

October 7, 1988

Docket Nos. 50-277/278

Mr. William Alden  
Director, Licensing  
Philadelphia Electric Company  
2301 Market Street  
Philadelphia, Pennsylvania 19101

Dear Mr. Alden

SUBJECT: REQUEST FOR INFORMATION ON QUALITY ASSURANCE PROGRAM

The staff has reviewed the changes to the Quality Assurance Program description that were described in Revision 6 to the Updated Final Safety Analysis Report and in the letter of Mr. E. P. Fogarty, PECO, to Mr. W. Russell, NPC, dated August 8, 1988 and has identified a need for additional information as stated in the Enclosure.

We suggest that it would be beneficial to discuss these issues in a meeting to be followed by a written response.

Sincerely,

/S/

Robert E. Martin, Project Manager  
Project Directorate I-2  
Division of Reactor Projects I/II

Enclosure:  
As stated

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

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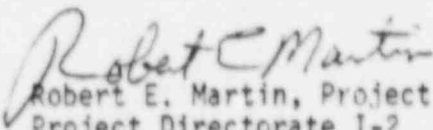
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Robert E. Martin, Project Manager  
Project Directorate I-2  
Division of Reactor Projects I/II

Enclosure:  
As stated

Mr. William M. Alden  
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REQUEST FOR ADDITIONAL INFORMATION  
PEACH BOTTOM UPDATED FSAR REVISION 6  
QUALITY ASSURANCE

- Q-0 Justify the deletion of Figure D.10.1, and clarify NQA's involvement in the PECO fuel quality assurance and nuclear material accountability program.
- Q-1 Section 17.2.1.2 states that the Nuclear Group is supplied maintenance support from other PECO organizations and contractors as necessary. Conversely, Section 13.2.1.1.2 indicates there is a maintenance organization at PBAPS, and Section 17.2.1.2.3.1 indicates that there is a Nuclear Maintenance Division within the Nuclear Services organization of the Nuclear Group. Clarify the responsibilities for PBAPS maintenance and maintenance QA/QC for PBAPS.
- Q-2 Section 17.2.1.2.2 refers to Section 13.2.3 for the PBAPS organization, and Figure 13.2.1 shows the Managers PBAPS Quality and the PBAPS ISEG located offsite. Discuss the pros and cons of offsite versus onsite location for these personnel. (Note that Section 17.2.1.2.4.2 shows the PBAPS ISEG onsite.)
- Q-3 Revision 6, in Section 17.2.1.2.4 has deleted the responsibility of the General Manager, NQA (Ex-Superintendent) to:
4. Review and approve Administrative Procedures which implement the OQA (now NQA) Plan
  5. Approve all Nuclear Operations QA Division Procedures for the implementation of the OQA Plan
- Justify these deletions.
- Q-4 Clarify the auditing/surveillance responsibilities of the Quality Support Division (17.2.1.2.4.4) versus the auditing/surveillance responsibilities of the Peach Bottom Quality Division (17.2.1.2.4.1).
- Q-5 Clarify what MRF stands for in Section 17.2.1.2.4.1.3. (Identified in Section 17.2.15.1 as "maintenance request form.")
- Q-6 Section 17.2.1.2.4.3 describes the duties of the Performance Assessment Division of NQA. Clarify whether there is an annual assessment of NQA which is performed by an entity independent of the NQA organization.
- Q-7 Section 17.2.1.2.6 discusses the PORC. Does NQA audit the PORC? If so, what organization within NQA is responsible for these audits? If not NQA, what organization audits the PORC?
- Q-8 With the PECO reorganization, it is difficult to compare Rev. 6 of the USAR with Rev. 5, and it is important that the margin lines showing where changes occur be accurate. It appears, for example, that Section 17.2.1.2.1 should have a margin line (it doesn't) and that Section

17.2.1.2.2 should not have a margin line (it does). Margin lines should indicate deletions as well as changes and additions. Please verify the correctness of the margin lines in Appendix D.11 of the USAR and make any appropriate changes. Also, please prepare a table of the responsibility assignments in Revision 5 and show to whom (by position title or by organization) each responsibility is assigned in Rev. 6.

- Q-9 Item 14 on page D.11-9 of Rev. 6 introduces an "Evaluated Suppliers List." Discuss the list; that is, how does a supplier get on the list, what would cause the removal of a supplier, etc. (Note reiteration of commitment in Section 17.2.4.5.)
- Q-10 Section 17.2.1.2.4.4.2 indicates the Superintendent of the Engineering Support Section of the Quality Support Division provides "support for the software quality assurance program." Clarify what this support consists of and how it is provided.
- Q-11 The Section 17.2.1.3.1.1 list of organizations which make up the Fossil/ Hydro Generation Division does not include Maintenance, but the list of organizations within this Division does include Maintenance. Clarify.
- Q-12 Clarify the last sentence on page D.11-23 of Rev. 6 which states: "Philadelphia Electric Company executive management mandates that with operations, maintenance, repairing, fueling, or modification activities shall be prepared, executed and verified to assure operational safety."
- Q-13 Section 17.2.2.3 refers to "the latest revision of the PBAPS Project Summary Q-List." Clarify whether this list is given in Table D.2.1 of the SAR.
- Q-14 Section 17.2.2.5 no longer points out the "independence" of NQA personnel. Justify this deletion or replace the commitment.
- Q-15 Section 17.2.2.9.1 limits the Quality Support Manager's review and approval of Administrative Procedures that implement the NQA plan to those that are "site generated." Who (by position title) performs this function for such procedures that are not site generated?
- Q-16 Sections 17.2.2.10 and 17.2.2.11 address the responsibilities of the Manager, Performance Assessment Division and the Manager, Independent Safety Engineering Division, respectively. It appears that these responsibilities have also been addressed in Section 17.2.1.2.4.3 and 17.2.1.2.4.2, respectively. Clarify. Also clarify whether the Independent Safety Engineering Division tracks to completion the recommendations and advice from the ISEGs.
- Q-17 What is the significance of changing Section 17.2.3.3.2 reference from "off-the-shelf" commercially standard items to commercially standard "catalog items?"

