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JOHN S. KEMPER
VICE-PRESIDENT
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November 9, 1984

Docket No. 50-277

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 October 12, 1984, forwarded Inspection Report 50-277/84-22 regarding the special NRC Operations Assessment Team inspection of primary system pipe replacement activities on Peach Bottom Unit 2. Appendix A addresses one item which does not appear to be in full compliance with Nuclear Regulatory Commission requirements. Appendices B and C of your letter address, respectively, program strengths and weaknesses of operations and management controls of pipe replacement activities.

The items addressed in Appendix A and Appendix C are restated below along with our response.

Violation (Appendix A)

10 CFR 50, Appendix B, Criterion II, Quality Assurance Program, requires that the program provide for indoctrination and training of personnel as necessary to assure that suitable proficiency is achieved and maintained. Section 2.2 of the licensee's Quality Assurance Plan, Volume I, Revision 7, December 21, 1983, in conjunction with FSAR, Appendix D (17.2B) and ANSI N45.2.6-1978, requires QC inspectors to be (1) medically examined once per year, and (2) re-evaluated for qualification in cases where they have not performed inspection activities within the past year. Licensee procedure CD10.1, Revision 3, February 4, 1984, Procedure for Certification of QC Inspectors, requires yearly recertifications, which include medical examinations and supervisory evaluation of all QC inspectors.

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Contrary to the above, as of July 17, 1984, recertifications have not been completed within the past year for one active QC inspector and one qualified inspector who had been inactive for over one year.

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

Response

Although these individuals were not completely recertified at the time of the inspection, it does not appear that their performance would have compromised the quality of this project. The inspector who had been inactive for over one year was not being utilized to perform receipt inspection. The active inspector had the required medical examination completed in April 1984. However, the completed medical documentation was not forwarded for supervisory evaluation in a timely manner. Upon discovery of these deficiencies, the active inspector was fully recertified as of July 24, 1984, and recertification of the inactive inspector has since been completed.

Philadelphia Electric Company (PECO) Construction Division procedure CD 10.1, "Procedure for Certification of QC Inspectors", requires yearly recertification of all QC Inspectors. Each QC Inspector must be medically qualified by a PECO Medical Department physician and must be qualified through education, training, and experience by the General Superintendent of Construction Division. The intent of the procedure is for the General Superintendent to use the supervisor's evaluation (Exhibit CD 10.1 - III, "Evaluation of Construction Division QC Inspector") as the basis for the General Superintendent's signature on the recertification form.

In order to be current with the supervisor's evaluation as of the date of recertification by the General Superintendent, the supervisor's evaluation was delayed until the medical qualification was signed by Medical Department and returned.

The Construction Division now has the QC Inspector return a signed letter from Medical Department to prove that the QC Inspector has received his medical examination. The Medical Department is contacted in writing and by phone calls to expedite signing of medical qualifications. The QC Inspector is not permitted to perform QC inspections until the signed recertification form is completed.

Since implementation of these actions, one QC Inspector was not permitted to perform inspections from September 30 to October 25, 1984, and a second QC Inspector was not permitted to perform inspections from September 12 to October 25, 1984.

PECo Construction Division is preparing Revision 4 to CD 10.1 which better defines the medical qualification requirements for QC Inspectors. This revision would permit Site Medical Department personnel (a Registered Nurse or Physician's Assistant) to sign the medical qualifications form based upon the revised procedure. In addition, the General Superintendent of Construction Division has instructed the Engineer, QC, to prepare the supervisor's evaluation form (Exhibit CD 10.1 - III) on a timely basis regardless of the medical qualification. This revision will be complete by December 15, 1984.

Weaknesses (Appendix C)

The inspection team has identified items of concern which have been characterized as weaknesses. An item of weakness does not constitute noncompliance with regulatory requirements, rather it is related to effectiveness of a program, activity or organization.

Item 1. Procurement controls/interfaces exhibited a weakness in that:

- GE specifications were used for procurement prior to obtaining PECO approval (para. 7.1).
- The Project Interface Procedures Manual was not issued on a timely basis (para. 7.1).

Response

The GE specifications used to procure material for pipe replacement were issued for procurement in parallel with PECO final review and approval. PECO Mechanical Engineering had reviewed a preliminary copy of the the purchase documents for code acceptability prior to their issuance for procurement. Our later formal comments provided only enhancements beyond code requirements to the original specifications. Pipe procured to the specifications prior to PECO comments would have met all code requirements for use in an ASME Boiler and Pressure Vessel Code Section III, Class 1 system.

