


PECO ENERGY

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November 21, 1994

Docket Nos. 50-352

50-353

License Nos. NPF-39

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

Subject: Limerick Generating Station, Units 1 and 2
Request for Approval to Change the Quality Assurance
Program Description

Reference: Letter from G. A. Hunger, Jr. (PECO Energy) to USNRC
dated November 21, 1994

Gentlemen:

This letter is submitted in accordance with 10 CFR 50.54(a)(3), which requires prior NRC approval for any change which reduces the commitments in a previously accepted Quality Assurance Program Description (QAPD). PECO Energy Company (PECO Energy) is proposing to eliminate the Independent Safety Engineering Group (ISEG) composition commitment while retaining the independent technical review function and relaxing certain Nuclear Quality Assurance assessment (audit) frequencies.

All proposed changes to the QAPD and their affected pages are provided in Attachment 1.

ISEG CHANGESISEG Composition Description

NUREG-0737 "Clarification of TMI Action Plan Requirements," included a requirement, which applied to all applicants for an operating license, to establish an on-site independent safety engineering group to perform independent reviews of plant operations. A summary of the NUREG-0737 requirements is as follows:

The ISEG shall consist of five dedicated, full-time engineers, located on-site, but reporting to a corporate official who holds a high-level, technically oriented position that is not in the management chain for power production. The ISEG will provide a continuing, systematic, and independent technical assessment of plant activities.

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NUREG-0737 also indicates that the principal function of the ISEG is to examine sources of plant design and operating experience information that may indicate areas for improving plant safety. The ISEG is to perform independent review and audits of plant activities including maintenance, modifications, operational problems, and operational analysis. Where useful improvements can be achieved, it was expected that the ISEG issue detailed recommendations to corporate management in areas such as revised procedures and equipment modifications. Another function of the ISEG is to maintain surveillance of plant operations and maintenance activities to provide independent verification that these activities are performed correctly and human errors are reduced as far as practicable.

LGS's ISEG was established in response to the NUREG-0737. The requirements of NUREG-0737 were incorporated into the LGS Technical Specifications (TS), Section 6.2.3 and the LGS Quality Assurance Program Description (QAPD) contained in the Updated Final Safety Analysis Report (UFSAR) Chapter 17 and in the UFSAR, Chapter 13, as part of Limerick's original operating license. The LGS ISEG currently reports to the Director-NQA. The LGS ISEG provides the review functions stated above.

The composition of the LGS ISEG, as currently described in UFSAR Section 13.4.5, requires that the ISEG organization be composed of at least five dedicated, full-time engineers, including the ISEG Manager.

The current sections of the QAPD were evaluated in accordance with 10 CFR 50.54(a)(3) and the affected pages are contained in Attachment 1.

Proposed Change to ISEG

PECO Energy is proposing to eliminate the ISEG composition requirement while maintaining the independent technical review function by establishing an Independent Technical Review Program. Individuals performing independent technical review pursuant to the program will still ultimately report to the Director - NQA; however, they will directly report to the Limerick (LGS) Quality Division Manager (QDM) in lieu of a dedicated ISEG manager. Reviews will be performed by several personnel who are independent of the plant management chain. Detailed recommendations will be made directly to senior management of the affected organization with copies of the recommendations provided to the Senior Vice President and Chief Nuclear Officer and the Director - Nuclear Quality Assurance (NQA), in lieu of making the recommendations directly to the Senior Vice President and Chief Nuclear Officer. Finally, the qualification for individuals performing the independent technical review function can be either degreed engineers as stipulated in NUREG-0737, "Clarification of TMI Action Plan Requirements," or non-degreed individuals with at least eight (8) years of related experience.

Reason for ISEG Change

The staffing levels for an ISEG are specified in NUREG-0737. The staffing requirements for five dedicated engineers is burdensome to PECO Energy as it restricts the capability to utilize resources to their maximum advantage and does not result in an increase in the protection afforded to the health and safety of the public. The current staffing requirement provides little flexibility for the performance of ISEG required reviews and audits.

