



PECO ENERGY

Station Support Department

10 CFR 50.54(a)(3)(i)

10 CFR 50.90

PECO Energy Company
Nuclear Group Headquarters
965 Chesterbrook Boulevard
Wayne, PA 19087-5691

April 10, 1995

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
Response to Request for Additional Information Regarding
Technical Specifications Change Requests 94-11, 94-12, and 94-13
and Proposed Change to Quality Assurance Program Description

Dear Sir:

Attached is our response to your Request for Additional Information (RAI) dated February 23, 1995 regarding our request to relocate certain review and audit requirements to the Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, Updated Final Safety Analysis Report (UFSAR). Attachment 1 to this letter provides a restatement of the RAI followed by our response.

As indicated in our response, the review and audit requirements will be relocated to the Quality Assurance Program Description (QAPD), which is controlled by 10CFR50.54(a)(3); accordingly, we are also proposing a change to the frequency for performing certain audit requirements which would now constitute a change which reduces the commitments in a previously accepted QAPD and requires prior NRC approval in accordance with 10 CFR 50.54(a)(3).

A change in frequency is proposed for audits of plant activities in the following areas:

1. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions from once every 12 months to once every 24 months. In accordance with 10 CFR 50.54(p), an audit of the security plan and implementing procedures will continue to be performed at least once every 12 months. In accordance with 10 CFR 50.54(t), the emergency plan and implementing procedures will continue to be audited at least once every 12 months.
2. The performance, training and qualifications of the entire facility staff from once every 12 months to once every 24 months.
3. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety from once every six months to once every 24 months.
4. The performance of activities required by the Quality Assurance Program regarding the radiological monitoring program to meet the provisions of Regulatory Guide 4.1, Revision 1, April 1975, from once every 12 months to once every 24 months.

9504180299 950410
PDR ADDCK 05000277
P PDR

4001 Add: NRR/DOTS/TQMB Lr Encl

Currently, audits are regimentally scheduled on the basis of annual and six month frequency requirements without due consideration of the need for audit in view of performance as indicated by empirical data, events, and trends. This can result in inappropriate allocation of assessment resources when other areas are in need of an audit as indicated by performance data. Audits, to be effective, must be performed on a frequency commensurate with their safety significance and with due consideration of performance data. The change in frequency for audits to biennial will enable management to make audit scheduling decisions and allocate assessment resources based on performance data relating to each audit activity. This mode of operation is further substantiated by the fact that during the interval between audits, surveillances are conducted to provide for progressive assessment of functional performance.

ANSI N18.7-1972 states, "Audits of selected aspects of plant operation shall be performed with a frequency commensurate with their safety significance and in such a manner as to assure that an audit of safety-related activities is completed within a period of two years." PBAPS is committed to this standard which supports the proposed change in frequency for activities 1, 2, and 3 identified above.

A review of Regulatory Guide 4.1, Revision 1, April 1975; Regulatory Guide 1.33, November 1972; ANSI N18.7-1972, and other documents (e.g., PBAPS Safety Evaluation Report, Regulatory Guide 4.8, etc.) could not identify a specific frequency for activity 4 identified above. Audits on a biennial frequency would align this activity (UFSAR Section 17.2.18.1.j) with all activities not otherwise specified at a shorter interval by the Code of Federal Regulations (UFSAR Sections 17.2.18.1.e and f). Overall, the Nuclear Quality Assurance Master Audit Plan (MAP) encompasses 50 audit areas.

In summary, changing the audit frequency for the four activities identified above does constitute a reduction in commitment relative to the frequencies described in the QAPD; however, the change in frequency does not reduce the PECO Energy commitment to quality, compliance with 10 CFR 50 Appendix B, or the effectiveness of the assessment program on the basis of the following:

1. Requirements for six month and 12 month frequencies for the noted audit areas are not contained in the Regulatory Guides and Industry Standards identified in UFSAR Appendix 17.2.A.
2. Audit areas will be scheduled according to their safety significance and empirical performance data such as trends, events, and surveillance results.
3. Allocation of assessment resources will be based on 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. Surveillances are conducted during the two-year audit frequency interval which provide for progressive assessment of functional performance.

The proposed changes in the QAPD related to audit frequencies are provided in Attachment 2.