- Q-18 The addition of "safety related" to Sections 17.2.4.6 and 17.2.4.7 of the SAR could imply that (1) Nuclear Engineering procurement documents for nonsafety-related modification shall not be controlled and that (2) unapproved requisitions may be processed by Purchasing for nonsafety-related items. Clarify.
- Q-19 Sections 17.2.2.1 and 17.2.2.1.1 and elsewhere refer to the Nuclear Quality Assurance (or NQA) Plan. Sections 17.2.2.3 and 17.2.2.4.1 refer to the "QA Plan." Section 17.2.2.1 refers to the "nuclear Quality Assurance Program, and 17.2.2.2 refers to the "QA Program." Section 17.2.4.9 refers to "this Plan." Sections 17.2.6.2 and 17.2.6.3 refer to the PBAPS QA Plan. Clarify these terms throughout Rev. 6 of the SAR for consistency and clarity. (Revise 17.2.6.3.1 accordingly.)
- Q-20 Sections 17.2.5.1 and 17.2.5.1.1 appear to differentiate between administrative procedures (lower case) and PBAPS Administrative Procedures (capitalized). Section 17.2.5.1.2 refers to "These Administrative Procedures" (capitalized, but without PBAPS). Clarify these terms as for Q-19.
- Q-21 Discuss the significance of adding "tech spec delineated site" to describe implementing procedures and procedure changes in Section 17.2.5.2.1. Are these procedures different from the procedures discussed in Section 17.2.5.1?
- Q-22 Section 17.2.5.3 no longer addresses the distribution of Maintenance Administrative Procedures. Justify or clarify.
- Q-23 Rev 6. has deleted the last subsection of Sections 17.2.5 through 17.2.16 and 17.2.18 which referred to Engineering and Research in Rev. 5. Should there not be comparable sections for Engineering and Production?
- Q-24 Section 17.2.9.1.2 appears to have divided responsibility for control of welding, heat treating, and nondestructive testing initiated by the Nuclear Group and Engineering and Production. Clarify (1) what organization is responsible for controlling these activities and (2) what organization is responsible for controlling these activities when not initiated by the Nuclear Group or Engineering and Production.
- Q-25 Clarify whether there is any conflict or contradiction between 17.2.10.2 and 17.2.10.4 or 17.2.10.4.1
- Q-26 Justify the deletion of the last sentence from Section 17.2.11.8 of Rev. 5.
- Q-27 Section 17.2.15.1 continues to use the term "QA Hold Tag", but Section 17.2.15.2 has changed " 'QA HOLD' tag" to " 'HOLD' tag." Clarify for consistency.
- Q-28 Section 17.2.5.5 refers to "Nuclear Engineering PORC." It appears there should be a comma before PORC.
- Q-29 Clarify which Vice Presidents are referred to in Section 17.2.16.4.

- Q 30 Section 17.2.18.1 (and elsewhere) refers to surveillances and monitorings. Describe the difference(s) between the activities. This section also refers to corrective action as required by audit findings. Clarify that corrective action may also be required by findings of surveillances and monitorings.
- Q-31 Discuss how (as required by Section 17.2.18.5) the General Manager, NQA, can assure timely corrective actions by responsible management or modify the requirement.
- Q-32 With regard to Paragraph 17.4 of N45.2.2 (page D.11-64) of Appendix 17.2A, briefly describe how the PECO approach differs from the guidance.
- Q-33 The text of the Appendix D.11 of the updated FSAR has generally been revised to eliminate differences in the treatment of major and minor modifications. However, the clarification of PECO's commitment to Reg. Guide 1.64 still addresses the categorization of modifications into major and minor. It appears that the clarification may not be required since the word "COMPLY" appears immediately below it. Clarify PECO's commitment to Reg. Guide 1.64 for the PBAPS.
- Q-34 Reinstate the commitment to comply with Reg. Guide 1.74 or justify not doing so.
- Q-35 In updating PECO's commitment to ANSI N45.2.12 from the 1974 to the 1977 revision (Item 19, page D.11-69), the new commitment should address Reg. Guide 1.144, Rev. 1, which endorses the 1977 version.
- Q-36 Differences in the Rev. 5 and Rev. 6 matrices of procedures versus 10 CFR 50 Appendix B criteria are not highlighted with lines in the margin. Verify the correctness of the Rev. 6 matrix and add lines in the margin where appropriate.
- Q-37 The Table of Contents indicates that Section D.12, "Philadelphia Electric Company Maintenance and Modification Quality Assurance Plan," has been incorporated into the Nuclear Quality Assurance Plan, Modification Activity Section. Justify deleting this section from the FSAR.