

PHILADELPHIA ELECTRIC COMPANY

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M. J. COONEY
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August 8, 1984

Docket Nos. 50-277
50-278

Inspection Report Nos. 50-277/84-17
50-278/84-15

Mr. Richard W. Starostecki, Director
Division of Project and Resident Programs
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Starostecki:

Your letter of July 10, 1984, forwarded combined Inspection Report 50-277/84-17 and 50-278/84-15. Appendix A of your letter addresses two activities which do not appear to be in full compliance with Nuclear Regulatory Commission requirements. These items are restated below along with our response.

1. 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 are required to 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 "...nonconformances to specified requirements."

Contrary to the above, as of May 18, 1984, nonconformances had not been corrected that had been identified in Quality Assurance Audit Report AP83-40PR

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dated January 26, 1984, and previously in nonconformance report NCR A82-37-01 dated December 15, 1982, regarding failure to review maintenance administrative procedures at the prescribed periodicity.

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

Response

The noncompliance identified in our Electric Production Quality Assurance Division Audit Report AP83-40PR dated January 26, 1984, and in Noncompliance Report (NCR) A82-37-01 issued February 9, 1982, was that several Maintenance Division maintenance administrative (MA) procedures had not been reviewed within the required two (2) year period.

The corrective action taken by our Maintenance Division in response to Quality Assurance Audit Report AP83-40PR, specifically NCR AP83-40-03 was the commitment by the Maintenance Division to review, approve, and submit these outstanding MA procedures to the Electric Production Quality Assurance Division (Quality Assurance Division) for review by September 1, 1984. In addition, as a corrective action to prevent recurrence, Maintenance Division had committed to generate, on a quarterly basis, an internal letter outlining the status of the MA procedure review and approvals for submission to the Maintenance Division's Nuclear Branch Senior Engineer, Engineer-In-Charge (this position has now been incorporated into the job of Nuclear Branch Senior Engineer), and Superintendent of Maintenance to provide improved tracking of the MA procedures. Both the corrective action and the action to prevent recurrence was accepted by the Electric Production Quality Assurance Division on April 25, 1984. In order to further improve the tracking of the MA procedures, the quarterly letter has been replaced by a report which specifically describes the status of each MA procedure. Beginning April 24, 1984, this report has been issued on a biweekly basis to the Maintenance Division's Superintendent of Maintenance and Nuclear Branch Senior Engineer.

Your inspection report of July 10, 1984, refers to five administrative procedures: MA-4, MA-8, MA-11, MA-15, and MA-17.

In accordance with the Maintenance Division's February 18, 1984 response to Quality Assurance Division NCR AP83-40-03, all of these maintenance procedures will be submitted to the Electric Production Quality Assurance Division by September 1, 1984.

The status of our Maintenance Division's review of these specific MA procedures as of August 8, 1984, are as follows:

- 1) MA-4, Revision 6, was reviewed and approved by the Maintenance Division on July 17, 1984 and approved by the Quality Assurance Division on July 25, 1984.
- 2) MA-8, Revision 3, is under review by the Maintenance Division and will be submitted to the Quality Assurance Division by September 1, 1984.
- 3) MA-11, Revision 2, was reviewed and approved by the Maintenance Division on May 8, 1984, approved by the Quality Assurance Division on June 4, 1984, and distributed on June 13, 1984.
- 4) MA-15, Revision 1, is under review by the Maintenance Division and will be submitted to the Quality Assurance Division by September 1, 1984.
- 5) MA-17, Revision 1, was reviewed and approved by the Maintenance Division on May 8, 1984, approved by the Quality Assurance Division on May 29, 1984, and distributed on June 8, 1984.

Philadelphia Electric Company believes that the corrective action initiated by the Maintenance Division in response to the Quality Assurance Division NCR AP83-40-03 has produced a mechanism to prevent recurrence of the audited item AP83-40-03. This mechanism, a biweekly report describing the status of each maintenance administrative procedure, provides the improved tracking necessary to avoid further violation.

2. 10 CFR 50, Appendix B, Criterion XI, "Test Control", requires that measures be established to assure that testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is performed in accordance with written test

procedures which incorporate the requirements and acceptance limits.

Peach Bottom Quality Assurance Plan, Volume III, Program Section, Paragraph 11.1 states, in part, that testing shall be performed in accordance with written test procedures which incorporate or reference acceptance limits contained in design documents. The Activities Section of that Plan, Paragraph 11.4 states that procedures shall be designed to permit evaluation of the system's or component's performance.

Contrary to the above, Surveillance Test Procedures ST 12.15.1-3, ST 12.15.3-3 and ST 12.15.4-3 which partially implement Technical Specification 6.14, which requires a program to reduce leakage of potentially highly radioactive fluids from systems outside containment, contain neither acceptance criteria nor the data on which the evaluation of the system's or component's performance can be evaluated.

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

Response

Technical Specification 6.14, 'Integrity of Systems Outside Containment', requires a periodic visual inspection program to reduce the leakage to as low as practical levels from systems outside containment that would or could carry radioactive fluids during a serious transient or accident. A leakage identification program was initiated and has been implemented to satisfy this requirement. Visual inspection tests are routinely performed to identify and initiate the repair of sources of leakage.

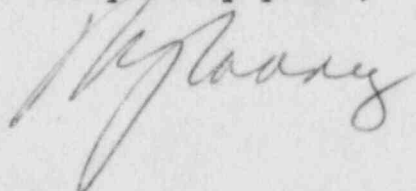
The acceptance criteria (limits) intended in these tests is "any leakage". This pass/fail criteria provides a very conservative approach in defining an action threshold and meets the intent and criteria requirements of Technical Specification 6.14, 10 CFR 50 Appendix B, Criterion XI, and PBAPS Quality Assurance Plan Volume III Paragraph 11.1 and 11.4.

Although these test procedures currently satisfy the criteria requirements of the above mentioned documents, additional procedural detail would enhance evaluations. A revision has been initiated to better indicate the Technical Specification intent within the procedure and

to require a more detailed description of the source, nature, and probable cause of the leakage as well as a leakage rate appraisal. The conservative acceptance criteria, as well as the more detailed leakage description requirements of these tests, will permit adequate evaluation of the urgency of repair of leaking components which are identified during these surveys. The revision will be completed by October 31, 1984.

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

Very truly yours,



cc: A. R. Blough

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