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VICE PRESIDENT
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March 8, 1984

Docket Nos. 50-278
50-278

Inspection Report Nos. 50-277/83-32
50-278/83-30

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

Dear Mr. Martin:

Your letter of February 9, 1984, forwarded combined Inspection Report 50-277/83-32 and 50-278/83-30. Appendix A addresses one item which appears to be a deviation from the actions described in an October 19, 1981 letter from S. L. Daltroff, Philadelphia Electric Company, to T. T. Martin, NRC. This item is restated below along with our response.

A letter from S. L. Daltroff, Philadelphia Electric Company, to T. T. Martin, NRC, subject: Response to Notice of Violation, dated October 19, 1981, committed to full compliance with ANSI N45.2.9-1974, Requirements of Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants, by June 1983. The standard requires permanent and temporary record storage be provided for maintenance, preservation, and the safety of required records. Procedure A 46.1, Transmittal of Records to the Nuclear Records Management System, Revision 0, permits the various departments generating records to retain such records for periods up to four years.

Contrary to the above, adequate preservation and protection was not provided certain permanent records in that; maintenance records were stored in several cardboard boxes placed at various locations (e.g. under desks, along aisles) about the Maintenance Office floor; and, radiation work permits and other Health Physics loose records were stored in stacks atop various desks in the Health Physics Office. A sampling of these records indicated they had been retained in this fashion between sixty days and one year.

Response

A substantial backlog of Maintenance Request Forms (MRFs) were stored in several cardboard boxes at various locations about the Maintenance Engineering office floor and had accumulated as a result of a Nuclear Plant Reliability Data System (NPRDS) review effort.

Philadelphia Electric Company is involved in NPRDS which is under the management of the Institute of Nuclear Power Operations (INPO). The majority of the component failure information submitted to INPO for NPRDS is identified through the station maintenance activities which are controlled by means of MRF's. MRF's are reviewed for NPRDS reportability prior to their transfer to the Document Administration Center (DAC) for inclusion in the Nuclear Records Management System (NRMS).

All backlog MRF's identified during the inspection have been sent to the DAC for processing and inclusion into NRMS. Likewise, Peach Bottom has instituted a Computerized History and Maintenance Planning System (CHAMPS) which incorporates the information contained on MRF's into a computer system. ~~Failure~~ *Future* reporting to NPRDS will thereby be accomplished by reviewing the information contained in CHAMPS thus allowing the hard copies of the MRF's to be transferred to the DAC in a more timely fashion.

Radiation Work Permits (RWPs) were stored in stacks atop various desks in the Health Physics Office and had accumulated as a result of Philadelphia Electric Company's ALARA program.

In an effort to provide a better ALARA program, completed RWPs are reviewed and important exposure information is recorded before the records are transferred to the DAC. This data provides an exposure history that will enable health physics personnel to more accurately keep exposures as low as reasonably achievable.

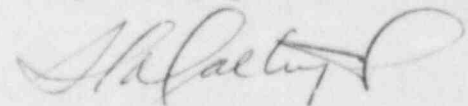
The accumulation of RWPs occurred because manpower efforts were placed in areas given higher priorities. The problem with the accumulation of records was recognized and corrective actions were being implemented prior to the NRC inspection of the area. A technician was assigned the task of reviewing these records to reduce the backlog. The required information has since been recorded and the records identified in the inspection are now in the DAC.

Additional clerical staff will be used during the upcoming Unit 2 refuel/maintenance outage to handle an anticipated large quantity of RWPs. This should prevent any future large accumulation of RWPs awaiting ALARA review.

Additionally, a letter has been sent to all Senior Staff responsible for the work groups listed in Administrative Procedure Exhibit A-46.1-1, "PBAPS Document Responsibilities by Work Group". The letter requests that the procedure be reviewed and that any large accumulation of records listed in this procedure be transferred to the DAC. The work groups are requested to provide the DAC with a steady flow of records to prevent any future large accumulation of records. Exhibit A-46.1-1 is being revised to emphasize this request for future reference. We believe this meets the intent of ANSI N45.2.9-1974 in that only active records will not be in the process of transfer to the DAC.

If you have any further questions, please do not hesitate to contact us.

Very truly yours,



cc: Mr. A. R. Blough, Site Inspector