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NUCLEAR ENGINEERING & SERVICES DEPARTMENT

May 4, 1992

Docket Nos. 50-277
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 50-352
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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 of a Change to the
 Quality Assurance Program Descriptions
 Supplemental Information

Gentlemen:

Our letter dated December 13, 1991, requested approval of a change to the Quality Assurance (QA) Program Descriptions incorporated in the Updated Final Safety Analysis Reports (UFSARs) for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, and Limerick Generating Station (LGS), Units 1 and 2. The December 13, 1991 letter submitted proposed changes to the QA Program Descriptions by including the marked-up affected pages from the PBAPS and LGS UFSARs. As a result of subsequent discussions with J. Caruso, NRC Region I, and NRC letters dated January 27, 1992, this letter submits revised changes to certain of the affected UFSAR pages. The remaining marked-up UFSAR pages provided by our December 13, 1991 letter are unaffected by the revised changes. In addition, we have modified the commitment concerning a biennial audit of the procedural development program proposed in our December 13, 1991 letter as described below and reflected in the marked-up UFSAR pages provided in the attachments.

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The specific UFSAR pages incorporating the revised changes are provided in Attachments 1 and 2 for PBAPS and LGS, respectively. The revised changes involve delineation of the programs and processes described in our December 13, 1991 letter that assure procedures are maintained current in lieu of scheduled periodic procedure reviews. The primary mechanism to validate that the delineated programs and processes are maintaining the procedures is our assessment process. This process is comprised of both individual organizational self-assessments and the independent assessments conducted by the Nuclear Quality Assurance organization. These assessments will provide a high degree of confidence that the delineated programs and processes are effective in maintaining procedures current.

If you have any questions or need additional information, please contact us.

Very truly yours,



G. J. Beck, Manger
Licensing Section

Attachments

cc: T. T. Martin, Administrator, Region I, USNRC w/attachments
J. J. Lyash, USNRC Senior Resident Inspector, PBAPS w/attachments
T. J. Kenny, USNRC Senior Resident Inspector, LGS w/attachments

ATTACHMENT 1

Peach Bottom Atomic Power Station

PBAPS

- 17.2.4.7 The Materials Section and Purchasing Department shall only process approved requisitions in accordance with PECO procurement procedures and policies.
- 17.2.4.7.1 The Purchasing Department shall not alter the technical information or quality assurance requirements on a requisition of any procurement classification identified as QS, QV, QD or NX item without, specifically requested prior, written approval of the requisitioning organization.
- 17.2.4.8 The procurement document for QS and QV items shall include a provision for the right-of-access to vendor facilities for inspection or audit purposes.
- 17.2.4.9 Procurement documents shall be maintained in accordance with Section 17.2.17.
- 17.2.5 Instructions, Procedures, and Drawings
- 17.2.5.1 Activities associated with the implementation of the Nuclear Quality Assurance Program shall be described and accomplished in accordance with appropriate instructions, procedures, and drawings. *Administrative procedures shall be written for safety related activities and approved by the appropriate management. QA shall review and approved administrative procedures.
- *INSERT A*
- 17.2.5.1.1 PBAPS Administrative Procedures shall be written by the plant staff, reviewed by the PORC, approved by the Plant Manager or an appointed designee and the site Quality Manager - NQA, and distributed to predetermined personnel.
- 17.2.5.1.2 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. Exhibit XI delineates the manner in which the criteria of 10CFR50, Appendix B, are implemented for each plant activity.

PBAPS

APPENDIX 17.2A

REGULATORY GUIDES AND ANSI STANDARDS

NUCLEAR GROUP

OPERATIONS PHASE QUALITY ASSURANCE

PECo will follow the QA guidelines included in WASH 1284 (10/26/73), "Guidance on Quality Assurance Requirements During the Operations Phase of Nuclear Power Plants"; WASH 1309 (5/10/74) "Guidance on Quality Assurance Requirements During the Construction Phase of Nuclear Power Plants"; WASH 1283, (5/24/74) "Guidance on Quality Assurance Requirements During Design and Procurement Phase of Nuclear Power Plants" - Rev. 1; and other Regulatory Guides and Industry Standards applicable for operations of PBAPS as described in this Appendix.

The Peach Bottom QA Program is described by the PBAPS QA Plan.

