

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-352/84-31

Docket No. 50-352

License No. CPPR-106

Licensee: Philadelphia Electric Company
2301 Market Street
Philadelphia, PA 19101

Facility Name: Limerick Generating Station

Inspection At: Limerick, PA and Philadelphia, PA

Inspection Conducted: June 26 - July 6, 1984

Inspectors: P. K. Eapen
P. K. Eapen, Ph.D. Lead Reactor Engineer

7/31/84
date

E. Thomas Shaub for
P. H. Bissett, Reactor Engineer

7-31-84
date

E. Thomas Shaub
E. T. Shaub, Reactor Engineer

7-31-84
date

Approved by: A. T. Gody for
A. T. Gody, Chief, Management
Programs Section

8/2/84
date

Inspection Summary: Inspection on June 26 - July 6, 1984 Report No. 50-352/84-31

Areas Inspected: Licensee actions on previous NRC findings; Quality Assurance records; plant procedures, design changes, tests and experiments; and maintenance program and procedures. The inspection involved 173 inspector hours on site and 7 inspection hours at the corporate offices by three region based inspectors.

Results: No violations were identified.

DETAILS

1. Persons Contacted

Philadelphia Electric Company (PECO)

J. Basilio, Administrative Engineer (QA)
*D. Clohecy, Quality Assurance Engineer
*J. Connelly, Quality Assurance Engineer
J. Corcoran, Field QA Branch Head
R. Costagliola, Supervising Engineer
*J. Cotton, Engineer, Maintenance
*P. Duca, Jr., Technical Engineer
G. Edwards, Power Generation Engineer
*C. Endris, Regulatory Engineer
K. Folta, QC Engineer
*G. Harmon, Quality Assurance Engineer
R. Hennessy, QC Site Supervisor
H. Hilditer, Supervisor, Document Administration Control
*J. Hunter, Quality Engineer
*G. Lauderback, Jr., QA Engineer
*G. Leitch, Station Superintendent
*A. MacAinsh, QA Site Supervisor
*G. Madsen, Engineer, Independent Safety Engineering Group
*C. Mengers, General Supervisor - QA
J. Muntz
*R. Moore, Superintendent, QA Division
*P. Pavlides, QA Manager
*G. Paptzun, Assistant Maintenance Engineer
*J. Phillabaum, Licensing Engineer

U.S. Nuclear Regulatory Commission

*S. Chaudhary, Senior Resident Inspector
*J. Wiggins, Senior Resident Inspector

*Denotes those present at the exit meeting on July 6, 1984

2. Licensee's Actions on Previous NRC Findings

(Closed) Unresolved Item (352/83-17-03): Analysis of non-rigid piping supports. The inspector reviewed the piping system reanalysis using the non rigid support with the A/E analysts. Assumptions, methodology and results were independently reviewed by the inspector. The stresses obtained from the reanalysis indicated that the system had an adequate margin of safety. The new piping system loads, stresses and accelerations essentially remained unchanged. Based on this review, the item is closed.

(Closed) Violation (352/84-12-01): Failure to establish checklists and acceptance criteria for pre-turnover walkdowns and inspections. The inspector verified that the licensee had instituted all corrective actions as stated in his letter dated May 25, 1984. These corrective actions included:

1. A revision to administrative procedure AD 6.1 to include appropriate qualitative and quantitative acceptance criteria for the system startup engineers' walkdowns and to formally document exceptions identified during walkdowns.
2. Retraining of all system startup engineers.
3. Issuance of training bulletins to provide guidelines for conducting system walkdowns by startup engineers.
4. Revision to Construction Job Rule T-2 to formally document exceptions identified by system startup engineers during walkdowns.
5. Repeat walkdowns for five systems using the new acceptance criteria.

The inspector reviewed the surveillance reports for the repeat system walkdowns. The reports contained several exceptions. However, most of these exceptions were previously identified by Startup Engineering and corrective actions were being taken. The inspector reviewed the newly identified exceptions and noted that these exceptions either occurred after system turnover or could not have been identified by the Startup Engineer during the system walkdown. The inspector has no further questions. The item is closed.

