

PHILADELPHIA ELECTRIC COMPANY

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April 23, 1984

Docket Nos. 50-277
50-278

Mr. Darrell G. Eisenhut
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

- REFERENCES:
- (1) Generic Letter 83-28, "Required Actions Based on Generic Implications of Salem ATWS Events", July 8, 1983
 - (2) Letter, J. F. Stolz, USNRC, to E. G. Bauer, Jr., PECO, "Clarification of Required Actions Based on Generic Implications of Salem ATWS Events", October 21, 1983
 - (3) Letter, S. L. Daltroff, PECO, to D. G. Eisenhut, USNRC, Response to Generic Letter 83-28, November 4, 1983

Dear Mr. Eisenhut

This letter is a follow-up to the Reference 3 letter describing the current status of Philadelphia Electric Company's program to address the positions contained in Generic Letter 83-28, "Required Actions Based on Generic Implications of Salem ATWS Events", July 8, 1983.

Philadelphia Electric Company has been participating in industry-wide generic efforts conducted by the BWR Owners' Group and INPO to address certain positions in Generic Letter 83-28. Additionally, where these generic efforts have not been applicable to Philadelphia Electric Company, we have taken actions that we believe conform to the positions in Generic Letter 83-28 applicable to Peach Bottom Atomic Power Station Units 2 and 3.

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Those positions in Generic Letter 83-28, to which we committed to respond in the Reference 3 letter, are restated below along with our response.

ITEM 2.1EQUIPMENT CLASSIFICATION AND VENDOR
INTERFACE (REACTOR TRIP SYSTEM COMPONENTS)Position

Licensees and applicants shall confirm that all components whose functioning is required to trip the reactor are identified as safety-related on documents, procedures, and information handling systems used in the plant to control safety-related activities, including maintenance, work orders, and parts replacement. In addition, for these components, licensees and applicants shall establish, implement and maintain a continuing program to ensure that vendor information is complete, current and controlled throughout the life of the plant, and appropriately referenced or incorporated in plant instructions and procedures. Vendors of these components should be contacted and an interface established. Where vendors cannot be identified, have gone out-of-business, or will not supply the information, the licensee or applicant shall assure that sufficient attention is paid to equipment maintenance, replacement, and repair, to compensate for lack of vendor backup, to assure reactor trip system reliability. The vendor interface program shall include periodic communication with vendors to assure that all applicable information has been received. The program should use a system of positive feedback with vendors for mailings containing technical information. This could be accomplished by licensee acknowledgement for receipt of technical mailings. The program shall also define the interface and division of responsibilities among the licensees and the nuclear and non-nuclear divisions of their vendors that provide service on reactor trip system components to assure that requisite control of, and applicable instructions for maintenance work, are provided.

Response

All systems that contribute to the reactor trip function have been identified as being in the current 'Q' list. Consequently, all components on the identified systems, unless specifically excluded, are subject to the quality assurance program. Philadelphia Electric Company is continuing to evaluate the current Peach Bottom 'Q' list to determine what improvements can be made to enhance its use.

In accordance with approved Peach Bottom Administrative procedures and Engineering and Research Departmental procedures regarding procurement, each item or service to be procured must be reviewed to determine whether or not it is safety related. This review is performed by a cognizant member of the Plant Staff or the Engineering and Research Department as applicable. The determination is guided as appropriate by the applicable codes and standards, the Engineer-Contractor, and the NSS Supplier. We believe the current Peach Bottom 'Q' list and the existing procedural controls governing its use are adequate to meet the intent of Generic Letter 83-28.

A cost/benefit analysis is being performed to evaluate whether 'Q' list, expanded to include components within 'Q' listed systems, will enhance its usefulness by eliminating these analyses mentioned above to determine if a component within a 'Q'-listed system is safety related.

Certain components and sub-components contained within a system listed as safety related, may not be safety related in themselves. Under the current 'Q' list, if the entire system is listed as safety related, the component in question must be analyzed to determine if it is safety related.

Regarding Vendor Interface, Philadelphia Electric Company is continuing its participation in the BWR Owners' Group Evaluation to update those manuals associated with the reactor protection systems. contributing to the reactor trip function.

In conjunction with this effort, Philadelphia Electric Company has taken the following actions to improve our confidence that vendor information is included in plant instructions and procedures.

A tabulation of all vendor manuals for both safety and non-safety related equipment has been completed and all manuals that are required have been identified. A controlled master

file for these manuals will be created at Peach Bottom under control of the Systems Support Division.

