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SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

February 5, 1985

Docket Nos. 50-277
50-278

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

SUBJECT: QA Program Description Changes for Peach Bottom Atomic Power Station, Units 2 & 3

REFERENCE: Letter from T. T. Martin to S. L. Daltroff, dated 12/5/84

Dear Mr. Martin:

Attached is Philadelphia Electric Company's resolution of the NRC concerns regarding the PBAPS QA Program changes identified in the reference letter. Included is a copy of all affected page changes. Text changes made on the affected pages are identified by a bar in the left hand margin.

The changes indicated on the affected pages of the Peach Bottom QA Program Description will be incorporated in the next annual update of the PBAPS Final Safety Analysis Report (FSAR), in accordance with the requirements of 10CFR50.71.

Very truly yours,

S. L. Daltroff

Attachment

cc: Dr. T. E. Murley
T. P. Johnson, Sr. Resident Inspector

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ATTACHMENT

1) Concern: In Section 17.2.1.3.2, Electrical Engineering Division, the description of the organization does not reflect the current organization as depicted in the Engineering & Research Department Organization Chart (Exhibit VII).

Resolution: Section 17.2.1.3.2 and appropriate sub-paragraphs have been revised to describe the current Electrical Engineering Division Organization as depicted in the Engineering & Research Department Organization Chart (Exhibit VII).

2) Concern: The Quality Control Group (Section 17.2.1.3.4.4) of the Research & Testing Division is not shown on an organization chart nor does Section 17.2.1.3.4.4 delineate where it reports.

Resolution: Section 17.2.1.3.4.4 has been revised to delineate where the Quality Control Group reports. In addition, an organization chart of the Research & Testing Division has been included as Exhibit IX.

3) Concern: Section 17.2.2.4.2 in the 1983 submittal, which delineates the responsibilities for QA Program revisions, was deleted from the 1984 submittal without justification.

Resolution: Section 17.2.2.4.1 has been revised to include additional information on the approval of PBAPS QA Plan revisions.

4) Concern: Section 17.2.10.2.5 in the 1983 submittal, which addresses surveillance test, was deleted from the 1984 submittal without justification.

Resolution: Section 17.2.11, Test Control, provides sufficient information on Surveillance Tests, including the information that was deleted from Section 17.2.10 of the 1984 submittal. Specifically, see Sections 17.2.11.1 and 17.2.11.1.1 in the 1984 submittal.

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5) Concern: In Section 17.2.15.5, the review of nonconformances by the responsible superintendent and the safety review committees was reduced to only significant nonconformances without justification.

Resolution: It has always been the intent of Section 17.2.15.5 that significant nonconformances, as described in Paragraph 17 of ANSI N45.2-1971, would be reviewed and analyzed by the responsible superintendent, Plant Operations Review Committee (PORC) and Nuclear Review Board (NRB). Therefore, the change in Section 17.2.15.5 was considered by PECo to be editorial in nature, to clarify what was the original intent of this Section.

responsible for reviewing the design of major mechanical power generation equipment and systems.

17.2.1.3.1.4 Power Plant Services Section

The Power Plant Services Section, under the direction of the Engineer-in-Charge, who reports to the Chief Mechanical Engineer, is composed of three Branches: The Station Services Branch, the Energy Services Branch, and the Nuclear Services Branch.

The Power Plant Services Section is responsible for reviewing the design of auxiliary mechanical equipment and systems.

17.2.1.3.1.5 Industrial Section

The Industrial Section, under the direction of the Engineer-in-Charge, who reports to the Chief Mechanical Engineer, is composed of three Branches: the Architectual Branch, the Building Facilities Branch, and the Clerical Branch. The Section is responsible for reviewing the design of ventilation, heating, air conditioning, and fire protection systems.

17.2.1.3.2 Electrical Engineering Division

The Electrical Engineering Division, under the Office of the Chief Electrical Engineer, has responsibility for electrical design of the company facilities and accomplishes its purpose through the design review of plant electrical equipment and components. A Staff Engineer, an Office Branch, and five Sections (Station Engineering, Computer Engineering, Field Engineering, Control Engineering, and Transmission and Distribution Engineering) comprise the Division.

