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October 19, 1981

Docket Nos. 50-277
50-278

Insp. 50-277/81-12
50-278/81-13

Mr. Thomas T. Martin, Acting Director
Division of Engineering and Technical Inspection
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Martin:

Your letter of September 18, 1981, forwarded combined Inspection Report Nos. 50-277/81-12 and 50-278/81-13. Appendix A addresses several items which do not appear to be in full compliance with Nuclear Regulatory Commission requirements. These items are considered collectively as a single Severity Level V Violation and are restated below with our response.

10 CFR50, Appendix B, Criterion XVI, states, in part, "Measures shall be established to assure that conditions adverse to quality, such as. . .deficiencies, deviations. . .and nonconformances are promptly identified and corrected. . .The measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition. . .the cause of the condition, and corrective actions shall be documented and reported to the appropriate levels of management."

Contrary to the above, management controls to ensure corrective action and the corrective action taken for a previously identified item of noncompliance was

inadequate, in that, the following item of noncompliance identified in our letter dated August 27, 1979 (NRC Combined Inspection 50-277/79-12 and 50-278/79-14 conducted May 21-24, 1979), Notice of Violation Item C, still existed.

Several Maintenance Request Forms (MRF's) used to document the performance of plant maintenance during the period April 29, 1978 through October 27, 1978, identified as open in the MRF Log Book on May 22, 1979 could not be located. This was contrary to the MRF flowpath established in Administrative Procedure A-26. Continued inadequate corrective action concerning this item is evidenced by the following noncompliance:

- a. Technical Specification 6.10.1 states, in part,
". . .b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety (shall be retained for at least five years)
. . ."

Contrary to the above, records of the following maintenance activities which were identified by your staff as having been completed, could not be located during the inspection and appear not to have been retained:

- MRF 2-19-L-0-18, Fuel Pool Cooling High Temperature Alarm Change to 100 F, shown as completed April 18, 1980 by Instrument Shop logs;
- MRF 2-19-M-0-3, Repair "B" Refuel Pump Seal Leakage, shown as completed September 22, 1980 by Maintenance Shop logs;
- MRF 2-19-M-0-4, Repair "A" Refuel Pump Seal leakage, shown as completed September 22, 1980 by Maintenance Shop logs;
- MRF 2-52L-0-33, E-401 Fuel Tank Hi/Lo level alarm will not clear, completion date could

not be determined but shown as completed by Instrument Shop logs;

- Procedure M-10.24, RHR Pump Motor Maintenance, used for performance of MRF 2-10-M-0-65, Install New Motor on RHR Pump 2B, completed July 10, 1980;
- Procedure M-4.12, SRM/IRM Detector Drive Maintenance, used for performance of MRF 3-60-M-0-53, Repair of 3D SRM Drive Unit, completed October 23, 1980; and,
- Procedure M-23.11, High Pressure Coolant Injection (HPCI) Turbine Stop Valve/Hydraulic Cylinder Maintenance, used for performance of MRF 3-23-M-0-18, Disassembly HPCI Turbine Stop Hydraulic Cylinder, completed May 5, 1980.

In addition to the lost records noted above, the following violations were identified concerning the administration of maintenance records:

- b. Technical Specificaiton 6.8.1 states, in part, "Written procedures and administrative policies shall be established (and) maintained. . ."
 - (1) Administrative Procedure A-26, Procedure for Corrective Maintenance, paragraph 3.M states, in part, "Following (its) . . .completion. . .shift supervision shall close out the MRF in the MRF log . . .Placement (of completed MRF's) in the appropriate equipment history file is the responsibility of the staff supervisor. This equipment history file, containing completed original MRF's associated Quality Control Conformance Data Tag, completed maintenance procedures, and A-12 forms shall become part of the permanent station records."

Contrary to the above, the MRF's identified in item "a" above, although identified as completed by your staff,

were not being retained in equipment history file, nor were the MRF's closed out in the MRF log. Additionally, the completed maintenance procedures identified in item "a" above were not being retained in the equipment history file.

- (2) A-26, paragraph 3, specifies the flow path for the original of a MRF from its initiation to final disposition.

Contrary to the above specified flow path, MRF 2-52-1-0-11, E-4 Diesel Generator Cylinder Exhaust Temperature for No. 9 and No. 10 Cylinder-No Readings, initiated January 16, 1980, could not be located and the status of this maintenance could not be determined.

