

# PHILADELPHIA ELECTRIC COMPANY

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SHIELDS L. DALTRUFF  
VICE PRESIDENT  
ELECTRIC PRODUCTION

April 9, 1986

Docket Nos. 50-277  
50-278

Inspection Report Nos. 50-277/85-44  
50-278/85-44

Mr. Samuel J. Collins, Chief  
Project Branch 2  
Division of Reactor Projects  
U.S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

Dear Mr. Collins:

Your letter dated February 25, 1986 forwarded Combined Inspection Report Nos. 50-277/85-44; 50-278/85-44 for Peach Bottom Atomic Power Station. Within the scope of this inspection, no violations were noted. However, your letter identified an apparent weakness in the Philadelphia Electric Company Quality Assurance Program and an apparent weakness in the Peach Bottom surveillance testing program. These items are restated below followed by our responses. Philadelphia Electric Company (PECo), by telecon between W. M. Alden (PECo) and R. Martin (NRC), acting for R. Gallo, and W. T. Ullrich with J. E. Beall of your staff, determined that late submittal of this response is acceptable.

## Item 1:

"Inadequate verification of contractor personnel past experience and education was the subject of IE Circular 80-22, "Confirmation of Employee Qualification", October 2, 1980. Philadelphia Electric Company (PECo) does not require its contractors to verify education and experience for certified QC inspectors or conduct its own independent review of education and experience. The lack of review of education and experience is considered a

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weakness in the licensee's QA program and is unresolved (277/85-44-07)."

Response:

IE Circular 80-22 requirements are included in the PECO procurement documents for quality control inspection services. In particular, Revisions 0, 1 and 2 of Specification CD-P-001 (Nuclear Safety Related Specification for Supply of Quality Control Inspector Services) do include IE Circular 80-22 provisions.

In future audits, E&R Quality Assurance Division will evaluate compliance with the PECO purchase order requirements concerning IE Circular 80-22 verifications by contractors who furnish QC inspector services. These actions should remove the weakness identified in Item 1 above.

Item 2:

An apparent weakness in the Peach Bottom surveillance testing program was identified. It appears that neither the Peach Bottom Technical Specifications nor the Site Administrative Procedures address requirements or guidance regarding actions to be taken relative to surveillance tests which are overdue. We are concerned that management controls for the Peach Bottom surveillance testing program may not be adequate with respect to control of overdue surveillance tests and, in some instances, to the tracking of surveillance test completion status.

Response:

We have reviewed our surveillance test program, and we agree with the apparent weakness identified above. A memorandum will be sent by the Plant Manager within the next week to the Supervising Engineers emphasizing that overdue surveillance tests must receive appropriate disposition. A review of the procedural controls for overdue surveillance tests has been initiated. Additions to the appropriate Administrative Procedures will be implemented within 90 days establishing the actions to be taken by station management for overdue surveillance tests.

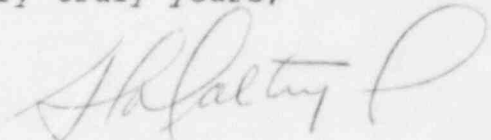
Presently, the surveillance test coordinator issues a weekly surveillance report which specifies those tests which have exceeded the surveillance frequency (but not yet overdue), and those overdue tests which have exceeded the surveillance frequency plus the 25% grace period. This report is issued

to the cognizant groups who perform the surveillance tests and to the cognizant group supervising engineer. Further, a complete list of all overdue tests is distributed to the Plant Manager on a weekly basis. Thus, the surveillance tests, either in the grace period or overdue, receive priority attention for test performance.

Additionally, QA Division will be conducting an Audit of surveillance tests required for the Unit 3 startup which occurred at the completion of the 1985 refueling outage and will be sensitive to this issue.

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

Very truly yours,

A handwritten signature in cursive script, appearing to read "J. H. Falter".

cc: T. P. Johnson, Resident Site Inspector