

PHILADELPHIA ELECTRIC COMPANY

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JOSEPH W. GALLAGHER
VICE PRESIDENT
NUCLEAR SERVICES

10 CFR 2.201

May 25, 1988

Docket Nos. 50-277
50-278

Mr. William F. Kane, Director
Division of Reactor Projects
Region I
U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

SUBJECT: Peach Bottom Atomic Power Station Units 2 & 3
Response to Combined Inspection Report
Nos. 50-277/88-08; 50-278/88-08

Dear Mr. Kane:

Your letter dated April 28, 1988 transmitted Combined Inspection Report Nos. 50-277/88-08; 50-278/88-08 concerning the routine safety inspection conducted at Peach Bottom on March 14-18, 1988. Appendix A of your letter identified one activity which appeared not to have been conducted in full compliance with NRC requirements.

The Attachment to this letter provides a restatement of this item followed by the Philadelphia Electric Company's response.

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

Very truly yours,

JW Gallagher

Attachment

cc: Addressee
W. T. Russell, Administrator, Region I, USNRC
T. P. Johnson, USNRC Senior Resident Inspector
T. E. Magette, State of Maryland

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Restatement of Violation

10 CFR 50, Appendix B, Criterion VI, requires that measures be established to control the issuance of drawings and that drawings be reviewed for adequacy and approved for release for distribution and use at the location where the work will be performed.

Contrary to the above, on March 16, 1988 the inspector identified Emergency Service Water piping being fabricated to sketches that were not in the drawing control system, and showed no indication of approval prior to release.

This is a Severity Level IV violation (Supplement II).

Response to the Violation

Admission or Denial of Alleged Violation:

Philadelphia Electric Company admits that the violation did occur, as described.

Reason for the Violation:

The violation is attributed to weaknesses in the level of understanding of the proper use of fabrication aids and the application of the Quality Assurance Plan by the installation engineers and supervisors. This lack of understanding extended to the craftsmen, resulting in this violation.

The complexity of the design drawings necessitates the use of the simplified sketches in the fabrication process. The Modification Section at Peach Bottom has permitted and encouraged the use of fabrication aids in the shop. These aids have included sketches made by a worker, foreman or installation engineer from the controlled design drawing. These aids facilitate and improve the quality of the fabrication process. A set of controlled design drawings are kept in the shop and are available to the craftsmen at all times.

Extent or Significance:

PECo believes the significance of this violation to be minimal. The extent of the use of uncontrolled drawings was limited to their use as fabrication aids. Direct use of the design drawings in post-fabrication inspections, installation, as well as QA/QC activities was required, therefore, discrepancies would be identified prior to any use of the modification.

Corrective Actions Taken and Results Achieved:

The sketches which were used for this modification were reviewed against the design drawings, verified to be correct and signed by the responsible design engineer and formally issued.

The "Procedure for Control of Drawings (Procedure for Control of Modification Documents)", CD 6.2 was revised and issued on May 20, 1988 to require approval and control of fabrication aids. The engineers, modification/construction supervisors and foremen were instructed in the use of the revised procedures, as well as on the circumstances of this violation. The supervisors in the Modification Section have also received additional training regarding quality assurance and the use of fabrication aids. Training sessions were also conducted to emphasize this to the craftsmen.

Corrective Steps to be Taken to Avoid Future Violations:

The actions which have been taken will avoid future noncompliance.

Date When Full Compliance will be Achieved:

The implementation of the revised procedure and formal personnel instruction were completed on May 23, 1988.