

Docket Nos.: 50-277
50-278

FEB 25 1986

MEMORANDUM FOR: Samuel J. Collins, Chief
Project Branch #2
Division of Reactor Projects
Region 1

THRU: Daniel R. Muller, Director
BWR Project Directorate #2
Division of BWR Licensing

FROM: Gerald E. Gears, Project Manager
BWR Project Directorate #2
Division of BWR Licensing

SUBJECT: NRR SALP INPUT - PEACH BOTTOM ATOMIC POWER STATION,
UNITS 2 AND 3

Attached is NRR's input for the March 24, 1986 SALP Board meeting for the Peach Bottom Atomic Power Station, Units 2 and 3. As discussed in the attachment, our evaluation was conducted according to NRR Office Letter No. 44, dated January 3, 1984 and NRC Manual Chapter 0515, Systematic Assessment of Licensee Performance.

Original signed by

Gerald E. Gears, Project Manager
BWR Project Directorate #2
Division of BWR Licensing

Attachment:
As stated

cc w/enclosure
R. Bernero
T. Johnson (Sr. Resident Inspector)

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

Docket Nos. 50-277
and 50-278

FACILITY: Peach Bottom Atomic Power Station, Units 2 and 3
LICENSEE: Philadelphia Electric Company
NRR PROJECT MANAGER: Gerald E. Gears

1. INTRODUCTION

This report presents the results of an evaluation of the licensee, Philadelphia Electric Company, in the functional area of licensing activities. It provides NRR's input to the Peach Bottom SALP review process as described in NRC Manual Chapter 0516. The review covers the period April 1, 1985 to January 31, 1986.

The approach used in this evaluation was to select a number of licensing actions which involved a significant amount of staff effort or which were related to important safety or regulatory issues for the period from April 1, 1985 to January 31, 1986. In most cases, the staff applied the evaluation criterion for the performance attributed based on their first hand experience with the licensee or with the licensee's submittals. Each organization within NRR that was responsible for developing a safety evaluation was obligated to provide a SALP input in accordance with NRR Office Letter No.44. This input was accumulated and used directly. However, for certain licensing actions, an evaluation by the Project Manager was also factored in. Individual SALP evaluations were assembled into a matrix as shown in Appendix A. This matrix was used in combination with appropriate weighting for the importance of the licensing issue to develop the overall evaluation of the licensee's performance.

This approach is consistent with NRC Manual Chapter 0516 which specifies that each functional area evaluated will be assigned a performance category based on a composite of a number of attributes. The single final rating is to be tempered with judgement as to the significance of the individual elements.

2. SUMMARY OF RESULTS

Based on the approach described in the Introduction, the performance of Philadelphia Electric Company for its Peach Bottom facility is rated Category 2 for licensing activities. This is a change from the previous evaluated period in which the licensee was rated Category 1.

3. CRITERIA

Evaluation criteria as given in NRC Manual Chapter 0516, Table 1, were used in this evaluation. Weighting was used to temper the evaluation of individual licensing issues depending upon their importance to safety.

4. PERFORMANCE ANALYSIS

This evaluation represents the integrated inputs of the Project Manager and those technical reviewers who expended significant amounts of effort and /or prepared a Safety Evaluation for the Peach Bottom facility. The composite rating also reflects the comments of the NRR Senior Executive assigned to the Peach Bottom SALP assessment. A written evaluation was circulated to NRR management for comments, which were considered in the final draft.

The basis for this appraisal was the licensee's performance in support of licensing actions that were either completed or had a significant level of activity during the current rating period. These actions included license amendment requests, exemption and relief requests, responses to Generic Letters, TMI and Salem (AIWAS) items, and other actions. Fifty-six (56) licensing actions were completed. Active actions during this period are classified in Attachment A.

In addition to those specific issues, the licensee was evaluated for the overall performance in many day-to-day issues which arise.