The proposed change would provide increased flexibility to accomplish the ISEG review function. The elimination of the composition requirement for the ISEG while retaining the requirement to perform independent technical reviews will result in increased QA Program efficiency and maintains effectiveness. The ISEG and Quality Assessment Section currently perform their oversight assessment functions independently from one another. The proposed change would integrate the independent review function into the overall station audit and review function under the direction of the LGS site Quality Division Manager resulting in better utilization and coordination of these resources. Oversight effectiveness would be enhanced by allowing greater flexibility in focusing resources on areas deemed by the Quality Division Manager as affording greater opportunities for improvement.

Program Continues to Satisfy Criteria

This change as described will continue to satisfy both the 10 CFR 50, Appendix B, requirements and the purpose of NUREG-0737 when the UFSAR is revised to reflect this upgrade. The purpose, scope, and thoroughness of independent technical reviews will not be affected. Management oversight of the independent technical review function will not be diminished.

The proposed change will eliminate the composition requirement for ISEG as currently described in UFSAR Section 13.4.5 which is referenced by the QAPD; therefore, this change constitutes a reduction in commitment to the QAPD requiring NRC approval prior to implementation. However, this reduction in commitment does not reduce the PECO Energy commitment to quality, or compliance with 10 CFR 50, Appendix B based on the following.

1. The QAPD (UFSAR Section 17.2.2.16) states that the ISEG Manager is responsible for ensuring that the ISEG review and audit activities are performed. The ISEG Manager does not perform the review activities; rather, the ISEG Manager supervises and coordinates the actions of the four ISEG engineers to ensure that the UFSAR required ISEG functions are satisfied.

Transferring the responsibility for the independent technical review function to the Quality Division Manager (QDM) will have no adverse impact on the independent technical review function. The QDM position is at a higher management level than the ISEG manager position and is directly responsible for the adequacy of site oversight. The QDM is already required to satisfy the minimum professional level experience requirements stipulated in ANSI/ANS 3.1-1978 which is equivalent to the NUREG-0737 requirements. Moreover, the NRC has approved a license change to Three Mile Island (TMI) for a three person ISEG to report to the site QA Manager. Thus, precedence exists for replacement of the ISEG Manager with the LGS QDM to satisfy the intent of NUREG-0737 with respect to supervision of personnel performing the independent technical review function.

2. The proposed change is consistent with the recommendations contained in the NRC's Regulatory Review Group Report (Final Report, August 1993) which included an examination of Seabrook Unit 1 TS 6.2.3, "Independent Safety Engineering Group (ISEG)." The Regulatory Review Group chose this item for review because it is very prescriptive with regard to manpower requirements. The Regulatory Review Group assessment noted that in NUREG-1433, (Standard Technical Specifications (STS) for General Electric Plants, BWR/4, dated 9/28/92), the ISEG has been replaced with an independent review function which provides a relaxation of the five-person staffing requirement and permits more flexible methods of performing the reviews. Specifically, the Standard Technical Specifications call for the elimination of the composition requirement for a 5-person ISEG. In its place, the STS call for the ISEG function to be

performed under the review and audit program. This proposed change is consistent with NUREG-1433.

PECO Energy, per the referenced letter, is requesting a Technical Specifications (TS) change affecting the ISEG section of TS, consistent with NUREG-1433.

3. The current LGS UFSAR staffing requirement for ISEG is 5 dedicated full time engineers, one of which is the ISEG Manager. As indicated above, the ISEG Manager provides primarily a supervisory function for the four remaining ISEG engineers. The proposed change requests that the independent technical review function be performed by several (i.e., three or more) individuals reporting to the site Quality Division Manager. This provides additional flexibility, and better utilization of resources while still accomplishing the NUREG-0737 commitment to perform independent technical reviews.

Separate improvements within the organization have taken place since the original license established ISEG which has resulted in less need for a dedicated five person group to accomplish the independent technical review function of NUREG-0737. These improvements have provided sufficient benefit enabling PECO Energy to reduce the ISEG commitment. For example; the Operating Experience Review function (which includes NRC and INPO issuances) originally assigned to ISEG was transferred to line organizations, reducing the ISEG workload in this area. The Experience Assessment Group trends events and event causes via the Performance Enhancement Program, described in procedure LR-C-10. This relieves ISEG of this task. ISEG now independently analyzes and uses data from the Performance Enhancement Program. With regard to analyzing unit performance, improved plant computers (e.g., PIMS, Process Computers, etc.) and the development of station performance indicators have reduced the ISEG effort needed to perform this function. Moreover, station self-assessment practices have improved significantly. This results in less ISEG effort to independently assess operational and maintenance issues. Furthermore, since the implementation of NUREG-0737 requirements, INPO has established and implemented a fully developed function of analyzing and highlighting industry events. This serves to reduce the ISEG effort in this area. Both NQA and ISEG include observations of line performance in this area from time-to-time.