17.2.1.3.2.1 Station Engineering Section

The Station Engineering Section, under the direction of the Engineer-in-Charge, who reports to the Office of the Chief Electrical Engineer, is composed of four

Branches: the Nuclear Generation Branch, the Fossil/Hydro Generation Branch, the Substation Branch, and the Station Equipment Branch. The Station Engineering Branch is responsible for the performance of electrical engineering work of the section.

17.2.1.3.2.2 Computer Engineering Section

The Computer Engineering Section, under the direction of the Engineer-in-Charge, who reports to the Office of the Chief Electrical Engineer, is composed of two Branches: the Computer Applications Branch, and the Engineering Applications Branch. The Branches are responsible for engineering review, design, and consulting functions as they apply to process computers.

17.2.1.3.2.3 Field Engineering Section

The Field Engineering Section, under the direction of the Engineer-in-Charge who reports to the Office of the Chief Electrical Engineer, is composed of three Branches: the Fossil Hydro Branch, the Substation Branch, and the Nuclear Branch.

The Field Engineering Section is responsible for the following:

1. Reviewing the design documents for the Modification and determining, for the Electrical Engineering Division, the testing to be performed by the Field Engineering Section to demonstrate that the Modification will perform adequately in service. The Field Engineering Section may also determine electrical equipment testing to be performed by the Research and Testing Division.

2. Providing instructions/procedures for the performance of testing by Field Engineers

3. Evaluating and accepting or rejecting test results, unless another organization is specified

4. Maintaining a log of reports of nonconformances intitiated by them

17.2.1.3.2.4 Control Engineering Section

The Control Engineering Section, under the direction of the Engineer-in-Charge, who reports to the Office of the Chief Electrical Engineer, is composed of three Branches: The Fossil-Hydro Control Branch, the Nuclear Control Branch, and the Protective Relay Branch. The Branches are responsible for engineering review, design, and consulting functions as they apply to instrumentation control systems and protective relays.

17.2.1.3.2.5 Transmission and Distribution Engineering Section

The Transmission and Distribution Section, under the direction of the Engineer-in-Charge, who reports to the Office of the Chief Electrical Engineer is composed of five Branches: Transmission Project Branch, Distribution Project Branch, Customers Engineering Branch, T&D Equipment Branch, and Structural Equipment Branch. These branches perform engineering review, design and consulting functions for electrical system design.

17.2.1.3.3 Construction Division

The Construction Division is headed by the General Superintendent, who reports to the Office of the Vice President - Engineering and Research, and the Assistant General Superintendent to whom the Electrical Construction Section Superintendent, Mechanical Construction Section Superintendent, and Construction Division Senior Engineer-QC report.

17.2.1.3.3.1 The Electrical and Mechanical Construction Sections' Superintendents are responsible for construction activities performed by their personnel and contractors at PBAPS. The Field Force Branches of the Electrical and Mechanical Construction Sections, headed by the Supervisor - Field Construction, consist of supervisors, foremen, subforeman, and skilled craftsmen of various trades who are responsible for the installation of Modifications implemented by the Construction Division. The

Construction Engineers Branches, headed by the Supervising Engineers, consist of group leaders, construction Engineers, and field assistants who are responsible for planning and scheduling Modifications, and for following work performed by the Field Forces or contractors.

17.2.1.3.3.2 The Construction Division Senior Engineer-QC is responsible for establishing and implementing the Construction Division QC inspections. The Sr. Engineer-QC has no responsibility for scheduling and cost. The qualification requirements for Sr. Engineer-QC include a background in construction practices and procedures and a working knowledge of applicable codes and specifications. The responsibilities of the Sr. Engineer-QC include: preparing, revising and controlling distribution of Construction Division procedures; providing QC indoctrination and training, and overseeing the QC inspection activities of the Construction Division Quality Control Group and providing a liaison between Construction Division and the QA Section. The Construction Division Quality Control Group is responsible for inspecting work performed by the Field Force Branches and for performing receipt inspection of procured safety-related material.

17.2.1.3.4 Research and Testing Division

The Research and Testing Division (Exhibit IX) is under the supervision of the Director of the Research and Testing Division, who reports to the Office of the Vice President - Engineering and Research. The Division is composed of five Sections: the Energy Distribution Research Section, Energy Conversion Research Section, Gas Research and Laboratory Tests Section, System Tests Section, and Station Tests Section; and a Quality Control Group. The Energy Distribution Research and System Tests Sections are not involved with Quality Assurance activities at PBAPS.