The Independent Safety Engineering Group (ISEG) is preparing procedures for the independent review of information supplied by the NSS Supplier for the on-going vendor interface program to assure that vendor manuals are maintained current for the life of the plant and that plant procedures are in accordance with vendor recommendations. For reactor trip function components, this procedure will be utilized to address the following types of General Electric Company technical reporting:

- Service Information Letters (SIL)
- Customer (Urgent) Communications
- 10 CFR 21 Reporting
- Service Advice Letters (SAL)
- Application Information Documents (AID)

The ISEG is reviewing these types of documents for their applicability to Peach Bottom, and the associated administrative controls are expected to be proceduralized by June 1, 1984.

As a further improvement in our control of vendor manuals, the Engineering and Research Department is now treating vendor manuals as drawings. By doing this, the vendor manual becomes part of the drawing file and is subject to the Engineering and Research Departmental Procedures (ERDP) regarding drawing control and requires updating of the manuals just as drawings are updated following modification work. A new ERDP, specifically addressing control of the vendor manuals in this manner, has been prepared and is in the approval process. It is expected that this procedure will be in effect by September 1, 1984. Currently, any vendor manual that is known to have changes, as a result of an in-progress plant modification, is being amended.

ITEM 2.2

EQUIPMENT CLASSIFICATION AND VENDOR
INTERFACE (PROGRAMS FOR ALL SAFETY-RELATED)
COMPONENTS

Position

2. For vendor interface, licensees and applicants shall establish, implement and maintain a continuing program to ensure that vendor information for safety-related components is

complete, current and controlled throughout the life of their plants, and appropriately referenced or incorporated in plant instructions and procedures. Vendors of safety-related equipment should be contacted and an interface established. Where vendors cannot be identified, have gone out-of-business, or will not supply information, the licensee or applicant shall assure that sufficient attention is paid to equipment maintenance, replacement, and repair, to compensate for the lack of vendor backup, to assure reliability commensurate with its safety function (GDC01). The program shall be closely coupled with action 2.2.1 above (equipment qualification). The program shall include periodic communication with vendors to assure that all applicable information has been received. The program should use a system of positive feedback with vendors for mailings containing technical information. This could be accomplished by licensee acknowledgment for receipt of technical mailings. It shall also define the interface and division of responsibilities among the licensee and the nuclear and non-nuclear divisions of their vendors that provide service on safety-related equipment to assure that requisite control of applicable instructions for maintenance work on safety-related equipment are provided.

Response

Philadelphia Electric Company participated in the Nuclear Utility Task Action Committee (NUTAC) on Generic Letter 83-28, Section 2.2.2, along with 56 other utilities. The report issued by the NUTAC, titled, 'Vendor Equipment Technical Information Program, February, 1984,' is attached for your reference. It describes a Vendor Equipment Technical Information Program (VETIP) that responds to the concerns on vendor information and interface addressed in Section 2.2.2 of the generic letter. The VETIP is an industry-controlled program that does not rely on vendor action, other than the NSS Supplier, to provide information to utilities.

We conclude that this approach will be more effective than the vendor-oriented program suggested in the generic letter for reasons discussed on pages 5 and 6 of the NUTAC report.

In response to Section 2.2.2 of Generic Letter 83-28, we will assure conformance with the various elements of the Vendor Equipment Technical Information Program using the guidance provided in the NUTAC report. The specific programs involving utility implementation responsibilities are described in Section 4.1.1 of the NUTAC report and summarized below. Generally, we currently comply with most aspects of the program; however, the administrative controls need to be strengthened in several areas. Development of the administrative procedures to ensure implementation of the programs described in Section 4.1.1 will be completed by March 1985. These programs are summarized as follows:

1. NSS Vendor Contact: This program consists of a technical bulletin system and necessary contact with the NSS Supplier. Administrative controls will be established to ensure an assessment of the technical information by qualified personnel, and that the appropriate actions are taken as deemed necessary by the assessment.
2. NPRDS: The current level of participation in Nuclear Plant Reliability Data System will be expanded to meet the intent of the INPO recommendations.
3. Other Vendors: We will continue to seek assistance and equipment technical information from other safety-related equipment vendors when our evaluation of an equipment problem concludes that such direct interaction is necessary or would be beneficial.
4. Handling of Equipment Technical Information: Administrative procedures will provide control of incoming equipment technical information that is received from a vendor or from other industry or regulatory sources. This includes, but not limited to, information received from vendors (drawings, instruction manuals, etc.), INPO (NPRDS, SOER's), NRC (Bulletins, Information Notices, and NUCLEAR NETWORK). Administrative procedures will be established to ensure it receives the appropriate technical review, evaluation, distribution, and control for future reference. Appropriate actions will be taken as deemed necessary by the evaluation. Technical information will be incorporated into the maintenance or operating procedures, purchasing records, and training program as appropriate.

