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DMB 014

Dockets Nos. 50-277  
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Mr. Edward G. Bauer, Jr.  
Vice President and General Counsel  
Philadelphia Electric Company  
2301 Market Street  
Philadelphia, Pennsylvania 19101

Dear Mr. Bauer:

SUBJECT: AUDIT PLAN FOR DETAILED CONTROL ROOM DESIGN REVIEW - IN-PROGRAM  
AUDIT OF PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3

As previously discussed with members of the Philadelphia Electric Company's staff, an in-progress audit of the Detailed Control Room Design Review (DCRDR) will be conducted by the NRC staff and its consultants from Science Application Inc. on January 8-11, 1984. The exact locations of this audit will be determined upon your review of the attached audit plan (Enclosure 1) and further discussions between your staff and the NRC.

The purpose of the audit is to clarify certain aspects of the review process, to confirm that the review is being conducted appropriately, and to evaluate the results of the review to date. In preparation for the audit, we would ask that your staff consider the following requests to facilitate our review process:

1. Provide availability of the licensee's review team personnel knowledgeable of the DCRDR tasks/processes and be ready to discuss or respond to NRC Audit Team questions during the audit.
2. Provide documentation of the review results to date, including HEDs identified, and any review materials, such as task analysis, survey and/or inventory checklists and other data collection forms, as part of the audit.
3. Provide for access to the Peach Bottom Control Room Area and to the simulator/control room mockup for the NRC staff and its contractors. The NRC staff also requests clearance to bring camera equipment onsite to take photographs in the control room simulator/control room mockup or other areas which may assist in evaluating the DCRDR and help in documenting the audit. If this request is not feasible, alternative arrangements should be discussed.

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Mr. Edward G. Bauer, Jr.

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4. Provide for conference or office space for both the NRC Audit Team's meeting with the licensee's review team and for the NRC Audit Team to meet privately.

We have enclosed the attached audit plan for your review. We would recommend that a detailed audit agenda based on the enclosed audit plan be prepared by your staff and this agenda should be discussed at the entry briefing on January 8, 1984.

If you have any questions, please contact the NRC Project Manager, Gerry Gears, at 301-492-8362.

Sincerely,

ORIGINAL SIGNED BY  
JOHN F. STOLZ

John F. Stolz, Chief  
Operating Reactors Branch #4  
Division of Licensing

Enclosure:  
As Stated

cc w/enclosure:  
See next page

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JStolz;cf  
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JStolz  
12/13/84

Philadelphia Electric Company

cc w/enclosure(s):

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AUDIT PLAN  
DETAILED CONTROL ROOM DESIGN REVIEW  
IN-PROGRESS AUDIT OF  
PEACH BOTTOM UNITS 2 & 3

ENTRY BRIEFING:

1. NRC

- Provide background for audit  
NRC requirements  
Review results, Peach Bottom's Program Plan
- Define and discuss agenda
- Discuss reporting of audit results

2. PECO

- Define status of DCRDR
- Define modifications to Program Plan, if any
- Define and discuss audit schedule

AUDIT TASKS

1. Audit the DCRDR Team qualifications and the DCRDR Program

- a. Need for formal program of HF orientation and training for non-HF specialists.
- b. Documentation and document control.
- c. Review of results from operating experience review.

2. Audit methods used in the Function and Task Analyses:

- a. Detailed description and discussion of how the operator's information and control needs and their associated characteristics are determined.
- b. Evaluate records associated with (a).

3. Audit results of Task Analyses:

- a. Evaluate a walkthrough/talkthrough (by PECO) of

- emergency procedures in response to a small line break at high reactor pressure with failure of HPCI to initiate.
- b. Conduct debriefing on walkthrough of emergency procedure.
- 4. Audit Control Room Survey:
  - a. Evaluate survey lists and checklists.
  - b. Evaluate survey procedures.
  - c. Evaluate survey team.
  - d. Evaluate review of Remote Shutdown Panel.
- 5. Audit HED Assessment:
  - a. Review methodology used for assessment.
  - b. Evaluate results from assessment process.
  - c. Evaluate schedule of HED corrective actions.
- 6. Audit Selection of Design Improvements:
  - a. Review methodology used to define design improvements.
  - b. Audit specific design improvements.
- 7. Audit Verification activities that illustrate HEDs are corrected.
- 8. Audit Verification activities which illustrate that improvements do not introduce new HEDs.
- 9. Audit coordination of the DCRDR with other Supplement 1, NUREG -0737 initiatives.
- 10. NRC Audit Team evaluation of one or more panels in the Peach Bottom Control Room.

#### EXIT BRIEFING

- 1. NRC
  - State preliminary findings from audit.
  - Discuss reporting of Audit Results.
- 2. PECD
  - Comments on preliminary findings.