

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-4000

May 5, 1989

U. S. Nuclear Regulatory Commission  
Attn: Docket Control Desk  
Washington, DC 20555

Docket Nos. 50-352  
50-353

License No. NPF-39  
Construction Permit No. CPPR-107

Subject: Limerick Generating Station, Units 1 and 2  
Nuclear Quality Assurance Program  
Response to Request for Additional Information

Gentlemen:

Enclosed for your review are Philadelphia Electric Company's responses to your informal request for additional information on the Limerick Generating Station Nuclear Quality Assurance Program. Where appropriate, the Final Safety Analysis Report will be revised in a future amendment.

Very Truly Yours,

*G. A. Hunger, Jr.*

G. A. Hunger, Jr.  
Director, Licensing Section  
Nuclear Support Division

Attachment

ERG/ct/05038901

cc: : T. J. Kenny, Senior Resident Inspector, LGS  
W. T. Russell, Administrator, Region I, LGS

Q004  
11

8905220109 E90505  
PDR ADOCK 05000352  
P PNU

ATTACHMENT  
Limerick Generating Station  
Nuclear Quality Assurance Program

Note: . The items of concern have been restated and are followed by resolution of each item.

Item 1:

PECO commitments to QA-related Regulatory Guides 1.28, 1.30, 1.33, 1.37, etc. in FSAR Section 1.8 reference "alternate approaches" in Sections 17.2A and 17.2B. These commitments should refer to Appendix 17.2.II for this information.

Resolution:

Section 1.8 will be revised to incorporate Appendix 17.2.II where applicable.

Item 2:

Regarding the scope of the QA Program, the electrical heating coils of the control room HVAC system were shown as Q-listed on Page 9 of Table 3.2-1 of FSAR Revision 32 but are shown as not Q-listed in FSAR Revision 54. Justify (or reference justification for) this change.

Resolution:

Section 9.4.1.1 states in the second paragraph that the electric heating coils are not safety related. Section 9.4.1.1(h) further amplifies that the electric heating coils are not safety related. The change was made to make Table 3.2-1, in Rev. 47, consistent with Section 9.4.1.1.

Item 3:

FSAR Table 3.2-1 includes a column headed "Q-list." Clarify in FSAR Section 17.2 whether Table 3.2-1 shows the scope of the QA programs. (See Section 17.2.2.1 - 2nd paragraph and 17.2.2.9 - 1st paragraph.)

Resolution:

The second paragraph of Section 17.2.2.1, last sentence will be revised to read " ... are identified through the Project Q-List, Quality Assurance Diagrams, and Table 3.2-1."

Item 4:

Section 17.2.1, "Organization," of the Limerick FSAR Revision 55 approximates the Revision 6 UFSAR for Peach Bottom. Clarify that the response (PECo (Helwig) letter of January 19, 1989 to NRC) to the staff's request for additional information in this regard will be incorporated as appropriate into the Limerick FSAR.

Resolution:

PECo will incorporate all 17.2.1 organizational changes that were made to PBAPS UFSAR into the LGS UFSAR, as applicable, as identified in the letter from D. R. Helwig to the NRC dated 1-19-89.

Item 5:

Item 17.2.1.2.4(e) on page 17.2-7 of FSAR Revision 55 states that the General Manager, NQA, will "Require verification of corrective action and problem resolution for QA-identified deficiencies and CARs." Clarify the responsibility and authority of this position regarding deficiencies and CARs which are not "QA-identified." (See also Question 260.52 and its response regarding this issue.)

Resolution:

1. Hardware nonconformances are written using Nuclear Group Administrative procedure and are processed by NQA. NQA verifies corrective action.
2. NQA writes and processes all CARs per NQA procedures including CARs identified by non NQA personnel.
3. Section 17.2.1.2.4(e) will be revised to read "Require tracking and verification of corrective action and problem resolution for all identified deficiencies and CARs."

Item 6

The list of responsibilities of the General Manager, NQA, on pages 17.2-7 and 17.2-B does not address internal audits and surveillances. Clarify.

Resolution:

1. Internal audits and surveillances are part of the QA program (17.2.1.2.4).
2. Internal audits are performed by the Site Quality Assurance Section [17.2.1.2.4.1.1(b & c)] and by the Corporate Nuclear Quality Division (17.2.1.2.4.4).
3. Section 17.2.1.2.4(p) will be added to read "Administration of internal audits and surveillances."

Item 7:

The commitment at the bottom of page D.11-1 of the Peach Bottom UFSAR 17 that the QA Section Superintendent is responsible to "Approve and issue findings and responses" is not in Revision 55 of the Limerick FSAR. Clarify.

Resolution:

1. Section 17.2.1.2.4.1.1(g) will be revised to read "... audits, surveillances, or QC activities that require ..."
2. Section 17.2.1.2.4.1.1(i) will be revised to read "Issue findings as a result of reviews of NQA audits, surveillances, and QC activities and verify corrective action."
3. Section 17.2.1.2.4.1.2(i) will be added to read "Issue findings resulting from QC activities and verify corrective action."