3. QA/QC Involvement in the Areas Inspected

Electric Production (EP) QA Department reviews and approves administrative procedures in all of the areas inspected. The implementing procedures are developed in accordance with the administrative procedures. However, full adherence to the requirements of the administrative procedures was not observed in all the areas (See paragraph 4.5.(4) for details).

Both Engineering and Research and Electric Production QA Departments are adequately prepared to support power operation at Limerick Station.

Routine QA audits are scheduled to assess the effectiveness of various station programs. Corrective actions for audit findings were adequate.

4. Review of Plant Procedures

4.1 General

The inspection was conducted to ensure the licensee has developed procedures to control safety-related operations. The review was limited to the scope and depth of the procedures.

4.2 References

- (1) Technical Specifications, Unit 1 (Proposed)
- (2) Regulatory Guide 1.33-1978, Quality Assurance Program Requirements (Operation)
- (3) ANSI N18.7-1976, Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants
- (4) NRC Generic Letter 82-33
- (5) FSAR Section 13.5, Plant Procedures
- (6) Safety Evaluation Report related to plant operation, including Supplements 1 and 2.
- (7) NUREG-0737, November, 1980, Clarification of TMI Action Plan Requirements
- (8) Emergency Procedure Guidelines, BWR Owners' Group, Revision 2
- (9) NUREG/CR-2005, Checklist for Evaluating Emergency Procedures Used in Nuclear Power Plants, May 1981

4.3 Scope of the Inspection

The inspectors reviewed the licensee's overall procedure control program and the procedures identified in Section 4.4 to assure the following is applicable:

- The procedure program was consistent with the requirements of references (2) and (3) above.
- New procedures and procedure revisions were controlled in accordance with reference (2).
- The emergency procedures were adequate to meet the guidelines of references (7), (8), and (9).

- The procedures were approved in accordance with the requirements of reference (1).
- The procedural steps were clear and concise.
- The overall procedure program provided guidance to the users for handling normal and off normal plant conditions.
- The equipment and controls used in the procedures were correct and identifiable.
- Administrative controls were established for preparation and correction of operating logs, shift turnover and operating log review.
- Operator aids (drawings, charts, graphs, etc) were administratively controlled.

4.4 Procedures Reviewed

4.4.1 Administrative Procedures

- A-2, Procedure for Control of Procedures and Certain Documents
- A-3, Procedures for Temporary Changes to Approved Procedures
- A-5, Procedure for Safety Evaluations
- A-7, Shift Operations
- A-19, Procedure for Preparation and Control of Maintenance Procedures
- A-20, Procedure for Preparation and Control of System Operating Procedures
- A-22, Procedure for Preparation and Control of Operational Transient, Off-Normal Event, and Special Event Procedures
- A-47, Procedure for Preparation and Control of Surveillance Test Procedures
- A-93, Procedure for Preparation and Control of General Plant Procedures
- A-94, Procedure for Preparation and Control of Transient Response Implementation Plan (TRIP) Procedures

-- A-95, Operator Aids

4.4.2 General Operating Procedures

-- GP-1, Preparation for Normal Plant Startup

-- GP-2, Normal Plant Startup

-- GP-2, Appendix I, Reactor Startup and Heatup

-- GP-5, Power Operations

-- GP-11, Reactor Protection System Scram-Reset

4.4.3 System Operating Procedures

-- S11.1.A, Alignment of EWS System

-- S43.2.A, Shutdown of a Recirculation Pump

-- S43.1.A, Startup of the Recirculation System

-- S55.1.A, Normal HPCI Line-Up for Automatic Operation,
and associated check-off list (COL)

-- S58.1.A, Placing the Containment Hydrogen Recombiners
in "Ready" Mode and associated COL

-- S92.1.N, Diesel Generator Set Up for Automatic Operation

-- S95.2.N, Shutdown of the Diesel Generator

-- S95.2.A, Removing a Station Battery Charger from Service

-- S97.0.A, Operation of the Refueling Platform Bridge
Trolley and Main Hoist

-- S97.0.C, Transfer of Fuel from the Fuel Pool to the
Reactor

4.4.4 Surveillance Procedures

-- ST-2-041-044-1, NS4 - Main Steam Tunnel Temperature -
High; Division 1A; Channel A calibration (TE-41-1N010A,
TTS-41-1N605A)

