



PHILADELPHIA ELECTRIC COMPANY

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MAR 11 1983

JOHN S. KEMPER
VICE-PRESIDENT
ENGINEERING AND RESEARCH

Mr. Ronald C. Haynes, Director
United States Nuclear Regulatory Commission
Office of Inspection and Enforcement, Region I
631 Park Avenue
King of Prussia, PA 19406

Subject: US NRC IE Region I Letter dated February 10, 1983
RE: Site Inspection of November 29 - December 10, 1982
Inspection Report No. 50-352/82-16
Limerick Generating Station - Unit 1

File: QUAL 1-2-2 (352/82-16)

Dear Mr. Haynes:

In response to the subject letter regarding items identified during the subject inspection of construction activities authorized by NRC license No. CPPR-106, we transmit the following:

Attachment I - Response to Appendix A
Attachment II - Response to Appendix B

Also enclosed is an affidavit relating to the response.

Should you have any questions concerning these items, we would be pleased to discuss them with you.

Sincerely

JMC/mmk

Attachments

Copy to: Director of Inspection and Enforcement
United States Nuclear Regulatory Commission
Washington, D.C. 20555

S. K. Chaudhary, US NRC Resident Inspector

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ATTACHMENT 1

RESPONSE TO APPENDIX A

Violation

10CFR 50, Appendix B, Criterion VI, the Limerick Generating Station (LGS) Preliminary Safety Analysis Report, Appendix D, Paragraph D.4.13, and the LGS Quality Assurance Plan, Section 6.0, require measures be established to control the issuance of documents affecting quality including changes thereto. Bechtel Power Corporation Engineering Department Procedure (EDP) 4.36, Standard Computer Programs, Revision 1, Section 7.0 requires computer program User's Manuals to have a cover sheet to identify the current program release and to be distributed and controlled such that close-loop verification can be made to assure that holders of program documentation have received all current revisions. EDP 4.36, Section 5.6, requires program documentation revisions to be reviewed and approved.

Contrary to the above, on December 1, 1982, a computer program User's Manual for program ECG-102, Cable Pulling Calculations Using a Programmatic Calculator, did not have a cover sheet to identify the current program release, and was not distributed and controlled such that close-loop verification of receipt of all current revisions could be made, in that uncontrolled photocopies of selected pages were in use to perform activities affecting quality. Additionally, a revision had been made to the manual without documentation indicating appropriate review and approval.

Response to Violation

All copies of computer program user's manuals were retrieved from the Field including the manual identified by the NRC Inspector in this report.

Each computer program manual was reviewed with the following results:

1. The contents of each manual in use was found to be the same revision as those in controlled copies.
2. One copy of a deleted program, ECG101, was found, however, it had never been used by the Field Engineers at Limerick.
3. The hand written change in ECG102 has been removed. The change dealt only with how the registers are cleared before the program cards are fed into the calculator. The change had no affect on the calculation portion of the program and did not affect the results in any way.

It was therefore concluded that completed field design work was not affected by this document control problem.

To resolve this problem and to prevent its recurrence, the following steps have been taken:

1. Uncontrolled copies of computer program manuals were destroyed.
2. Computer program manuals have been placed under controlled distribution by the field document control group and are assigned to specific individuals.

These controls are the same as are in place for the issuance of other design documents in the field such as drawings and specifications. Any revisions to the computer program manuals will be controlled per the field document control procedures.

3. Program users in the field were instructed to use only approved controlled computer program manuals. No uncontrolled copies are to be made or xeroxed.

All of the above actions have been completed and a recent Philadelphia Electric Company audit found the steps to be effective.

ATTACHMENT II

RESPONSE TO APPENDIX B

1. Description

Construction Office Field Memoranda and Bechtel Field Communication Control action items are not tracked for completion.

Resolution

A revised system for tracking Philadelphia Electric Construction Office Field Memoranda (CFOM) was instituted. These changes are as follows:

1. Each CFOM will indicate whether a reply is required or not.
2. The CFOM log will have three additional columns to be filled out.
 - a) Response required (Yes/No)
 - b) Answered by (BLP, LTC, etc.)
 - c) Action Complete (Yes)

This revised system was initiated prior to the completion of this NRC inspection.

In January, Bechtel Power Corporation initiated the tracking of items requiring action related to Q-Listed items (nuclear safety related).

The tracking is accomplished by expanding the use of the Automated Communications Register and the Open Action Report to cover not only items that require replies but also items which require action.

2. Description

Philadelphia Electric Company procedures for processing open audit findings need more explicit guidance to improve closure timeliness.

Resolution

A completely revised system of administering the follow up and tracking of open Philadelphia Electric Company Quality Assurance Field initiated findings has been implemented. Each finding is now tracked and followed up on its own due date on an individual basis. Previous follow up measures were performed on a periodic basis. This new system will provide for each finding receiving individual attention.

This system is already in effect. Also, the individuals involved in this effort have been trained in the new system.

COMMONWEALTH OF PENNSYLVANIA :
COUNTY OF PHILADELPHIA : SS.

JOHN S. KEMPER, being first duly sworn, deposes and says:

That he is Vice President of Philadelphia Electric Company,
the holder of Construction Permit CPPR-106 for Limerick Generating Station
Unit 1; that he has read the foregoing Response to Inspection Report No.
50-352/82-16 and knows the contents thereof; and that the statements
and matters set forth therein are true and correct to the best of his
knowledge, information and belief.

John S. Kemper

Subscribed and sworn to
before me this 11th day
of March 1983

Patricia D. Scholl

Notary Public

PATRICIA D. SCHOLL
Notary Public, Philadelphia, Philadelphia Co.
My Commission Expires February 10, 1985