5. Internal Handling of Vendor Services: The vendor, contractor or technical representative who will perform safety-related services will be an approved/qualified supplier, and will perform the service in accordance with Philadelphia Electric Company's QA program.

ITEM 3.1

POST-MAINTENANCE TESTING (REACTOR TRIP
SYSTEM COMPONENTS)

2. Licensees and applicants shall submit the results of their check of vendor and engineering recommendations to ensure that any appropriate test guidance is included in the test and maintenance procedures or the Technical Specifications, where required.

Response

In the Reference 3 letter, we stated that this position would be addressed following completion of the BWR Generic Owners' Group effort. This effort has not yet been completed regarding the updating of vendor manuals.

Our review of plant testing and maintenance procedures applicable to the reactor protection system (RPS) indicates that maintenance procedures are more greatly impacted by vendor information than are those procedures relative to plant testing.

Surveillance test (S.T.) and routine test (R.T.) procedures are performed to verify acceptable system performance based on its original design. The satisfactory performance of an S.T. or R.T. procedure constitutes a review of the procedures. An S.T. or R.T. which fails to be satisfactorily completed because of a procedural problem is revised and submitted to the Plant Operation Review Committee for review and approval. Additionally, the ISEG review of those NSS Supplier documents referred to in response to Item 2.1 supports the S.T. and R.T. program applicable to the RPS to ensure that these procedures reflect the latest vendor information. We believe, based on this discussion, that the procedures for testing of the RPS reflect appropriate vendor guidance for proper performance of these procedures.

The Electric Production Department Maintenance Division is currently in the process of obtaining the services of a consultant to update all Peach Bottom maintenance procedures. Approximately 320 procedures will be updated, and it is

expected that such work will begin in May 1984 and require 3 years to complete the task. Following completion of the Owners' Group effort, if completed in a reasonable time frame, we will provide the necessary updated information to the consultant to be included in the review in updating RPS maintenance procedures. Since at this time we do not know the time frame for completion of the Owners' Group effort, we are evaluating plans to direct the consultant performing the review applicable to contact the vendor as each procedure is reviewed. We will provide to the Commission a schedule for completing the update of RPS maintenance procedures by July 1, 1984.

ITEM 3.2

POST-MAINTENANCE TESTING
(ALL OTHER SAFETY-RELATED COMPONENTS)

2. Licensees and applicants shall submit the results of their check of vendor and engineering recommendations to ensure that any appropriate test guidance is included in the test and maintenance procedures or the Technical Specifications where required.

Response

In accordance with the discussion in response to item 3.1 regarding plant testing, Philadelphia Electric Company will concentrate efforts towards the updating of safety-related maintenance procedures to ensure that these procedures reflect the latest vendor information. Concurrent with the updating program as described, we are evaluating plans to have the consultant contact the appropriate vendors and to include any changes in vendors recommendations in the revised procedures. We will provide to the Commission by July 1, 1984, our specific plans to carry-out this review. However, as the procedures are updated, participation in those industry programs, as described in the NUTAC report, will maintain both the vendor manuals and maintenance procedures current.

We trust that this information contained in the above responses is sufficient for Nuclear Regulatory Commission review of Philadelphia Electric Company's current conformance with the positions stated in Generic Letter 83-28. We have provided, to the best of our knowledge, our current status regarding the NRC positions and in Generic Letter 83-28. Schedules and our plans to achieve conformance with these positions have been proposed.

Mr. Darrell G. Eisenhut

April 23, 1984

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Should you require any further information, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in cursive script, appearing to read "A. R. Blough".

cc: A. R. Blough, Site Inspector

COMMONWEALTH OF PENNSYLVANIA :

: SS.

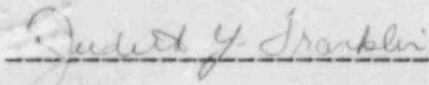
COUNTY OF PHILADELPHIA :

S. L. Daltroff, being first duly sworn, deposes and says:

That he is Vice President of Philadelphia Electric Company;
that he has read the foregoing response to Generic Letter 83-28 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.



Subscribed and sworn to
before me this 24TH day
of APRIL, 1984


Notary Public

JUDITH Y. FRANKLIN
Notary Public, Phila., Phila. Co.
My Commission Expires July 28, 1987