Therefore, due to the improvements as discussed above, the functions of the ISEG originally performed by 4 dedicated engineers and a supervisor can now be performed by several personnel who are not dedicated to this function. Individuals performing the independent technical review function will still remain independent of the power production management chain and will satisfy the minimum experience requirements of NUREG-0737 for degreed personnel.

This change also proposes to allow the independent technical review function to be performed by non-degreed individuals with at least 8 years of related experience. This change will allow PECO Energy to utilize valuable experienced personnel to perform the independent review function. Performance of the independent technical review function by non-degreed individuals has been approved by the NRC for Diablo Canyon, Clinton and Beaver Valley.

4. Lastly, NUREG-0737 states that ISEG will present detailed recommendations to corporate management. The LGS TS stated that recommendations shall be submitted through the General Manager-NQA to the Executive-Vice President-Nuclear. Currently, the LGS UFSAR Section 13.4.5, states that ISEG recommendations are submitted directly to the affected organizations, with copies to the Director-NQA and the Senior Vice President-Nuclear. Although the titles are different, the cited individuals are

functionally equivalent. Titles are being revised to reflect the current organization and are being addressed by the referenced TS Change Request letter.

Moreover, the method for handling ISEG recommendations as currently stated in the UFSAR is functionally equivalent to the current TS and satisfies the intent that senior management, not directly responsible for power production, is aware of ISEG recommendations and that ISEG recommendations receive adequate senior management sponsorship. Therefore, this change is acceptable.

This proposed change is modeled against and similar to changes made to the Diablo Canyon Technical Specifications pursuant to NRC issued Amendment Nos. 91 and 90 to Facility Operating License Nos. DPR-80 and DPR-82 for the Diablo Canyon Nuclear Power Plant Unit 1 and 2, respectively, dated March 7, 1994.

AUDIT CHANGES

Audit Description

The LGS UFSAR Section 17.2 states that the Nuclear Quality Assurance Program complies with the requirements of 10 CFR 50, Appendix B and is based on the QA-related NRC Regulatory Guides (RGs) and associated standards. Furthermore, the UFSAR states that compliance to these RGs and standards is addressed in UFSAR Appendix 17.2.II.

UFSAR Chapter 17 and Appendix 17.2.II, item c., addresses PECO's commitment to RG 1.33, Rev. 2, as it applies to audit (assessment) frequencies.

Beyond the activities assessed on an annual basis as described in UFSAR Chapter 17, NQA also conducts annual assessments as described in UFSAR Section 13.4.4. These include assessments for the results of actions taken to correct deficiencies occurring in unit equipment, structures, systems, or method of operation that affect nuclear safety at least once every six months; and the conformance of unit operation to provisions contained within the Technical Specifications and applicable License Conditions at least once every twelve months.

The current sections of the QAPD were evaluated in accordance with 10 CFR 50.54(a)(3) and the affected pages are contained in Attachment 1.

Proposed Change to Audits

PECO Energy requests approval of the assessment frequency changes as proposed in the following areas.

The assessment frequency of the conformance of unit operation to provisions contained within the TS and applicable License Conditions is proposed to change from at least once every twelve (12) months to at least once every twenty-four (24) months.

The assessment frequency of the performance, training, and qualifications of the operating staff is proposed to change from at least once every twelve (12) months to at least once every twenty-four (24) months.

The assessment frequency of the results of actions taken to correct deficiencies occurring in unit equipment, structures, systems, or method of operation that affect nuclear safety is proposed to change from at least once every six (6) months to at least once every twenty-four (24) months.

The assessment frequency of the radiological environmental monitoring program and the results thereof is proposed to change from at least once every twelve (12) months to at least once every twenty-four (24) months.

The assessment frequency of the performance of activities required by the Quality Assurance Program to meet the criteria of Regulatory Guide 4.15, December, 1977, is proposed to change from at least once every twelve (12) months to at least once every twenty-four (24) months.