The Project Interface Manual which outlines those areas where PECO approval is required was first issued in December, 1983; however, meetings with GE, Bechtel and CBI in the Fall of 1983 defined the approval routines to be used for this job prior to the formal issuance of the manual.

Item 2. Housekeeping in the containment area fluctuated widely. Several unacceptable conditions related to trash accumulation and tool control were noted during the inspection (para. 6.4.1).

Response

The maintenance and execution of housekeeping practices command priority attention within Construction Division management. All Peach Bottom contractors are advised of this fact upon their arrival at the jobsite.

The timing of the Operations Assessment Teams' audit in mid-July coincided with a period of high activity in the Drywell in preparation for piping decontamination.

Because of the undesirable conditions that developed in and around the Drywell, Philadelphia Electric Company Construction Division directed the pipe replacement contractor, Chicago Bridge and Iron (CBI), to hire additional craft laborers to maintain housekeeping in accordance with Section IX (Combustibles and Housekeeping) of the CBI "Job Specific Safety Plan" Recirculation and RHR Pipe Replacement - Unit #2 dated March 29, 1984, and PBAPS Procedure A-30 (Plant Housekeeping Controls) which is referenced in the CBI Safety Plan. CBI, in turn, has re-emphasized the importance of housekeeping in their weekly safety meetings, and enters specific cleanup activities on their shift work list. On each shift, both the CBI Safety Supervisor and the PECO shift inspector perform independent inspections of the Drywell housekeeping conditions and document their findings on separate Inspection Reports. Unacceptable conditions are brought to the attention of the labor foreman for immediate action, and included on the next shift's work list if the cleanup cannot be completed during the shift.

For more organized tool control, shelves have been constructed in the contaminated area outside the Drywell to neatly store tools not immediately required for work in progress.

Finally, in addition to the steps taken by CBI, Philadelphia Electric Company Construction Division has increased surveillance of housekeeping activities. An additional inspector was added to each shift for this monitoring effort and these individuals conduct two to three inspections of the Drywell each shift.

- Item 3. A timely safety review was not completed for the temporary radioactive waste processing system and was not processed through the Plant Operation Review Committee for approval (para. 4.3.2.).

Response

Although not completed at the time of this inspection, a safety review was in place prior to utilizing the facilities. The safety review for the temporary radioactive waste processes and facilities was being written in parallel with the planning and construction of the facility. No use of the facilities for radioactive waste handling or processing occurred and none was planned to occur until the safety evaluation was issued and the Plant Operation Review Committee review completed. Such a review was completed and the facilities placed in use. However, the temporary radwaste building originally planned to be used to process removed pipe was not used for any radwaste processing.

- Item 4. A major concern of the staff was the provisions made by PECO to assure that all plant systems and components that could be impacted by the pipe replacement program were reviewed for configuration and/or damage prior to restart. The project plan does not provide for a final walk down as-built review of the containment areas upon completion of the pipe replacements to assure all damaged equipment is identified and repaired (para. 8.4).

Response

The installation contractor, CBI, has a control procedure, "Control of Site Generated Modifications" (CSGM-1N), for use in tracking drywell equipment which was impacted by the modification. CBI has also instructed all crafts to report any incidental damage or problems which may occur as a result of the work efforts to CBI Supervision in order to take corrective action.

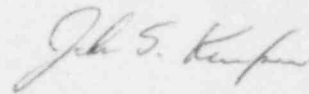
Mr. Thomas T. Martin

November 9, 1984
Page 6

A final walkdown of the drywell will be completed by CBI, PECO Construction Division, and PECO Electric Production Department personnel after all work is done. Also, PECO is in the process of establishing a Drywell Inspection and Recovery Team dedicated to the tasks of ensuring that the integrity of the drywell systems is not compromised due to this modification. The organizational structure of the team is being developed. Staffing of the team has begun with two Peach Bottom engineers and one technical assistant currently assigned. The efforts of the team members to-date have been concentrated on the determination of the scope of work and the preparation of Modification Acceptance Tests (MAT) for use during the restoration phase to ensure that drywell systems are properly restored.

If you have any questions or require additional information, please do not hesitate to contact us.

Very truly yours,



cc: A. R. Blough, Site Inspector