17.2.1.3.4.1 Energy Conversion Research Section

The Energy Conversion Research Section is under the supervision of the Engineer-in-Charge who reports to the Director of the Research and Testing Division. The Section supplies consulting services in the areas of metallurgy, nondestructive testing, and welding.

17.2.1.3.4.2 Station Tests Section

The Station Tests Section, is under the supervision of the Engineer-In-Charge, who reports to the Director of the Research and Testing Division, is responsible for conducting tests as assigned to them by Construction Division or by Engineering Work Letter, and for the provision of instructions and procedures needed to accomplish assigned tests.

17.2.1.3.4.3 Gas Research and Laboratory Tests Section

The Gas Research and Laboratory Tests Section, is under the supervision of the Engineer-In-Charge, who reports to the Director of the Research and Testing Division, is responsible for the calibration of measuring and test equipment; for conducting tests in the areas of metallurgical and non-destructive testing; and for testing and evaluating mechanical components, electrical components, and materials as requested by other Divisions of the Engineering and Research Department and other Departments within Philadelphia Electric Company.

17.2.1.3.4.4 Quality Control Group

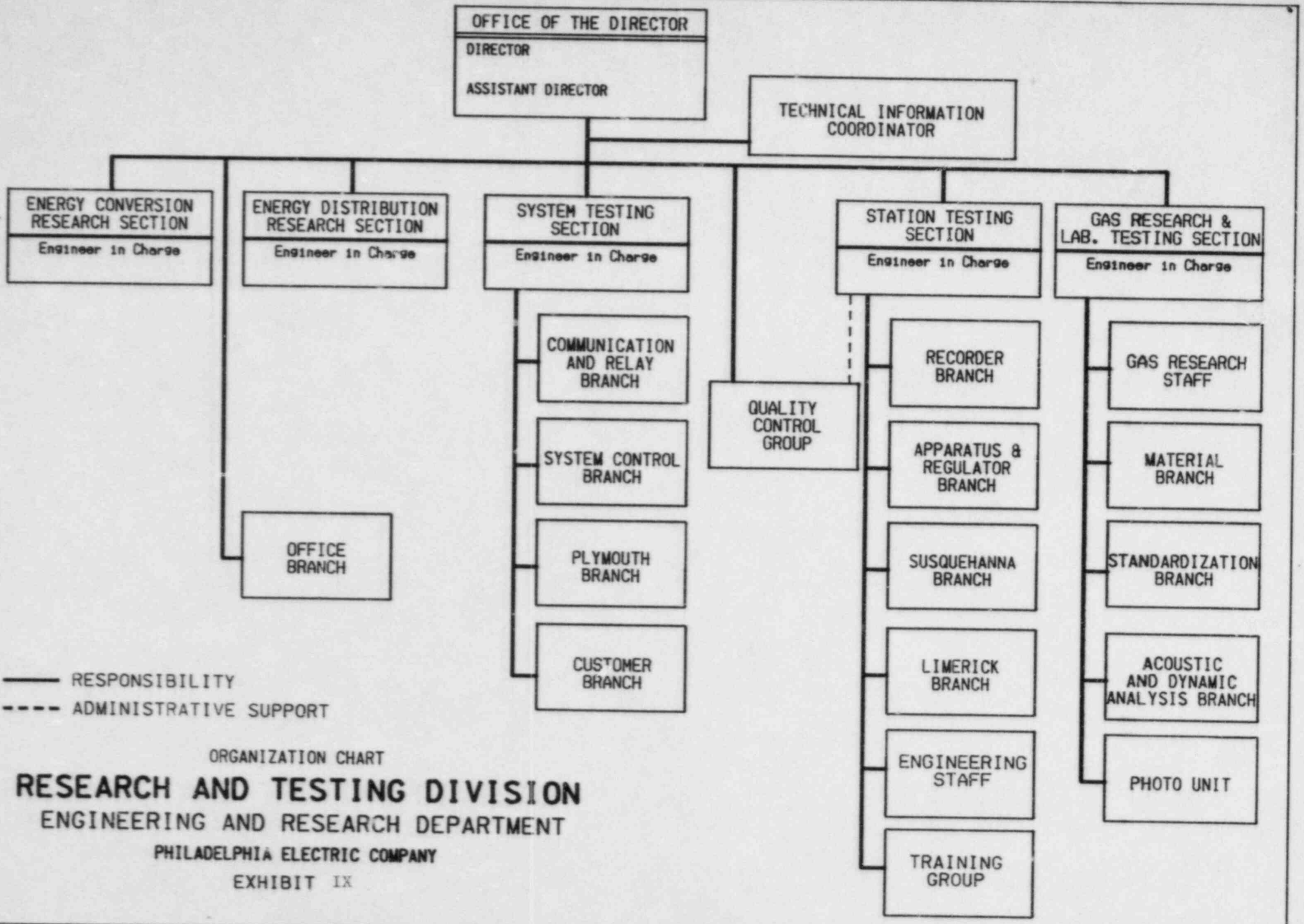
The Research and Testing Division QC Group reports directly to the Office of the Director, Research and Testing Division. The Research and Testing Division QC Group is comprised of appropriate technical disciplines and has no responsibility for scheduling and cost. This group is responsible for inspecting work performed by the field forces and for performing their nonconformance reporting and corrective action responsibilities in accordance with established procedures. The QC Inspectors have the authority to stop unsatisfactory work and to control further processing or installation of nonconforming material. This stop work authority shall be delineated in applicable procedures. Personnel will be assigned to the QC Group on a continual basis and will be