The Emergency Plan and implementing procedures, Security Plan and implementing procedures, and the independent fire protection and loss prevention assessments also carry annual assessment frequencies per regulations and commitments. These areas are not proposed to change and will continue to be assessed on their current frequencies.

In addition to the physical changes made to the audit frequencies, PECO Energy proposes to eliminate a portions of UFSAR Section 17.2.18.6 which contains a repetitious listing of assessment activities also located in UFSAR Section 13.4.4. Having one section contain this information would be easier to maintain. Furthermore, UFSAR Section 13.4.4 provides a more detailed listing of assessment areas and the appropriate Standard Review Plans (13.4, 17.1, and 17.2) confirm that Section 13.4 should contain the subject matter to be assessed.

Reason for Audit Change

The change in frequency for the above assessment activities to biennial will result in an increase in QA Program effectiveness. Currently the subject assessment areas are regimentally scheduled for assessment on the basis of annual frequency commitments without due consideration of the need for the assessment in view of performance as indicated by empirical data, events, and trends. Without this consideration this can result in inappropriate allocation of assessment resources when other areas are in need of an audit as indicated by performance data.

Assessment activities, to be effective, should be performed with a frequency commensurate with their safety significance, and with due consideration of performance data. The change in frequency for the above assessment activities will allow PECO Energy's, NQA Management to make assessment scheduling decisions and allocate resources based on performance data relating to each assessment activity, within the twenty-four month period. These dynamic schedules can be further substantiated by the fact that on-going surveillance are performed during the interval between assessments, which are conducted to provide for progressive assessments of functional performance.

Program Continues to Satisfy Criteria

The proposed changes to assessment frequencies will continue to satisfy 10 CFR 50, Appendix B, and will be adequately described in the UFSAR. The purpose, scope, and thoroughness of Quality Assurance assessments will not be affected and PECO Energy Management oversight of the assessment process will not diminish.

Changing the assessment frequency to be performed at least once every twenty-four (24) months does constitute a reduction in commitment relative to audit frequencies as currently described in Chapter 17 of the UFSAR. However, this reduction in commitment does not reduce the PECO commitment to quality, nor compliance to 10 CFR 50, Appendix B on the following basis.

1. The bases for annual assessment frequencies are stated as recommendations in RG 1.33.
2. Assessment areas will not be reduced and will be scheduled according to their safety significance and empirical performance data such as trends, events, and surveillance results.
3. The allocation of assessment resources will be based upon performance data and thereby provide for timely assessment coverage of areas which warrant oversight attention.
4. Assessment resources will not be diluted by unnecessary calendar driven oversight of audit areas which are performing at a high and steady rate.
5. On-going surveillances are conducted during the two-year assessment interval which provide for progressive assessments of functional performance.
6. Training assessments are supplemented by INPO established Accreditation Board self-evaluations and renewal of accreditation which ensures satisfactory training for the plant staff and provides professional oversight of the training process.

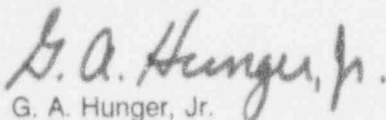
CONCLUSION

Since the proposed changes would eliminate the composition requirement for ISEG and change audit frequencies, these changes are considered a reduction to the commitments as described in the Quality Assurance Program. However, the effectiveness of satisfying 10 CFR 50, Appendix B, requirements and meeting the NUREG-0737 commitment to provide an on-site independent technical review function and the RG 1.33 commitment to perform audits will not be reduced as a result of the changes.

Subsequent to NRC approval the ISEG and audit changes will be reflected in the LGS UFSAR and are currently being tracked by PECO Energy's Engineering Change Request (ECR) process, and identified as ECR L94-10805 and ECR L94-10882 respectively.

Because approval of these QAPD changes would improve resource allocation, we request the NRC's prompt attention to approve these changes by January 3, 1995. If you have any questions please do not hesitate to call us.

Very truly yours,



G. A. Hunger, Jr.
Director - Licensing

KFB/clw

Attachment

cc: T. T. Martin, Administrator, Region I, USNRC (w/attachment)
N. S. Perry, USNRC Senior Resident Inspector, LGS (w/attachment)
R. R. Janati, Commonwealth of Pennsylvania (w/attachment)
M. C. Modes, Chief, Materials Section, Region I, USNRC (w/attachment)