Item 8:

Clarify QA requirements when spare parts, materials, or services are "obtained via a contractor." (reference Section 17.2.2.7.)

Resolution:

Revise 17.2.2.7, last sentence, to read "... who has been evaluated and is on the EVL."

Item 9:

Regarding QA for fire protection, Item 35 on page 3-38 of the LGS Fire Protection Evaluation Report (Rev. 4, 2/89) addresses QA only during design and construction. Describe measures which ensure an acceptable QA program for fire protection during the operations phase.

Resolution:

Item 35 on page 3-38 of the LGS Fire Protection Evaluation Report will be revised to include the operations phase. This change will be incorporated in a future amendment.

Item 10:

Differentiate between "nonconformances" and "noncompliances" if there is a difference. (See, for example, deletion of nonconformances in Section 17.2.16.4.3 of FSAR Revision 55.)

Resolution:

The following definitions are used in PECO's procedures and QA Plans.

NONCOMPLIANCE - A finding which is in noncompliance with a requirement to the extent that there is a breakdown in managerial or procedural controls in areas of QA criteria, licensing, regulatory requirements or repetitive deficiencies of the same nature.

NONCONFORMANCE - A deficiency in characteristic, documentation or procedure which renders the quality of hardware (material, system, structure or component) unacceptable or indeterminate.

Section 17.2.16.4.3 will be revised to read "The status of noncompliances and nonconformances identified by ..."

Item 11:

FSAR Revision 55 deleted the commitment in 17.2.14 that "altering the sequence of inspections and tests" should be subject to the same (or equivalent) controls as the original review and approval. Justify this deletion or replace the commitment. (See Question 260.49.)

Resolution:

There is no reduction in commitment. Section 17.2.14.2 states exactly the same intent as the deleted part. The words "deviation from" in 17.2.14.2 has the same meaning as "altering the" in the deleted section.

Question 260.49 response will be revised by adding "Deviation from", as used in Section 17.2.14.2, is the same as "altering the sequence of."

Item 12:

Justify deletion of or replace the words "and quality control" in Section 17.2.16.4 regarding corrective action.

Resolution:

Section 17.2.16.4 will be revised to read "I may identify conditions which ..."

Item 13:

FSAR Revision 55 changed the periodic reporting of the status of noncompliances from a "Vice President" to "appropriate management." Clarify who (by position title) constitutes "appropriate management."

Resolution:

Section 17.2.16.4.3 will be revised to read "The status of noncompliances significant nonconformances identified by NQA as a result of monitoring, inspections, audits, or surveillances shall be reported to the Executive Vice President, Nuclear; the responsible Vice President; and the responsible supervision."

Item 14:

The response to Question 260.21 refers to FSAR Sections 17.2.3.2, 17.2.2.3, and 17.2.3.1(f). Section 17.2.3.1(f) states that "the responsible engineering organizations ensure" specific verification actions. Discuss the independence of personnel performing these verifications from the personnel who performed the actions.

Resolution:

1. Section 17.2.3.6.1 describes the independence of design verification in accordance with procedures.
2. Question 260.21 response will be supplemented by adding "The independency of the design review is defined in Section 17.2.3.6.1."

Item 15:

The response to Question 260.30 appears to be in Section 17.2.3.4.1 of Revision 55 of the FSAR. Clarify the response on page 260.30-1 and address the timeliness of preparation of as-built drawings and related documentation.

Resolution:

1. Question 260.30 response will be revised to read "Administrative Procedures have been written which require that modifications be reviewed after completion of the work to determine if the "as-built" installation differs from the original design, and that drawings and documents are revised, if required, to reflect the actual installation in a timely manner according to procedures.

Sections 17.2.3.1, 17.2.3.2, 17.2.3.4.1, 17.2.3.5.1, and 17.2.3.8(j) provide additional information.

2. Section 17.2.3.4.1 will be revised to read "Administrative procedures shall be written which require that modifications be reviewed after completion of the work to determine if the "as built" installation differs from the original design, and that drawings and documents are revised, if required, to reflect the actual installation in a timely manner according to procedures."

Item 16:

Clarify the response to Question 260.31 to indicate whether the establishment of quality and technical procurement requirements is a joint effort of NQA and Engineering personnel.

Resolution:

Quality and technical requirements are generated by the requisitioning organization and reviewed by NQA for appropriate quality requirements.

Question 260.31 response, second paragraph, will be revised to read "Sections 17.2.1.2.4.1.3(k), 17.2.1.2.4.4.2, 17.2.4.1, 17.2.4.5, 17.2.4.6, 17.2.4.7, 17.2.4.9.1, 17.2.4.9.2. provide additional information."

Item 17:

The response to Question 260.26 refers to Section 13.2 which is no longer applicable to the question. Clarify.

Resolution:

Question 260.26 response second paragraph will be revised to read "Sections 17.2.3.2, 17.2.3.3 and 13.2.2.1.3 provide additional information."