PECo has conducted an extensive review of the above listed WASH documents along with the Regulatory Guides and Industry Standards. The standards were reviewed with respect to those activities occurring during the operational phase that are comparable in nature and extent to related activities occurring during initial design and construction. The recommendations and guidance of the Regulatory Guides and ANSI Standards which are applicable to nuclear plant operations are incorporated in the PBAPS QA Plan. Administrative and implementing procedures affected by any revisions of the PBAPS QA Plan will be revised as required in accordance with Administrative Procedures.

Referenced guides or standards addressed by the Regulatory Guides and ANSI Standards are excluded unless addressed separately.

1. Regulatory Guide 1.8 - 3/10/71, Personnel Selection and Training. Endorses ANSI N18.1 - 1971.

COMPLY

D.11-51

FOR INFORMATION ONLY

Rev. 9, 07/91

- e. ANSI N45.2.4, Section 6.2.1, Equipment Tests, Installed items requiring calibration are controlled through the preventive maintenance computer tracking system. Tags or labels are not affixed to the item to indicate calibration status.

4. Regulatory Guide 1.33 - November 1972, Quality Assurance Program Requirements (Operation).

PECo shall comply with Regulatory Guide 1.33, 11/72, which endorses ANSI N45.2 - 1971 and ANSI N18.7 - 1972 exclusive of other documents referenced.

*INSERT B *

5. Regulatory Guide 1.37 - 3/16/73, QA Requirements for Cleaning of Fluid Systems and Associated Components of Water-cooled NPPs. Endorses ANSI N45.2.1 - 1973.

Decontamination and cleanup of radioactive contaminated systems and components are not included in the scope of this response.

PECo shall comply with Regulatory Guide 1.37 - 3/16/73 and ANSI N45.2.1 - 1973 for those activities occurring during the operational phase that are comparable in nature and extent to related activities occurring during the initial design and construction phase except for the following alternate:

- a. ANSI N45.2.1, Section 3.2, Water Quality Requirements - pH measurements are not required for conductivity values of less than or equal to 1 umho/cm. PECo utilizes pH limits of 5.2 to 8.6 at 25 C, uncorrected for CO₂ and may apply conductivity measurements in place of total dissolved solids.

6. Regulatory Guide 1.38 - 3/16/73, QA Requirements for Packaging, Shipping, Receiving, Storage and Handling of Items for Water-cooled NPPs. Endorses ANSI N45.2.2 - 1972.

PECo shall comply with Regulatory Guide 1.38, 3/16/73, and ANSI N45.2.2 - 1972 for those activities occurring during the operational phase that are comparable in nature and extent to related activities occurring during the initial design and construction phase except for the following alternates:

- a. ANSI N45.2.2, Paragraph 2.7, Classification of Items - PECo does not classify items into the four (4) levels described in this Standard. However, the specific guidance and recommendations which are appropriate to each class are applied to those items packaged, shipped

Insert A

Programmatic controls and processes described in Item 4 of UFSAR Appendix 17.2A are in place to assure that procedures are maintained current. These controls take the place of, and eliminate the need for scheduled periodic reviews and revisions.

Insert B

Add: except for the following alternate:

- a. the following programmatic controls and processes are used to assure that procedures are current. These controls take the place of scheduled periodic reviews.
- Plant modification process.
 - Amendments to the Technical Specifications.
 - Programs governing the identification, documentation, and initiation of procedural improvements.
 - Temporary procedure changes.
 - Nuclear Quality Assurance assessment activities.
 - In-House Event Investigation Program.
 - Operating Experience Assessment Program.
 - Vendor Manual Program.
 - Procedure change tracking and trending process.

Line organizations that have responsibility for procedures or procedure categories will perform biennial self-assessments of the appropriate components that comprise the procedural development program in accordance with established guidelines. These self-assessments will provide a high degree of confidence that the programs and processes identified above are effective in maintaining procedures current. In addition, the Nuclear Quality Assurance (NQA) organization will assess the programs and processes identified above as part of the NQA assessment function that includes audits and surveillances.