-- ST-2-041-618-1, RPS - Main Steam Line Isolation Valve
- Closure; Division IIA Channel A2 Functional Test
(HV-41-1F022C, D; HV-41-1F028C, D)

- ST-2-042-451-1, RPS and NSSSS - Reactor Vessel Water Level - Low, Level 3, Division IIA Channel A2/c calibration (LF42-1N080C, LIS-42-1N680C)
- ST-2-044-613-1, NSSSS - RWCU Area Temperature - High; Division 11B (Cleanup Pump Room C) Functional Test (ITS-44-1N600DD)
- ST-2-047-400-1, Control Rod Drive Scram Accumulator Level and Pressure Detector/Calibration/Functional
- ST-4-095-921-1, Division I 125 VDC Safeguards Battery 18 Month Inspection
- ST-4-095-954-1, Division IV 125VDC Safeguard Battery 18 Month Service Test
- ST-7-022-324-0, Station Fire Hose Operability Verification
- ST-6-092-312-1, D12 Diesel Generator Test Run
- ST-6-011-232-0, "B" Loop ESW Pump, Valve and Flow
- ST-6-073-330-1, Rod Sequence Control System Operational Verification
- ST-6-076-360-1, Reactor Enclosure Secondary Containment Integrity Verification
- ST-6-091-450-1, Offsite 13.2KV Source Alignment and Voltage Check
- ST-6-092-311-1, D11 Diesel Generator Operability Test Run
- ST-6-095-911-1, Division I 125/150 VDC Safeguard Battery Quarterly Inspection
- ST-6-107-760-1, Control Rod Exercise

4.4.5 Maintenance Procedures

- PMQ-500-012, Preventive Maintenance Procedure for Overhaul of Q-Listed Limitorque Valve Operators, Type HOBC through H3BC
- PMQ-093-004, Preventive Maintenance Procedure for 480 VAC Q-Listed Magnetic Starters
- PMQ-056-011, Preventive Maintenance Procedure for HPCI Turbine Overspeed Trip Device Examination and Overhaul

- PMQ-050-002, Preventive Maintenance Procedure for RCIC Pump Overhaul and Wear Ring Replacement
- PMQ-051-004, Preventive Maintenance Procedure for Residual Heat Removal Pump Motor Installation
- PMQ-500-005, Preventive Maintenance Procedure for Anchor-Darling and Velan Bolted Bonnet and Pressure Seal Gate Valve Repair
- PMQ-048-001, Preventive Maintenance Procedure for Q-listed Standby Liquid Control Pump Plunger Packing Replacement
- PMS-055-001, Preventive Maintenance Procedure for HPCI Turbine Exhaust Stop Check Valve
- PMQ-050-012, Preventive Maintenance Procedure for RCIC Pump Coupling Alignment
- PMQ-092-001, Preventive Maintenance Procedure for Q-Listed 4KV Switchgear
- PMQ-093-001, Preventive Maintenance Procedure for Q Listed 480 VAC Load Centers
- PMQ-500-006, Preventive Maintenance Procedure for Bearing Oil Change of Q-Listed Pump and Motors
- Maintenance (M)-003-001, Diesel Generator Eighteen Month Examination and Maintenance
- M-098-001, Reactor Enclosure Crane Periodic Inspection and Maintenance
- M-041-003, Maintenance Procedure for the MSIV Air Cylinder and Oil Dashpots
- M-041-026, Steam Line Plug Removal

4.4.6 Trip Procedures

- T-99 (Rev. 0) Post Scram Restoration
- T-100 (Rev. 0) Trip Procedure
- T-101 (Rev. 0) RPV Control
- T-111 (Rev. 0) Level Restoration
- T-112 (Rev. 0) Emergency Blowdown

- T-116 (Rev. 0) RPV Flooding
- T-117 (Rev. 0) Level/Power Control
- T-210 (Rev. 0) CRD System SBL Injection Procedure
- T-212 (Rev. 0) RWCU System SLC Injection Procedure
- T-220 (Rev. 0) Control Rod Insert/Withdraw Block Bypass Procedure
- T-231 (Rev. 0) RHR SW to Suppression Pool Procedure
- T-241 (Rev. 0) Alternate injection from condensate or refueling water transfer systems
- T-250 (Rev. 0) Remote Manual Primary Containment Isolation