RESPONSE

A detailed review of each of the above record deficiencies was conducted. The details and disposition of this review, for each item, are described below in the order in which they appear in the Notice of Violation.

a.1,2,3. Duplicates of MRFs 2-19-L-018, 2-19-M-0-3, and 2-19-M-0-4 have been retrieved which indicate that the prescribed work was performed. The MRFs have been closed out in the MRF Log Book and the duplicates entered into the records system.

a.4. MRF 2-52-L-0-33 was found to be in the records system. The MRF indicates that the prescribed work was not required, and had been cancelled by the Operations Engineer. The MRF has been closed out in the MRF Log Book.

a.5. Procedure M-10.24 has been retrieved, and entered into the records system.

a.6 MRF 3-60-M-0-53 section 6, Defects Found and Work Performed, was reviewed. When this MRF was initiated, the suspected problem was a defective drive unit. Substantial drive unit work requires the use of procedure M-4.12 and the MRF was filled out accordingly. Upon further investigation by craftsman, the problem was identified as only a broken coupling, which was replaced. Coupling replacement does not require implementation of M-4.12. The practice of specifying implementation of a Maintenance Procedure when it is not possible to positively determine the necessity of its use is employed as a conservative approach to control of maintenance activities.

a.7. MRF 3-23-M-0-18, as well as a related MRF 3-23-M-9-72, were reviewed. Although M-23.11 procedure could not be retrieved, the MRF contains an adequate description of work performed and post maintenance testing.

b.(2) The inability to locate MRF 2-52-L-0-11 at the time of the audit appears to have been a temporary situation. Upon review, it was found that the work prescribed by the MRF had been completed on July 9, 1981. The MRF had been closed out in the MRF Log Book and was retrievable.

As evidenced by this review, Philadelphia Electric Company feels that it is important that these identified MRF documentation deficiencies be placed in perspective. After the fact documentation deficiencies do not effect the manner in which important maintenance activities are conducted at Peach Bottom Atomic Power Station. Maintenance activities on safety related equipment are conducted in an effective and timely manner and documentation is in most cases satisfactory. It is pertinent to note that during 1980, the year from which the eight deficiencies were identified, there were about 8300 Maintenance Request Forms written to initiate corrective and preventative maintenance and modifications.

As shown in the review above, in the event documentation deficiencies of the nature identified in this violation do occur,

other means of documentation are available if required. For the reasons stated above, Philadelphia Electric Company requests that the severity level of this violation be reduced to a Severity Level VI Violation; "violations that have minor safety or environmental significance".

In order to further reduce documentation deficiencies, a periodic review of MRF's which are open in the MRF Log Book will be conducted to ascertain status or disposition and to assure proper documentation.

In addition to the item of non-compliance addressed above, your letter also requested that we provide additional information on implementation of our Nuclear Records Management System (NRMS). Specifically, we are to address those portions of the NRMS which are and are not in compliance with ANSI N45.2.9: "Requirements for Collection, Storage and Maintenance of Quality Assurance Records for Nuclear Power Plants", and provide a date when we will be in full compliance.

A Document Administration Center has been established at Peach Bottom Atomic Power Station to implement the NRMS. All nuclear related documents received at this center are processed in compliance with ANSI N45.2.9 - 1974 with the following exceptions:

Paragraph 3.2.6 Supplemental Information to Quality Assurance Records

Currently a form titled Partial Filming Sheet which is attached in front of supplements or corrections to previously filmed documents is being revised to include an indication of appropriate review, an authorized signature and a date. It will be included in a procedure describing the specific routines followed within the Document Administration Center. We anticipate that this procedure, which has been prepared, will be reviewed and approved by January 4, 1982.

Paragraph 4.3 Receipt Control

Item 3 of the minimum requirements to be included in a receipt control system states "Procedures for receipt and inspection of incoming records."

We have established a procedure titled Processing of Nuclear Records which describes the steps for processing information which is received or prepared by Philadelphia Electric Company with respect to Peach Bottom Atomic Power Station. In addition, the procedure referred to in our comment on paragraph 3.2.6 will include the specific routines for receipt and inspection of incoming records which are followed within the Document Administration Center.

Paragraph 5.3 Storage

The permanent storage of nuclear records on archival quality 16 mm microfilm, of non-microfilmable records, and of illegible records is accomplished in accordance with a Philadelphia Electric Company procedure titled Emergency Records Program. This procedure designates the custodian responsible for enforcing the procedure and specifies our permanent record storage facility as National Underground Storage, Inc., Boyers, PA.

Items 2, 3, 4 and 7 of paragraph 5.3 indicating in part the minimum requirements to be included in a "storage procedure" will be addressed in the procedure referred to in our comment on paragraph 3.2.6 describing the specific routines within the Document Administration Center.

Paragraph 5.7 Audits

Audits of our temporary record storage facility at Peach Bottom have been performed in accordance with the requirements of this ANSI standard, however, we have not yet

audited our permanent facility, National Underground Storage, Inc. This audit will be completed by June, 1982.

Based on our schedule for the items referenced above and our continuing implementation of NRMS, we anticipate that we will be in full compliance with the requirements of ANSI N45.2.9 by June, 1983.

If you have any questions or require additional information, please don't hesitate to call.

Very truly yours,

A handwritten signature in cursive script, appearing to read "A. H. Gattuso". The signature is written in dark ink and is positioned below the "Very truly yours," text.