification of the records storage facility, custodian in-charge of the records storage facility, and environmental conditions
- A filing system for record retrieval, access controls to files, and an accountability system for removed files
- Receipt verification of transmitted records and identification of records required to be maintained
- A method for correcting records and disposing of superseded records including assignment of authority and responsibility for such actions
- Controls and responsibilities for collecting, transferring, protecting and maintaining records.

The following procedures were reviewed to determine that the above administrative controls were established, including conformance with the QADP and commitments contained therein.

- A-46, Records Retention Requirements, Revision 6
- A-46.1, Transmittal of Records to the Nuclear Records Management System
- Procedure File No. 3-7(16)A, Processing of Nuclear Records, July 7, 1983
- Systems Support Division Nuclear Related Document Register, October, 1983

### 2.3 Implementation

The licensee's Nuclear Records Management System (NRMS) is composed of but not limited to the following.

- A Document Administration Center (DAC) at the corporate offices and at the station an additional center is to be established at another nuclear power station)
- The permanent storage of nuclear records on archival quality 16 mm and 35 mm microfilm
- Permanent storage of non-microfilmable (e.g. radiographs, illegible documents) records at an offsite commercial facility
- Retention and offsite storage of original records whose microfilm image was judged unsatisfactory
- A computer based information and indexing system

- Written administrative controls including those listed in paragraph 2.2
- A records storage "vault" onsite for temporary storage of records being processed for permanent storage or single copy records recalled from the offsite storage facility for re-review (e.g. regulatory, technical, historical)

The inspector toured a number of locations where documents, required to be retained as records, were being reviewed and/or accumulated for transfer to the onsite DAC. The inspector also observed ongoing activities including the receipt, retrieval and processing (e.g. review, logging, boxing, actual physical transfer) of records at the onsite DAC. The inspector additionally interviewed the personnel performing the observed activities to ascertain their familiarity with and knowledge of procedural and programmatic requirements. Further, the inspector examined the storage conditions of records currently retained in the onsite "vault" and requested retrieval of various records (e.g. surveillances/tests).

## 2.4 Findings

One of the subjects discussed by S. L. Daltroff (licensee vice president) in an October 19, 1981 letter to T. T. Martin (NRC) was a system for the collection and storage of records. The letter stated in part, "...we anticipate that we will be in full compliance with the requirements of ANSI N45.2.9 by June, 1983". The licensee's Quality Assurance Program Description, as approved by the NRC, commits to ANSI N45.2.9-1974 that states in part, "Permanent and temporary record storage facilities shall be so constructed or located as to protect contents from possible destruction...and from possible deterioration..." (paragraph 5.6); "The designated authority or authorities for receiving quality assurance records...shall control their safety during that time that the records are in their possession." (paragraph 4.1); and, "Records shall not be stored loosely." (paragraph 5.4). Further, implementing procedure A-46.1 states in part "Each group is responsible for those documents listed in Exhibit A-46.1-1 as their responsibility." (paragraph 5.1); and, the Exhibit assigns responsibility for Maintenance Request Forms and Health Physics type (including Radiation Work Permits) records to the maintenance and health physics groups (Exhibit paragraphs 11 and 5 respectively).

Contrary to the above, paragraphs 2.4.1 and 2.4.2 below discuss two examples where deviation has taken place from the licensee's commitment described above and are therefore cited as deviation from commitments (277/83-32-01 and 278/83-30-01.)

- 2.4.1 The licensee is involved in the Nuclear Plant Reliability Data (NPRD) review system established by INPO (Institute of Nuclear Power Operators).

Maintenance activities are controlled by means of Maintenance Request Forms (MRFs) and these records are accumulated in the Maintenance Office

for the NPRD review prior to their transfer to the DAC. A substantial backlog of unreviewed MRFs has developed and necessity has resulted in the storage of these records in several cardboard boxes which were then placed under desks, along aisles, etc. There were no NPRD reviews in progress during this inspection and none had been done for a few weeks. A sampling of these records indicated they had been retained in this fashion between sixty days and one year. Further, the office is normally a busy area and for practical purposes access is uncontrolled.

- 2.4.2 Health physics (HP) type records are accumulated in the Health Physics Office for various reviews prior to their transfer to the DAC. One of the most important of these is the review of Radiation Work Permits (RWPs) for ALARA radiation exposure purposes. The data for this program is entered into a manual information and tracking system. One technician, on loan from another licensee nuclear station, was performing ALARA reviews during the course of this inspection. The substantial backlog of RWP and other HP records that has developed has resulted in these loose records being stored in stacks on several desks about the office. A random sampling of these records indicated they had been retained under these conditions in excess of sixty days but under one year.

- 2.4.3 Audit Report AP83-19 PR, Nuclear Records Management System, was brought to the inspector's attention. The audit was conducted between April 28 and May 17, 1983 and was a detailed review of the records systems implementing procedures, and their implementation at both the station and corporate offices. Audit findings normally identified as Deficiencies were classified as concerns since the date for full compliance with ANSI N45.2.9-1974 had not yet arrived. The auditors did describe a number of these concerns in detail; expressed their doubt that full compliance could be achieved by the committed target date; and, listed those areas that were in compliance with requirements.

During the exit meeting the inspector stated that, since all the detailed areas addressed in the audit were not reviewed during this inspection, it was the responsibility of the licensee to initiate action to correct any other existing noncompliances not identified during this inspection. The licensee representatives acknowledged the inspector's statement. The inspector's findings differed from the auditors' concerns. However, it was noted that some of the identified concerns had been corrected in those areas reviewed by the inspector.

No violations were identified.

### 3. Management Meetings

Licensee management was informed of the scope and purpose of the inspection at an entrance interview conducted on November 16, 1983. The findings of the inspection were periodically discussed with licensee representatives during the course of the inspection. An exit interview was



conducted on November 18, 1983, at the conclusion of the inspection (see paragraph 1 for attendees) at which time the findings were presented to licensee management.

At no time during this inspection was written material provided to the licensee by the inspector.