4.4.7 Off Normal Procedures

- ON-100 (Rev. 0) Failure of a Jet Pump
- ON-105 (Rev. 0) Control Rod uncoupled
- ON-108 (Rev. 0) Low CRD Scram Air Pressure
- ON-110 (Rev. 0) Loss of Primary Containment
- ON-111 (Rev. 0) Loss of Secondary Containment

4.4.8 Operational Transient Procedures

- OT-100 (Rev. 0) Reactor Low Level
- OT-103 (Rev. 0) Main Steam Line High Radiation
- OT-110 (Rev. 0) Reactor High Level
- OT-112 (Rev. 0) Recirculation Pump Trip
- OT-116 (Rev. 0) Loss of Condenser Vacuum

4.4.9 Special Event Procedures

- SE-1 (Rev. 0) Plant Shutdown from Outside the Control Room
- SE-4 (Rev. 0) Flood

4.5 Findings

During the procedure review process, the following concerns were noted:

- (1) PMQ-500-005, The acceptance criteria for the QC inspection of the valve did not reference the specification, P303, for cleanliness.
- (2) PMQ-055-001, The sequence of the steps in the procedure precluded step 7.16.8, "Health Physic Survey of Valve Internals" from ever being performed.
- (3) S92.1N, Filling of the Diesel Generator cooling water expansion tank did not require chemistry samples in either of the filling evolutions.
- (4) Format requirements of Procedure A-22 were not strictly followed for T-200 series procedures. For example, procedure T-212 did not contain the required "Return to Normal" section. However, it contained "Purpose" section which was not required by Procedure A-22.
- (5) Procedure A-94 did not adequately address the purpose, approval requirements and the intent of "bases" in T-Series procedures. As a result, procedure A-94 was implemented non-uniformly to different T-Series procedures.

The licensee's representatives acknowledged the above findings and initiated procedure revisions to address the specific concerns. The inspectors reviewed the drafts for procedure revisions and found the drafts to be adequate. The effectiveness of these revised procedures will be reviewed in a subsequent NRC inspection.

5. Design Changes, Modifications Tests and Experiments

5.1 References

- ANSI N18.7 - 1976
- ANSI N45.2.8 - 1975
- ANSI N45.2.11 - 1974
- 10 CFR Part 50.59
- 10 CFR Part 50 Appendix B
- Proposed Technical Specifications
- FSAR Sections 13 and 17

5.2 Program Review

The inspector reviewed the licensee's programs for design changes, facility modifications, and conduct of tests and experiments to verify the following:

- Required QA programs were developed in accordance with the regulatory requirements, industry standards and licensee's commitments.
- Procedures were established for control of design changes, modifications, and tests and experiments.
- Appropriate responsibilities were established and assigned.
- Administrative controls were established to preclude unauthorized activities; assure prompt recall of obsolete documents; and facilitate distribution of approved documents.
- Administrative control procedures were established to revise the plant procedures, the training program and the facility drawings as necessary to reflect any facility changes, as described in this section.
- Proper communication channels were established among participating organizations.
- Provisions were established to transfer the records to the records storage facility.
- Provisions were established to assure that activities are conducted using approved procedures, whenever applicable.
- Post implementation testing and acceptance criteria were established.
- Responsibility and the method for reporting activities to the Nuclear Regulatory Commission were established.

The following documents were reviewed to assure the program complies with the above requirements.

- LGS QA Plan Volume III
- LGS QA Plan Volume IV
- A-14 (Rev. 0) Procedure for Control of Plant Modification
- ERDP 2.1 (Rev. 3) Procedure for Indoctrination and Training of Engineering and Research Department (E&RD) Personnel
- ERDP 3.1 (Rev. 4) Procedure for Handling Q-Listed Modifications

- ERDP 3.4 (Rev. 5) Procedure for Design Control
- ERDP 3.6 (Rev. 8) Procedure for Preparation and Review of Engineering Drawings for Nuclear Plant Modifications

5.3 Findings

At the time of this inspection, the licensee had not started the use of LGS design change program for safety-related modifications. However, the site initiated several non-safety-related minor modifications using this program. A review of three (84-0001, 0005 and 0006) minor modifications indicated that the program provided adequate control.

