



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

December 31, 1992

Docket Nos. 50-277, 50-278, 50-352
and 50-353

Mr. George J. Beck
Director-Licensing, MC 52A-5
Philadelphia Electric Company
Nuclear Group Headquarters
Correspondence Control Desk
P.O. Box No. 195
Wayne, Pennsylvania 19087-0195

Dear Mr. Beck:

SUBJECT: REVIEW OF PHILADELPHIA ELECTRIC COMPANY'S REQUEST FOR REQUIREMENT TO
AUDIT TECHNICAL SPECIFICATIONS DATED JULY 23, 1992, PEACH BOTTOM
ATOMIC POWER STATION, UNITS 2 AND 3, AND LIMERICK GENERATING
STATION, UNITS 1 AND 2 (TAC NOS. M84556, M84557, M84558, AND M84559)

By letter dated July 23, 1992, the Philadelphia Electric Company (PECo) requested relief from a commitment to audit all major paragraphs of the Technical Specifications (TS) for the Peach Bottom Generating Station, Units 2 and 3 (PBAPS), and Limerick Generating Station, Units 1 and 2 (LGS), over a 4-year period.

PECo has requested relief from its current commitment of auditing all major paragraphs of the LGS and PBAPS Technical Specifications over a 4-year period. This practice was agreed upon by PECo and Region I (Inspection Report No. 50-352/84-56) to resolve a quality assurance program concern expressed in LGS Inspection Report 50-352/84-21. This practice was similarly implemented at PBAPS and is found in PECo Quality Assurance Division Procedures.

Since the implementation of this commitment, the PECo Nuclear Quality Assurance organization has enhanced its oversight capabilities which are composed of performance- and compliance-based assessments, surveillances and monitoring. Each facility also has an independent safety engineering group that examines unit operating characteristics to look for areas to improve plant safety. The NRC has also encouraged licensees to focus more on performance-based assessments and evaluations rather than documentation reviews, as described in NUREG/CR-5151, "Performance-Based Inspections," and in the new Standard Review Plan Section 17.3, "Quality Assurance Program Description."

The Technical Specifications for both LGS and PBAPS require PECo to audit the conformance of unit operations to provisions contained within their Technical Specifications and applicable license conditions at least once per 12 months. Their quality assurance program also states that their audit program will involve compliance-based, performance-based, and technical-based audits, and that audits and surveillances are performed on the basis of importance to

060126

NRC FILE CENTER COPY

9301060287 921231
PDR ADDCK 05000277
P PDR

DF01 10

Mr. George J. Beck

- 2 -

December 31, 1992

safety. However, there is no specific NRC requirement that requires PECO to audit all major paragraphs of the LGS and PBAPS Technical Specifications over a 4-year period.

Based on the licensee's emphasis on performance based audits, assessments and evaluations, and on the Technical Specification requirement to audit the conformance of unit operations to provisions contained within their Technical Specifications at least once each 12 months, the NRC relieves PECO of the specific commitment, documented in Inspection Report 50-352/84-56, to audit all major paragraphs of their Technical Specifications over a 4-year period.

If you have any further questions on this matter, do not hesitate to contact Joe Shea, the NRR Project Manager, at (301)-504-2426.

Sincerely,

Charles L. Miller

Charles L. Miller, Project Director
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

cc: See next page

safety. However, there is no specific NRC requirement that requires PECO to audit all major paragraphs of the LGS and PBAPS Technical Specifications over a 4-year period.

Based on the licensee's emphasis on performance based audits, assessments and evaluations, and on the Technical Specification requirement to audit the conformance of unit operations to provisions contained within their Technical Specifications at least once each 12 months, the NRC relieves PECO of the specific commitment, documented in Inspection Report 50-352/84-56, to audit all major paragraphs of their Technical Specifications over a 4-year period.

If you have any further questions on this matter, do not hesitate to contact Joe Shea, the NRR Project Manager, at (301)-504-2426.

Sincerely,

Original signed by:

Charles L. Miller, Project Director
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

cc: See next page

DISTRIBUTION

| | | |
|------------------|-------------------|------------------|
| Docket File | JShea | CAnderson, RGN-1 |
| NRC & Local PDRs | FRinaldi | NBlumberg, RGN-1 |
| PDI-2 Reading | MO'Brien | GZech |
| SVarga | ACRS(10) | FAIlenspach |
| JCalvo | OGC | |
| CMiller | EWenzinger, RGN-1 | |

| | | | | | | |
|--------|----------|----------|----------|-----------|----------|----------|
| OFFICE | PDI-2/LA | PDI-2/PM | PDI-2/PM | RGN-1 | RGN-1 | PDI-2/D |
| NAME | MO'Brien | JShea:rb | FRinaldi | NBlumberg | GZech | CMiller |
| DATE | 12/11/92 | 12/29/92 | 12/23/92 | 12/29/92 | 12/30/92 | 12/31/92 |

OFFICIAL RECORD COPY
DOCUMENT NAME: PB84556.GEN

per
phone
conversation

Mr. George J. Beck
Philadelphia Electric Company

Peach Bottom Atomic Power Station,
Units 2 and 3

cc:

J. W. Durham, Sr., Esquire
Sr. V.P. & General Counsel
Philadelphia Electric Company
2301 Market Street, S26-1
Philadelphia, Pennsylvania 19101

Mr. Thomas M. Gerusky, Director
Bureau of Radiation Protection
Pennsylvania Department of
Environmental Resources
P. O. Box 2063
Harrisburg, Pennsylvania 17120

Philadelphia Electric Company
ATTN: Mr. D. B. Miller, Vice President
Peach Bottom Atomic Power Station
Route 1, Box 208
Delta, Pennsylvania 17314

Board of Supervisors
Peach Bottom Township
R. D. #1
Delta, Pennsylvania 17314

Philadelphia Electric Company
ATTN: Regulatory Engineer, A1-2S
Peach Bottom Atomic Power Station
Route 1, Box 208
Delta, Pennsylvania 17314

Public Service Commission of
Maryland
Engineering Division
ATTN: Chief Engineer
231 E. Baltimore Street
Baltimore, MD 21202-3486

Resident Inspector
U.S. Nuclear Regulatory Commission
Peach Bottom Atomic Power Station
P.O. Box 399
Delta, Pennsylvania 17314

Mr. Richard McLean
Power Plant and Environmental
Review Division
Department of Natural Resources
B-3, Tawes States Office Building
Annapolis, Maryland 21401

Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, Pennsylvania 19406

Mr. Roland Fletcher
Department of Environment
201 West Preston Street
Baltimore, Maryland 21201

Carl D. Schaefer
External Operations - Nuclear
Delmarva Power & Light Company
P.O. Box 231
Wilmington, DE 19899