APPENDIX D

QUALITY ASSURANCE PROGRAM

EXHIBITS

Exhibit No.	Title
I	Executive Organization Chart, Philadelphia Electric Company
II	Organization Chart, Electric Production Department, Philadelphia Electric Company
III	Functional Organization Chart, Peach Bottom Atomic Power Station, Electric Production Department, Philadelphia Electric Company
IV	Organization Chart, Quality Assurance Division, Electric Production Department, Philadelphia Electric Company
V	Letter from J. H. Austin to J. S. Kemper and S. L. Daltroff, dated March 15, 1983
VI	Letter from S. L. Daltroff to G. R. Conover, Jr.; M. J. Cooney; A. J. Weigand; W. T. Ullrich; M. J. McCormick, Jr.; E. J. Onley; R. H. Goucher; W. C. Whitfield; R. H. Moore; and W. B. Willsey, dated May 10, 1984
VII	Organization Chart, Engineering and Research Department, Philadelphia Electric Company
VIII	PBAPS Vol. III - Administrative Procedures
IX	Organization Chart, Research and Testing Division, Engineering and Research Department, Philadelphia Electric Company



ORGANIZATION CHART

RESEARCH AND TESTING DIVISION

ENGINEERING AND RESEARCH DEPARTMENT

PHILADELPHIA ELECTRIC COMPANY

EXHIBIT IX

17.2.2.3 The QA Plan applies to activities conducted on systems, components, and structures installed to prevent or mitigate the consequences of an accident which could be harmful to the public. These are designated safety-related equipment and are listed in the latest revision of the PBAPS Project Summary Q-List. Although the measures discussed apply primarily to Q-listed equipment, they may also be applied in varying degrees to non-Q List equipment, such as radiological and environmental monitoring, fire protection, physical security, emergency plans and radioactive waste and material. The application of these quality assurance measures to non-Q systems will additionally enhance operational safety.

17.2.2.4 The Superintendent, Quality Assurance, has the responsibility for maintaining, controlling and distributing the PBAPS OQA Plan to responsible personnel or organizations who perform quality-related functions.

17.2.2.4.1 The PBAPS OQA Plan, including revisions thereto, is approved by the Superintendent, QA; Manager, Nuclear Production; and the Vice President, Electric Production Department.

17.2.2.5 The Quality Assurance Division is staffed with trained and qualified personnel, both on and off site, who are independent of the Nuclear Generation and Maintenance Divisions. The QA Division has the primary responsibility through QA planned and periodic audits and surveillances and QC Inspections and Monitoring of work-in-progress to verify through objective evidence that this Quality Assurance Program is being accomplished in accordance with PBAPS OQA Plan.

17.2.2.5.1 The Training Coordinator-QA, is responsible for developing and maintaining a quality assurance/quality control indoctrination and training program to establish proficiency in quality assurance/quality control and to qualify QA Division