5. ASSESSMENT OF PERFORMANCE ATTRIBUTES

This evaluation of the licensee's performance was based on the consideration of the seven attributes specified in NRR Manual Chapter 0526. These are:

- Management Involvement and Control in Assuring Quality
- Approach to Resolution of Technical Issues from a Safety Standpoint
- Responsiveness to NRC Initiatives
- Enforcement History
- Reporting and Analysis of Reportable Events
- Staffing (including Management)
- Training and Qualification Effectiveness

In addition, this evaluation includes an assessment of the licensee's housekeeping practices.

5.1 Management Involvement and Control in Assuring Quality

During this rating period, the licensee's headquarter management has demonstrated an active role in licensing-related activities. Strong management involvement has been especially evident where issues have potential for substantial safety impact and extended shutdowns.

This was especially evident in the Unit 3 refueling and pipe inspection program and reracking of Unit 2 and Unit 3 spent fuel pools. These efforts have represented substantial efforts for both the licensee and NRC's staff and management during this ten month assessment period. Management screening of submittals in these areas was apparent since the submittals were consistently clear and of high quality. Both of these efforts show evidence of prior planning, excellent assignment of priorities and stated, defined procedures for control activities.

However, there are two areas indicating the lack of management attention: timely resolution of NRC initiatives and sporadic quality of Sholly evaluations. Although good effort has been made to initially respond to NRC initiatives in a timely fashion, there appears to be a discernible trend during this report period toward significant delays in followup responses. Three examples are Appendix J Technical Specifications (TSs), purge/vent valves TSs, and diesel generator fuel oil TSs. Concerning Sholly evaluations, there has been a noticeable improvement since the last evaluation period, but overall quality is still highly variable. Additional management attention is required to improve the overall quality in the Peach Bottom Sholly process.

In summary, there was evidence of prior planning and assignment of priorities in major licensing actions, reviews were thorough and technically sound. There was evidence of frequent interfacing between appropriate licensee headquarter staff and the site. The licensee has shown evidence that records are generally complete, well maintained and available. However, there continues to be long delays in the submittals of several long-standing NRC initiatives. Finally, the quality of Sholly evaluations still requires improvements.

Based on the above considerations, the overall rating for this attribute is Category 2.

5.2 Approach to Resolution of Technical Issues From a Safety Standpoint

The licensee's submittals generally showed an understanding of issues, a conservatism in their technical presentations, and viable and generally sound approaches. Resolutions of issues affecting continued operation of the plant or restart were generally timely. However, there are other areas where the resolution of outstanding issues has not been timely. NRC initiated issues of long-standing nature include Appendix J TSs and purge/vent valves TSs. Although the technical approach to resolution of most issues has generally been good, the lack of timely resolutions of certain issues has resulted in the continued backlog of long-standing open items. Based upon the above, the rating for this attribute is Category 2.

5.3 Responsiveness to NRC Initiatives

The licensee generally responded to NRC initiatives in a timely fashion. As reflected in the individual SALP ratings for the multi-plant actions, the licensee has few outstanding regulatory issues and resolution has been initially acceptable in most cases. This is especially true in regards to the licensee's effort concerning the resolution of IGSCC cracking. However, this assessment must be tempered by the fact that there are still long-standing items which require the licensee's responses before they can be closed out (e.g., Appendix J TSs, purge/vent valves TSs). Also there has been a general trend in delayed follow-ups on certain actions which further contributed to the backlog of actions associated with Peach Bottom.

In summary, when considered against the evaluation criteria for this attribute in NRC Manual Chapter 0516, the licensee's initial responses have been generally timely; however, several long-standing actions and issues are still unresolved due to lack of licensee's input.

Based on the above considerations, the rating for this attribute is Category 2.

5.4 Enforcement History

The NRR Project Manager participated in two Enforcement Meetings held at Region 1. Based upon these events plus the Project Manager's review of the Peach Bottom Inspection Reports for the review period, major violations at Peach Bottom are rare and evidence at the Enforcement Meetings appear to indicate that violations result from minor programmatic breakdowns. Corrective actions are usually timely and effective in most cases. However, when actions required licensee's follow-up with NRR (e.g., a TS change), delays in such follow-ups have been evidenced.