ATTACHMENT 2

Limerick Generating Station

LGS UFSAR

17. ANSI N18.7-1976/ANS 3.2, Section 5.2.13.1, Procurement and Document Control, (second sentence) - QA Program requirements or alternate approved methods will be used to ensure quality. Examples of alternates for suppliers without QA programs include: material analysis, sample testing, in-process inspection and monitoring, and design review by PECO.
 18. ANSI N18.7-1976/ANS 3.2, Section 5.2.15, Review, Approval and Control of Procedures - The frequency of review of plant procedures is discussed in UFSAR Section 13.5.*
 19. ANSI N18.7-1976/ANS 3.2, Section 5.2.17, Inspections - The results of inspections are not always subject to a further evaluation. For example, evaluation beyond that given by inspection-level personnel is not normally required for go/no-go and pass/fail type inspections.
 20. ANSI N18.7-1976/ANS 3.2, Section 5.3, Preparation of Instructions and Procedures (last sentence) - The clarification regarding emergency maintenance in Item 12, above, applies.
 21. ANSI N18.7-1976/ANS 3.2, Section 5.3.10, Test and Inspection Procedures, (first paragraph) - The clarification regarding test result evaluations in Item 19, above, applies.
 22. ANSI N18.7-1976/ANS 3.2, Section 5.3.10, Test and Inspection Procedures, (second paragraph, last sentence) - These procedural aspects will be included when appropriate. For example, "as-found condition" is not applicable to all test and inspection procedures.
- d. Regulatory Guide 1.37, March 1973, "Quality Assurance Requirements for Cleaning of Fluid Systems and Associated Components of Water-Cooled Nuclear Power Plants." Endorses ANSI N45.2.1-1973.

Decontamination and cleanup of radioactively contaminated systems and components are not included in the scope of this response.

Proposed

13.5 PLANT PROCEDURES

Safety-related activities performed by the plant staff shall be governed by written and approved procedures of a type appropriate to the circumstances and activity, and shall be carried out in accordance with those procedures. Where appropriate for determining that important activities have been satisfactorily accomplished, quantitative or qualitative acceptance criteria shall be included. PECO utilizes the operating experience gained at PBAPS Units 2 & 3 (BWR units similar to LGS) in the development of the procedures.

As fully described below, PECO has implemented ANSI N18.7 (1976)/ANS 3.2, Section 5 as modified by NRC Regulatory Guide 1.33 (Rev 2), paragraphs C.1 and C.5.b through C.5.j, as these documents apply to operating staff activities, in the preparation, content, and control of procedures. *

INSERT B

Sections 13.5.1.1 through 13.5.1.25 describe administrative procedures. Many of these sections describe how various procedure types (such as maintenance procedures or preventive maintenance procedures) are developed and controlled, whereas other sections describe an administrative process (such as purchasing). ~~Unless stated otherwise in the sections which describe how various procedure types are developed and controlled, the periodic review of the procedures will be on a 2 year basis. Those that will be reviewed with a 5 year frequency are provided with rationale to support this position.~~

~~Each of the rationales rests at least in part upon the position that the mere passage of time is not sufficient reason to review a procedure for adequacy. The ANSI Standard that recommends the 2 year frequency does not provide a basis for the selection of 2 years. Something must occur during the passage of time that would make the review or revision of a procedure an appropriate action to take. It should be noted that controlled reviews of equipment or system modifications result in the review of applicable procedures for the potential effect of the modification. In addition, standard practices regarding review and response to documents such as NRC Pulletins, Circulars and Notices, INFC documents and industry documents that are screened by the Operating Experience Assessment Program and forwarded for action by the plant staff are in place and cause procedures to be reviewed and revised as appropriate in relation to the review of these individual documents.~~

Proposed

Insert A

Add: "except for the following alternative:

- a) programmatic controls and processes described in UFSAR section 13.5 are used to assure that procedures are current. These controls take the place of scheduled periodic reviews."

Insert B

"The following programmatic controls and processes are in place to assure that procedures are maintained current. These controls take the place of, and eliminate the need for, scheduled periodic reviews and revisions."

- Plant modification process.
- Amendments to the Technical Specifications.
- Programs governing the identification, documentation, and initiation of procedural improvements.
- Temporary procedure changes.
- Nuclear Quality Assurance assessment activities.
- In-House Event Investigation Program.
- Operating Experience Assessment Program.
- Vendor Manual Program.
- Procedure change tracking and trending process.

Line organizations that have responsibility for procedures or procedure categories will perform biennial self-assessments of the appropriate components that comprise the procedural development program in accordance with established guidelines. These self-assessments will provide a high degree of confidence that the programs and processes identified above are effective in maintaining procedures current. In addition, the Nuclear Quality Assurance (NQA) organization will assess the programs and processes identified above as part of the NQA assessment function that includes audits and surveillances.