

PHILADELPHIA ELECTRIC COMPANY

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SHIELDS L. DALTROFF  
VICE PRESIDENT  
ELECTRIC PRODUCTION

June 5, 1984

Docket No. 50-277  
50-278

Mr. Thomas T. Martin, Director  
Division of Engineering and Technical Programs  
U.S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

Dear Mr. Martin:

Your letter dated May 3, 1984, forwarded combined Inspection Report 50-277/84-08 and 50-278/84-08. Appendix A addresses one item which does not appear to be in full compliance with Nuclear Regulatory Commission requirements. This item is restated below along with our response:

10 CFR 50, Appendix B, Criterion XVI, "Corrective Action" requires that measures be established to assure that conditions adverse to quality are promptly identified and corrected and in the case of significant conditions adverse to quality, the measures shall assure that the corrective action precludes repetition.

Peach Bottom Quality Assurance Plan, Volume III, Program Section, Paragraph 16.1, "Corrective Action" states, in part, that "measures be established to assure that conditions adverse to quality are promptly identified and corrected." PECO defines conditions adverse to quality as ". . . non-conformances to specified requirements."

Contrary to the above, as of March 30, 1984, nonconformances had not been corrected that had previously been identified on three separate occasions in Quality Assurance Audit Reports AP82-27, dated October 25, 1982; AP83-40, dated December 30, 1983; and AP84-13 (draft) regarding inadequate document control for procedures that control safety-related activities. Superseded indices, missing pages, and deleted procedures were some of the problems associated with controlled copies of procedure books.

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This is a Severity Level V violation (Supplement I).

Response

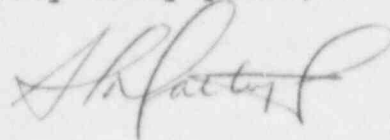
This violation was caused by controlled procedure addressees failing to properly revise their controlled procedure notebooks.

To prevent recurrence, clerical personnel assigned the task of controlled copy notebook review will be reinstructed in the proper maintenance of Peach Bottom Atomic Power Station controlled procedure books. In addition, "Administrative Procedure for Control and Use of Documents, A-2", will be revised to provide improved guidance on proper controlled procedure book maintenance. These actions will be completed by July 30, 1984.

As documented in the response to Quality Assurance Division Noncompliance Reports AP82-27-04, AP83-40-02, and AP84-13-01, the specific inadequacies identified in the Quality Assurance Audit Reports have been corrected.

Should you require additional information, please do not hesitate to contact us.

Very truly yours,



cc: A. R. Blough, Site Inspector