Based upon the above, the rating for this attribute is Category 2.

5.5 Reporting and Analysis of Reportable Events

(This input is being developed by the DRAS staff in NRR. Their analysis is currently being prepared and will be sent to the Region under separate cover but in sufficient time to be used by the SALP Board members at the March meeting.)

5.6 Staffing (Including Management)

During this rating period, an effort was made to increase the effectiveness of the Philadelphia Electric licensing staff to accommodate both the Peach Bottom facility and Limerick Generating station which was recently licensed to operate. These changes have resulted in the continued high technical quality of most Peach Bottom submittals. However, the problems of delays and backlogs as discussed above appear to indicate that there may be problems in the staffing area.

Key management positions have been identified with defined authorities and responsibilities, but staffing, although technically competent, appears not to be adequate at times due to difficulties with backlogs.

Based on the above considerations, the rating for this attribute is Category 2.

5.8 Training and Qualification Effectiveness

We have no basis for evaluating this attribute during this report period.

5.9 Housekeeping

Observations made while visiting the site on various occasions during this rating period indicate that the licensee's housekeeping practices are adequate. Areas within the plant facility as well as the outside grounds were generally clean and free of combustibles. Plant personnel appeared to conduct themselves in a professional manner.

Based on the above considerations, the rating for this attribute is Category 2.

6.0 Conclusion

An overall performance rating of Category 2 has been assigned in the licensing area.

Section 042 of the Manual Chapter 0516 defines the meaning of rating the licensee's performance Category 2 as follows: "NRC attention should be maintained at normal levels. Licensee management attention and involvement are evident and are concerned with nuclear safety; licensee resources are adequate and reasonably effective such that satisfactory performance with respect to operational safety or construction is being achieved."

We believe that no less management effort on the part of the

licensee should be exerted in licensing activities. We suggest that more management involvement may be needed to improve response time while maintaining quality. We also conclude that no less NRC attention in the licensing category would be appropriate.

PEACH BOTTOM ATOMIC POWER STATION-SALP REPORT

SALP CATEGORIES*

TYPE	TAC NUMBER	TITLE OF ACTION	SE COMPLT DATE	CAT.1	CAT.2	CAT.3	CAT.4	CAT.5	CAT.6
Multi-plant actions									
M	42922.3	MASONRY WALL DESIGN, IER-90-11	85/06/14C						
M	53027.8	ITEM 3.1.9- POST MAIN. TEST. CHG. TO TS	85/06/28C	1	1	1			
M	53617.8	ITEM 1.2-POST TRIP REVIEW-DATA&INFO CAP.	85/06/02C	3		2			
M	53866.7	ITEM 3.2.3-POST MAINT. TEST.-CHG TO TS	85/06/28C	1	1	1			
M	55606	INS. OF BWR PIPING ACC. TO GL.84-11(PB2)	85/06/06C						
M	55607	INS. OF BWR PIPING ACC. TO GL.84-11(PB3)	85/06/30C						
M	55897.8	DIESEL GENERATOR TS.	85/09/06C	1	1	1			
M	56538.9	RECOMBINER CAPABILITY	85/06/19C		2				
M	56679	PIPING INSP. PROG. FOR 85 REFUELING(PB3)	85/08/30C	1	1	1			
M	57162.3	MARK I DRYWELL VAC. BREAK.(GL 83-08)	85/06/06C		1				
M	59490.1	JUSTIFICATION FOR INTERIM SPOS AND REV.C85	85/12/23C	2	2	2			
M	60227.8	FOLLOW-UP ON ITEM 1.2(GL.83-28)	85/12/23C						