The following were identified as items requiring resolution:

1. Establish formal training programs for the site modification coordinator and his staff. (352/84-31-01)
2. Review and improve the requirements for implementing a minor modification prior to PORC approval. (352/84-31-02)
3. Revise FSAR section 17.2A.II, item g to be consistent with section 17.2B.II, item h. (352/84-31-03)

Prior to the exit, the licensee discussed an acceptable training program for the station modification coordinator and stated that the program will be established.

Draft revision, for items 2 and 3 above, were also issued by the licensee prior to the exit meeting. These items will be reviewed during future NRC inspections.

Except for the items identified above, the licensee's design change, tests and experiment programs were adequately established in accordance with the statements of the facility's Final Safety Analysis Report.

The effectiveness and adequacy of the implementation of safety-related modifications will be reviewed during future NRC inspections.

6. Maintenance Program and Organization, Station Housekeeping, and Equipment Control

6.1 References/Requirements

- 10 CFR 50, Appendix B, Quality Assurance Criteria for Nuclear Power Plants
- Technical Specifications, Section 6 (draft), dated March 23, 1982
- Final Safety Analysis Report, Section 13, Conduct of Operations

- Final Safety Analysis Report, Section 17, Quality Assurance During the Operations Phase
- Operational Quality Assurance Program, Maintenance - Electrical and Mechanical Section
- Regulatory Guide 1.33 - 1978, Quality Assurance Program Requirements (Operation)
- ANSI N18.7 - 1976, Administrative Controls and Operational Quality Assurance for the Operational Phase of Nuclear Power Plants
- ANSI N45.2.1 - 1973, Cleaning of Fluid Systems and Components
- ANSI N45.2.3 - 1973, Housekeeping for the Construction Phase of Nuclear Power Plants

6.2 Program Review

The inspector reviewed the licensee's maintenance program to determine whether:

- preventive maintenance and corrective maintenance programs have been established;
- written procedures have been established for initiating requests for routine and emergency maintenance;
- work control procedures have been established for special processes, fire protection, radiation protection, cleanliness, and housekeeping;
- procedures and responsibilities have been established for equipment control;
- provisions have been established for the coordination of maintenance activities and interface controls among participating organizations;
- personnel will be trained and qualified to perform maintenance activities;
- sufficient staff will be available to perform maintenance activities;
- criteria and responsibilities have been established to identify safety and non-safety-related maintenance activities.
- criteria and responsibilities have been established for designating hold points and for performing work inspections;

- criteria and responsibilities have been established for review and approval of all maintenance requests;
- criteria and responsibilities have been established for verifying work classification and the use of industry-accepted procedures;
- administrative controls have been established to prepare, assemble, review and store the maintenance records; and,
- a program has been established to review the corrective maintenance program, to assess the adequacy of the preventive maintenance program, to identify repetitive failures of parts and components, and to identify design deficiencies.

The inspector examined the following documents to determine whether the requirements cited in paragraph 6.1 above were met:

- Administrative (A)-8. Procedure for Control of Locked Valves
- A-12, Ignition Source Control Procedure
- A-25.1, Preventive Maintenance Program
- A-26, Procedure for Corrective Maintenance and Appendices 1, 2, 3 and 4
- A-28, Procedure for Preparation and Control of Fluid System Cleaning
- A-30, Plant Housekeeping
- A-41, Procedure for Control of Safety-Related Equipment
- A-42, Procedure for Control of Temporary Circuit Alterations
- Maintenance Administrative (MA)-3, Documentation and Control of Maintenance at Oregon Shops
- MA-4, Welder Qualifications and Welding Procedure Qualification
- MA-6, Calibration and Control of Maintenance Division Measuring and Test Equipment
- MA-9, Training and Testing of Maintenance Division Personnel
- MA-16, General Requirements for Training and Certification of Nondestructive Testing Personnel
- MA-18, Control of Activities Affecting Nuclear Plant Housekeeping and Control of Combustibles

