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SHIELDS L. DALTROFF  
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May 25, 1984

Docket No. 50-352

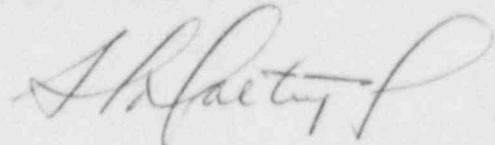
Mr. Thomas T. Martin, Director  
Division of Engineering and Technical Programs  
U.S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

Dear Mr. Martin:

Your letter of April 30, 1984, forwarded Meeting Report No. 50-352/84-33 which discussed the results of an Enforcement Conference held on April 12, 1984, regarding the responsibilities of System Startup Engineers during system turnover at Limerick Generating Station. Appendix A to your letter addresses an apparent violation of NRC requirements. Attachment I restates this item along with our response to that item and to the other concerns identified in the report.

If you should have any further questions, please do not hesitate to contact us.

Very truly yours,



Attachment

cc: J. T. Wiggins, Senior Resident Inspector

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ATTACHMENT I

Apparent Violation

10 CFR 50, Appendix B, Criterion V, states in part:  
"Activities affecting quality shall be prescribed by documented instructions, procedures or drawings --- and shall be accomplished in accordance with these instructions, procedures or drawings. Instructions, procedures or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

Chapter 14 of the Limerick Generating Station's (LGS) Final Safety Analysis Report (FSAR) states that the safety-related initial test program commences with system/component turnover and also identifies the System Startup Engineer's (SSE's) responsibilities during the program.

LGS Quality Assurance (QA) Plan, Operations Phase, which is written to comply with 10 CFR 50, Appendix B, applies to activities affecting the safety-related functions of systems, components and structures. One of the safety-related activities discussed in this plan is the startup activity that commences with the initial turnover of completed systems to PECO from the Architect/Engineer.

Station Procedures AD 6.1 (Revision 4), "System/Component Turnover to PECO", and Bechtel Power Corporation Job Rule 8031-JR-T-2 (Revision 0), "Turnover Logic", implement the requirements of the FSAR and the QA plan.

Contrary to the above, as of March 14, 1984, the procedure AD 6.1 (Revision 4), that prescribed SSE walkdowns for safety-related systems did not include appropriate quantitative and qualitative acceptance criteria for determining that walkdowns were satisfactorily accomplished. Additionally, the SSE's responsibilities to identify and resolve 'turnover exceptions' were not prescribed by documented procedures.

This is a Severity Level IV Violation (Supplement II).

ATTACHMENT I (Cont'd)

Response:

- A. Additional procedural guidance has been provided to the System Startup Engineers by revising Startup Administrative Procedure AD6.1 "System/Component Turnover to PECO" to address:
1. Appropriate qualitative acceptance criteria for the System Startup Engineers' walkdowns;
  2. Requirement for the System Startup Engineer to be notified of items identified on preliminary walkdowns which are not included on the construction punchlist and for the System Startup Engineer to sign and date the construction punchlist during the turnover (final) walkdown acknowledging the turnover exceptions and list content.
- B. To prevent recurrence and ensure that no quality problems exist in systems which have already been turned over the following actions were taken:
1. The system which was the subject to the allegation was walked down again by a team and additional minor deficiencies have been properly recorded;
  2. Training Bulletins addressing the conduct of startup activities have been issued;
  3. Formalized retraining of Startup personnel has been conducted.
  4. The interfacing Construction procedure (Job Rule) related to walkdown deficiency processing was revised to require the signature and date of the System Startup Engineer as discussed in A-2 above.
  5. Four other plant systems, which had previously been walked down, have been walked down again using the new qualitative acceptance criteria (see A.1, above), and no additional significant or generic items that may have been missed on previous turnover walkdowns were identified.

ATTACHMENT 1 (Cont'd)

Further to address NRC concerns expressed in paragraph three of your letter regarding:

- "1) the impact of inadequate SSE walkdowns on safety-related system."

A review of the items identified on the repeat walkdowns revealed that items which may have been overlooked on the System Startup Engineer's turnover walkdown are of the type that would be identified during Preoperational testing or which would not impact safe operation.

- "2) management's ability to determine whether the SSEs are doing acceptable jobs during system turnover."

The performance of System Startup Engineers is monitored by various levels of management. In particular, the timeliness of identification of problems and method of handling the problem prior to performance of a preoperational test provide an indication to management of the Startup Engineer's performance.

- "3) the apparent difference in perception between management and the SSEs, regarding the SSE's responsibilities."

The Startup Administrative Procedure revision, issuance of Training Bulletins and the formalized retraining of SSEs have communicated management's intent to the System Startup Engineers.

- "4) The training program for SSEs."

The results of the repeat walkdowns demonstrate that the SSE training program was adequate. Supplementing this training with the issuance of Training Bulletins formalized retraining and re-examinations has assured Philadelphia Electric Company that the System Startup Engineers are adequately trained and qualified to perform their functions.

DSM DIV 58 IN 3-18  
RECEIVED-REGION 1