

PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

955-65 CHESTERBROOK BLVD.

WAYNE, PA 19087-5691

(215) 640-6000

10CFR50.54(a)(3)(ii)

NUCLEAR SERVICES DEPARTMENT

March 3, 1993

Docket Nos. 50-277

50-278

License Nos. DPR-44

DPR-56

U. S. Nuclear Regulatory Commission

Attn: Document Control Desk

Washington, DC 20555

Subject: Peach Bottom Atomic Power Station, Units 2 and 3  
Request for Approval of a Change to the Quality Assurance  
Program Description

Gentlemen:

This letter is submitted in accordance with 10CFR50.54 (a)(3)(ii), which requires prior NRC approval for any change that reduces the commitments in a previously accepted Quality Assurance Program Description (QAPD). Philadelphia Electric proposes to change the QAPD incorporated in the Updated Final Safety Analysis Report (UFSAR) for Peach Bottom Atomic Power Station (PBAPS) Units 2 and 3. As described below, we request your approval to change our commitment under Regulatory Guide 1.88, from ANSI N45.2.9-1974, "Requirements for Collection, Storage and Maintenance of Quality Assurance Records for Nuclear Power Plants," to ANSI N45.2.9-1979. The proposed change would reduce the fire rating of the records storage facility from 4 hours to 2 hours.

The present PBAPS records storage facility meets the current commitment, stated in UFSAR Appendix 17.2A (Item 14) to comply with Regulatory Guide 1.88-1976, which endorses ANSI N45.2.9-1974. ANSI N45.2.9-1974 recommends a four hour minimum fire rating. Industry recognition of the difficulty and added expense in meeting a four hour minimum fire rating is reflected in more recent guidance such as ANSI N45.2.9-1979 and ANSI/ASME, Supplement 17S-1, "Supplementary Requirements for Quality Assurance Records," which permit a two hour minimum rating.

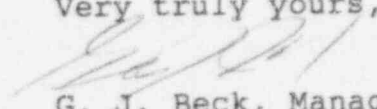
080143

JEH3

The Philadelphia Electric Company (PECo) is constructing a new Administration Building at PBAPS. We plan to move the site records facility into the new building. We propose to take advantage of the current guidance by changing our QAPD to commit to ANSI N45.2.9-1979, with the two exceptions shown in Attachment 1. Our records storage commitment for PBAPS Units 2 & 3 would then be the same as the commitment for our Limerick Generating Station (LGS) Units 1 and 2, as stated in the LGS UFSAR, Appendix 17.2.II.K.

The proposed change to the PBAPS UFSAR QA Program description is provided in Attachment 1. If you have any questions or need additional information, please contact us. If you can inform us of your decision before July 1, 1993, it would be helpful in meeting our schedule for facility construction completion, and transferring the records.

Very truly yours,

  
G. J. Beck, Manager  
Licensing Section

Attachment

cc: T. T. Martin, Administrator, Region I, USNRC w/ attachments  
J. J. Lyash, USNRC Senior Resident Inspector, PBAPS w/ attachments

bcc: R. A. Burricelli, Public Service Electric & Gas	w/o attachment
W. P. Dornsife, Commonwealth of Pennsylvania	"
R. I. McLean, State of Maryland	"
H. C. Schwemm, Atlantic Electric	"
C. Schaefer, Delmarva Power	"
D. M. Smith	w/ attachment
G. R. Rainey	"
D. B. Miller, Jr., PBAPS, SMO-1	"
J. B. Cotton, 53A-1	"
R. N. Charles, 51A-1	"
D. R. Meyers, PBAPS, SMO-1	"
K. P. Powers, PBAPS, A4-1S	"
J. F. Sweeney, 61C-1	"
A. T. Martone, 61B-3	"
R. J. Stipceovich, 62A-7	"
J. A. Basilio, 52A-5	"
A. J. Wasong, PBAPS, A4-1S	"
A. D. Dycus, PBAPS, A3-1S	"
C. J. McDermott, S13-1	"
A. B. Donell, PBAPS, B-2-N	"
J. T. Robb, 62C-3	"
J. W. Austin, PBAPS, A4-4N	"
J. K. Davenport, PBAPS, SMO-1	"
T. K. Furlong, PBAPS, SMO-3	"
Commitment Coordinator, 52A-5	"
Correspondence Control Desk, 61B-3	"
DAC	"

Attachment 1  
Proposed Changes to the  
Quality Assurance Program Description  
for  
Peach Bottom Atomic Power Station  
Units 2 and 3

tests, will be qualified in accordance with ANSI N18.1 - 1971 in lieu of ANSI N45.2.6 - 1978.

- b. ANSI N45.2.6 - 1978, Subsection 3.5 presents experience recommendations for candidates. Experience in maintenance, modification and operating activities is considered related experience since such experience provide training in the safety aspects of the facility.

- 10. Regulatory Guide 1.64 - Revision 1, February 1975, Quality Assurance Requirements for the Design of Nuclear Power Plants. Endorses ANSI N45.2.11 - 1974.

COMPLY

- 11. Regulatory Guide 1.68 - November 1973, Preoperational and Initial Startup Test Programs for Water-cooled NPPs. Does not apply to the Operating Plant with full-term licenses.

- 12. Draft Regulatory Guide 1.70xx - April 1974, Additional Information, QA During Design and Construction.

This draft Regulatory Guide addresses to submittal of FSAR Section 17.1 and does not apply to the operating plant with a full-term license.

- 13. Regulatory Guide 1.74 - February 1974, QA Terms and Definitions, Endorses ANSI N45.2.10 - 1973.

COMPLY

- 14. Regulatory Guide 1.88, Revision 2, October 1976, "Collection, Storage, and Maintenance of Nuclear Power Plant Quality Assurance Records." PECO shall comply with ANSI/ASME N45.2.9-1979, except for the following alternatives.

- a. ANSI/ASME N45.2.9-1979, Section 3.2.6, Supplemental Information to Records - Supplements and corrections to records will be in accordance with procedures, but will not necessarily require review or approval by the organization that originated the record.
- b. ANSI/ASME N45.2.9-1979, Section 5.3, Storage, Item 3. This item implies the use of a transmittal document. Philadelphia Electric Company will use such documents as determined by the type of record being stored.