- Standard Work Instructions (SWI)-1, Maintenance Division SWI for Splicing of Motor Leads on Nuclear Safety-Related Motors
- SWI-2, Periodic Testing of Stored Quality Assurance Motors
- SWI-4, 460 VAC Motor Repair Specification for OA Motors
- SWI-6, Dye Penetrate Examination
- SWI-14, Scram Discharge Volume Header Ultrasonic Water Level Measurements

6.3 Implementation Review

During this inspection, the inspector reviewed the licensee's maintenance programs and organization. Additionally, the inspector made observations as to the licensee's readiness to fully implement the maintenance programs prior to issuance of a facility operating license (O.L.). Most plant systems are still under the control of the startup group; however, as systems are turned over to the plant, the plant staff is assuming responsibility for their maintenance.

Maintenance activities will be performed by the Maintenance and Instrument and Control (I&C) Departments. The Operations Department will perform equipment control (tagouts) and post-maintenance operational verification testing, and the Operational Quality Assurance Department will perform inspections and documentation review of safety-related maintenance activities.

The licensee will utilize a Computerized History and Maintenance Planning System (CHAMPS) to provide administrative control of maintenance activities. All planning, review and approval are performed on the computer with no paper copy, up to the point of equipment release for actual maintenance. Subsequently, the paper copy of the Maintenance Request Form (MRF) is produced to control work activities. The computer is updated for equipment release, maintenance work completed and operational verification/return to service. Both the paper copy and the computer record are retained.

The Maintenance Request Form provides the interface mechanism for the above organizations. Implementation of maintenance activities and control of organization interfaces will be the subject of a future NRC inspection.

6.3.1 Maintenance Department

The inspector reviewed the licensee's administrative procedures for the performance of corrective and preventive mechanical and electrical maintenance activities, and conducted extensive discussions with the Maintenance Engineer concerning Maintenance Program implementation.

Station Maintenance Engineering and the Maintenance Division staffing were reviewed. The Maintenance Division staffing will consist of a Supervisory Engineer, Staff Engineers and 48 craft personnel including 17 subforeman. The licensee will utilize a maintenance contract with a qualified supplier, to support their maintenance activities.

Training of the Maintenance Division personnel and the contractor personnel were discussed with the Supervising Engineer to ensure adequate training will be provided for the maintenance personnel, both PECO and contractor personnel.

The Station Housekeeping program was reviewed. A Housekeeping Coordinator was appointed to evaluate housekeeping and to ensure timely corrective action for deficiencies noted during the evaluations. Only certain areas of the plant have been turned over to the plant staff to date. The inspector reviewed housekeeping evaluations for several of those areas and verified corrective actions were completed for deficiencies noted.

The licensee is developing PM tasks for Q-listed equipment on a system by system basis. A file is being generated for each piece of equipment that contains the PM task. The task frequency and engineering justification, if it differs from manufacturers recommendations, are documented in the files. Several Q-component files were reviewed to evaluate the licensee process for determining required PM's.

6.3.2 Operations Department

The licensee's administrative procedures for establishment of tagouts for personnel and equipment protection during performance of maintenance activities were reviewed.

The Operations Department is currently implementing separate tagout systems - one for construction; one for startup and test; and one for plant controlled systems. In addition, the inspector discussed the lock valve controls and temporary circuit alteration procedure with the operations staff. Implementation of these programs will be the subject of a future NRC inspection.

6.4 Findings

- 6.4.1 A-26, "Corrective Maintenance Program, addressed the major areas of the maintenance program specified in ANSI N18.7-1976 with the following exceptions.

- (1) Criteria for determining if the equipment structure or component is safety-related, environmentally qualified, and a Class 1E electrical component have not been addressed in A-26.
- (2) Definition of what documents will constitute the final work package to ensure the necessary documents become QA records.
- (3) CHAMPS will provide several ways to trend maintenance activities. Further definition of the trending effort and the use of CHAMPS for trending is required.