Changes to the QAPD were previously proposed with respect to the Independent Safety Engineering Group (ISEG) in our letter dated November 14, 1994. To clarify that 10 CFR 50.54(a)(3) will control future changes, information that had been proposed for inclusion in UFSAR Section 13.8.6 will now be located in PBAPS UFSAR Appendix D. Revised pages reflecting the proposed changes in the QAPD related to ISEG are provided in Attachment 3.

Additionally, we request that our original Technical Specification Change Request dated November 14, 1994 be revised as follows:

April 10, 1995
Page 3

- (1) the requirements of Technical Specification (TS) Section 6.5.2.7 will be relocated to the PBAPS QAPD such that they will be controlled by 10 CFR 50.54(a)(3); and
- (2) the requirements of TS Section 6.5.2.10 be revised to delete reference to TS Sections 6.5.2.7 and 6.5.2.8.

Revised pages 252 and 252a for each Unit are enclosed at Attachment 4. We have concluded that the proposed revision does not affect the conclusions previously submitted with our original submittal regarding a safety assessment, information supporting a finding of No Significant Hazards Consideration, and information supporting an Environmental Assessment.

If you have any questions, please contact us.

Very truly yours,

G. A. Hunger, Jr.

G. A. Hunger, Jr.
Director - Licensing

JLP/esr

Enclosures: Affidavit, Attachment 1, Attachment 2, Attachment 3, Attachment 4

cc: T. T. Martin, Administrator, Region I, USNRC (w/ enclosures)
W. L. Schmidt, USNRC Senior Resident Inspector, PBAPS (w/ enclosures)
R. R. Janati, Commonwealth of Pennsylvania (w/ enclosures)
M. C. Modes, Chief, Materials Section, Region I, USNRC (w/ enclosures)

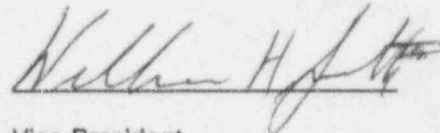
COMMONWEALTH OF PENNSYLVANIA :

:

COUNTY OF CHESTER :

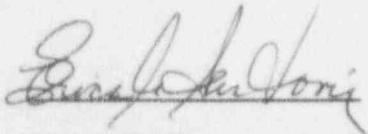
W. H. Smith, III, being first duly sworn, deposes and says:

That he is Vice President of PECO Energy Company, the Applicant herein; that he has read the Enclosed Response to the NRC Request for Additional Information dated February 23, 1995, concerning Technical Specifications Change Requests (Numbers 94-11, 94-12, and 94-13) for Peach Bottom Facility Operating Licenses DPR-44 and DPR-56, 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.



Vice President

Subscribed and sworn to
before me this 10th day
of April 1995.



Notary Public

Notarial Seal
Erica A. Santon, Notary Public
Tredyffrin Twp., Chester County
My Commission Expires July 10, 1995

ATTACHMENT 1

**Response to Request for Additional Information
Peach Bottom Atomic Power Station, Units 2 and 3**

Question

PECO proposes to relocate the audit topics and frequencies in Technical Specification (TS) Section 6.5.2.8 (Nuclear Safety Review Board [NRB]) to the Peach Bottom Updated Final Safety Analysis Report (UFSAR) and eliminate the reference to NRB audits in Environmental TS Section 7.1.

The staff finds that additional information will be needed to complete the review. While the relocation of the items to a licensee controlled document is acceptable, the staff's position is that the audit topics and frequencies should be relocated such that they be will be controlled by 10 CFR 50.54(a)(3), i.e., Section 17 of the UFSAR or the QAPD. Please provided descriptions as to where these items will be relocated.

Once this information is received from PECO, additional consideration of this specific change to relocate the audit topics and frequencies in TS Section 6.5.2.8 NRB to the Peach Bottom UFSAR and eliminate the reference to NRB audits in Environmental TS Section 7.1 will be pursued.

Response

PECO Energy proposes to relocate audit topics and frequencies in TS Section 6.5.2.8 to the Peach Bottom Atomic Power Station Quality Assurance Program description such that they will be controlled by 10 CFR 50.54(a)(3). PECO Energy also proposes to change the reference in Environmental TS Section 7.1 from Section 6.5 of Appendix A to the Operating License to the Quality Assurance Program as contained in proposed Environmental TS page 48 transmitted with our letter dated November 14, 1994.