Plant specific actions

P	54357.8	TS CHANGE TO DELETE DRYWELL AIR MONITOR	85/08/16C		2	1			
P	54800.1	REV. OF PROPOSED TS ON AIR SUPPLY	85/07/14C						
P	55157.8	TS CHANGE INVOLVING MANAGEMENT REORG.	85/07/01C	2			2		
P	55174	JET PUMP INTRUMENT NOZZLE CRACKS (UNIT 2)	85/06/06C						
P	55400.1	REVIEW OF SECOND TEN-YEAR ISI/IST PROG.	85/10/15C						
P	55576	CRACKS IN RISER SAFE ENDS (UNIT 2)	85/06/06C						
P	55577	CRACKS IN RISER SAFE ENDS(UNIT 3)	86/01/31	1	1	1			
P	56940.1	ADDITIONAL ISI RELIEF REQUEST(1ST 10 YR)	85/05/14C		1	1			
P	56942.3	REACTOR WATER LEVEL INSTR. LCO TS	85/06/12C	2	2				
P	56949.50	TS CHANGES REL. TO RETS (REVISION 1)	85/09/10C	2	1	1			
P	57237	ADDENDA TO CYCLE 7 RELOAD(UNIT 3)	85/07/03C	2	2				
P	57886.7	EMERGENCY PREPAREDNESS-SCHEDULAR CHANGE	85/07/01C						
P	57897.8	MODIFICATIONS OF ORDERS(6/14/85)-REV.2	85/08/05C						
P	59012	SPENT FUEL POOL EXPANSION	85/12/11	1	1	2			
P	59261.2	TS(S) CHANGES INVOLVING BYPASSING SCRAMS	85/10/31C	1	1	1			
P	59444.5	PURGE AND VENT VALVE STOPS	85/10/24C	2	2	2			
P	59446.7	CONTROL ROOM UPERADE-APP.R (CARPET)	85/10/10C	1	1	1			
P	59448.9	ENERGY ABSORBERS	85/10/29C	2	2	2			
P	59779	EMERG. TS ON LPCI PUMP FLOW	85/11/13C	2	2	2			

TMI actions

T	54928.9	TS CHANGES ON RWL 5 I.I.X.3.16	85/06/06C	2	2	2			
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CALCULATED AVERAGES 1.611111 1.45 1.411764 2 ERR ERR

* Recorded values represent input received by the Project Manager.

Information to be Added to Section 5 of SALP Report
"Supporting Data and Summary"

1. NRR/Licensee Meeting/Site Visits

Site visits: June 12, 1985, November 21, 1985
Meetings: 05/13/85: SALP Board Meeting
05/30/85: "Energy Absorbers"
06/14/85: SPDS
09/05/85: Unit 3 Pipe Cracks
09/17/86: Unit 3 Core Spray Sparger Cracks
10/01/85: Unit 3 Cracks in Safe Ends
10/31/85: N-1 Safe Ends
12/19/85: Cracks in Shroud Head Bolts and Wear Rings

2. Commission
None

3. Scheduler Extensions Granted
08/05/85; submittal of DCRDR Summary Report

4. Relief Granted
05/14/85; ISI Relief

5. Exemptions Granted
None

6. License Amendments Issued

Amendment Nos.109,112 issued June 6, 1985; approves miscellaneous Ts changes
Amendment Nos.110,113 issued July 17, 1985; approves 50.72 & 50.73 reporting requirements
Amendment Nos.111,115 issued October 2, 1985; approves correction of set points and Emerg. Plan Test Freq
Amendment No. 114 issued August 23,1985; Unit 3 Reload
Amendment Nos.112,116 issued November 19,1985; approves changes in coolant leakage detection systems
Amendment Nos.113,117 issued November 19, 1986; Nureg-0737 TSs
Amendment Nos.114,118 issued November 22,1985; administrative control TSs
Amendment Nos.115,119 issued December 10, 1985; revised certain portions of RETS

7. Emergency/Exigent Technical Specifications
None

8. Orders Issued

None

9. NRR/Licensee Management Conferences

None