The licensee acknowledged the inspector's findings and committed to revising A-26 to address these areas.
(352/84-31-04)

- 6.4.2 The Maintenance Division's administrative procedures and certain Standard Work Instructions need to be revised to address Limerick Station activities. The licensee acknowledged the inspector's finding and committed to revising all Maintenance Administrative Procedure and Standard Work Instructions, numbers 4, 5, 10, 12, 16, 17, 21, 25 and 30 (352/84-31-05).

7. QA Record Program

7.1 References/Requirements

- Proposed Technical Specifications, Section 6.10, Record Retention
- Final Safety Analysis Report (FSAR), Section 17.2.17, Quality Assurance Records
- ANSI N45.2.9-1979, Requirements for Collection, Storage and Maintenance of Quality Assurance Records for Nuclear Power Plants
- Regulatory Guide 1.88, Rev. 2
- ANSI N18.7-1976, Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants

7.2 Program Review/Implementation

The licensee's QA program for records management was reviewed for conformance with the requirements listed in paragraph 7.1 to ensure the following:

- Records program and controls are established to identify the record storage facility, designated custodian(s) in charge of storage facilities, the filing system for record retrieval, a method for verifying records received are in agreement with pre-established checklists, access control to files and accountability maintained when files are removed from storage, and a method for correcting files and disposing of superseded records.
- Responsibilities are assigned to ensure identified QA records will be maintained.
- Requirements for maintaining and retaining Quality Assurance Program records are established.
- Responsibilities are assigned and controls are established to assure transfer and retention of preoperational and operational phase records.
- Responsibilities are assigned to establish retention periods for records not covered by the FSAR, Technical Specifications or Title 10 of the Code of Federal Regulations.
- Authority and responsibility for authorizing disposal of records are assigned.

The following procedures were reviewed to determine whether administrative controls have been established:

- A-46, Procedure For Maintenance of Plant Quality Assurance Records
- SSDA-1 Procedure to Control Nuclear Records Management System (NRMS) Procedures
- SSDI-1 Procedure for Creating PECO's Record Copy of Nuclear Related Documents Submitted to NRMS
- SSDI-2 Procedure for Retrieving Information from the NRMS
- SSDI-3 Procedure for Adding Nuclear Related Documents to NRMS
- Budget and Control Division Procedure File No. 3-7(16) "Processing of Nuclear Records"

Various record types were selected and retrieved from the Nuclear Records Management System to verify that the records could be retrieved in a timely fashion. For those records not yet microfilmed, the inspector verified that they were provided suitable protection which included storage within fireproof file cabinets.

7.3 Findings

1. Betchel Power Corporation maintains storage of quality records within a storage vault located onsite. This vault is to be turned over to PECO in the near future. PECO intends to use this vault as an interim storage area for quality records prior to the shipment of these records for permanent storage. At present, there are no written instructions detailing how PECC intends to maintain and control this records' storage area.

The licensee agreed to develop a procedure to establish controls for maintaining this storage area (352/84-31-06).

2. It is the responsibility of each work group to establish temporary storage for quality assurance records (QA) and to forward completed QA records to the Nuclear Records Management System (NRMS) in accordance with A-46, "Procedure for Maintenance of Plant Quality Assurance Records." However, it was determined that A-46 was not referenced in any procedure where the generation of quality assurance records was addressed. PECO has agreed to review all administrative procedures to ensure that A-46 is referenced for record transmittal, where appropriate (352/84-31-07).
3. Appendix 1 of A-46 defines QA records and the groups responsible for maintaining and transmitting them to NRMS. The inspector's initial review of this Appendix indicated that it was not complete.

Subsequently, the licensee initiated a memo randum to all work group supervisors to perform a review of the appropriate section of Appendix 1 to ensure that it included all those QA records required by the Technical Specifications, Code of Federal Regulations, and other governing documents (352/84-31-08).

8. Unresolved Items

An unresolved item is a matter about which more information is required in order to ascertain whether it is an acceptable item, a deviation, or a violation. As discussed in paragraph 2, one previous unresolved item was closed out during this inspection.

9. Exit Meeting

The inspector met with the licensee representatives (denoted in paragraph 1) throughout the inspection period and on July 6, 1984, summarized the scope and findings of the inspection activities.

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