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SEP 07 1984

JOHN S. KEMPER
VICE-PRESIDENT
ENGINEERING AND RESEARCH

Mr. A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docket Nos.: 50-352
50-353

Subject: Limerick Generating Station, Units 1 and 2
Additional Information for Licensee
Qualification Branch

Reference: Telecon between NRC (Bob Benedict) and
PECO on September 5, 1984.

Attachment: Draft Page Changes to FSAR

File: GOVT 1-1 (NRC)

Dear Mr. Schwencer:

The reference telecon concerned proposed revisions to FSAR sections which discuss the operation of the Nuclear Review Board. These revisions are incorporated in the attached draft page changes and will be incorporated in the FSAR revision scheduled for October 1984.

Sincerely,

John Ballagh
for
JS Kemper

RDC/gra/09058

cc: See Attached Service List

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cc: Judge Lawrence Brenner	(w/o enclosure)
Judge Peter A. Morris	(w/o enclosure)
Judge Richard F. Cole	(w/o enclosure)
Judge Christine N. Kohl	(w/o enclosure)
Judge Gary J. Edles	(w/o enclosure)
Judge Reginald L. Gotchy	(w/o enclosure)
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Timothy R. S. Campbell	(w/o enclosure)

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values. Judicious application of dose extensions is exercised by review of prior data and analysis of the need for the exposure. The health physics procedures provide for appropriate documentation of reviews, surveys, analyses, and investigations such that corrective action or modification may be accomplished and subsequent data may be compared to the original data to verify effectiveness of the change. The need for modification to satisfy ALARA shall be based on consideration of the economics of equipment modification in relation to benefits to health and safety and other societal and socioeconomic considerations, including the utilization of atomic energy in the public interest.

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To verify that the health physics operations at the station are functioning within the ALARA concept, a formal review shall be performed under the cognizance of the ~~Operating and Safety Review (OSR) Committee~~ every three years (based upon the date of commercial operation of Unit 1). The review shall include review of applicable station procedures and practices, exposure records, the content of training programs which affect ALARA considerations, and consultation with the plant staff health physics group. The objective of the review is to evaluate the adequacy of the ALARA effort and, as appropriate, to determine means to lower exposures. The results of the review shall be documented, including identification of the procedures and records reviewed, the review team's evaluation, and any recommendations for improvements.

12.1.2 DESIGN CONSIDERATIONS

This section describes those considerations which are applied to the plant design for the purpose of incorporating features which provide for maintaining occupational radiation exposures ALARA.

Refer to Sections 12.3.1, 12.3.2, and 12.3.3 for details of design for maintaining personnel radiation exposures ALARA.

Experiences and data from operating plants are evaluated to decide if and how equipment or facility designs can be improved to reduce overall plant personnel exposures. During plant design, operating reports and data such as that given in WASH-1311, NUREG-75/032, NUREG-109 and Compilation and Analysis of Data on Occupational Radiation Exposure Experienced at Operating Nuclear Power Plants, AIF, September 1974 (Refs 12.1-1 thru 12.1-4 respectively), are reviewed to determine which operations, procedures or types of equipment were most significant in producing personnel exposures. Methods to mitigate such exposures have been implemented wherever possible and practicable.

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proper conduct of the radiation protection program and access to offsite management. The Director - Radiation Protection Section also provides a means for ensuring that applicable experience gained at Limerick or Peach Bottom is reflected in the procedures and practices of both stations. The Director - Radiation Protection Section meets the qualifications of "engineer-in-charge" as defined in Section 4.6.1 of ANSI/ANS-3.1-1978 in regard to the support provided.

The Nuclear Training Section is responsible for the training programs for licensed NRC operators (qualification and requalification), replacement training for licensed operators and senior operators, and non-licensed operations personnel and general employee training. The section supervises, conducts, and keeps records of the necessary training. The section is responsible for preparing and updating the training program.

The Nuclear Safety Section, under the supervision of an Engineer-In-Charge, reports to the Superintendent-Nuclear Services on matters of a routine nature and to the Chairman of the ~~Operating and Safety Review Committee~~ on matters of a safety-related nature. The Section is responsible for independently examining the safety-related activities at the nuclear plants operated by the Philadelphia Electric Company and providing support to the ~~Operating and Safety Review Committee~~. The Nuclear Safety Section consists of three groups: a Corporate Independent Safety Engineering Group (ISEG), an onsite ISEG at Limerick Generating Station, and an onsite ISEG at Peach Bottom Atomic Power Station. The Engineer-In-Charge of the Nuclear Safety Section meets the qualifications of "engineer-in-charge" as defined in section 4.6.1 of ANSI/ANS-3.1-1978.

13.1.1.1.2 Maintenance Division

The Maintenance Division is under the direction of a Superintendent and is responsible for performing maintenance and repair work under the direction and coordination of the Maintenance Engineer on the plant operating staff. Personnel in the Maintenance Division have the benefit of experience gained through years of providing maintenance support for Peach Bottom Atomic Power Station - Units 2 and 3.

13.1.1.2 Engineering and Research Department

The Engineering and Research Department is under the direction of the Vice-President. The Vice-President is responsible for the establishment of policies directed toward the design, construction, and modification of Limerick Generating Station in accordance with applicable codes, standards, and regulations.

The Engineering and Research Department reviewed and approved material and component specifications, approved procurements,

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- j. Review of the emergency plan and implementing procedures and submittal of recommended changes to the NRB

The PORC shall:

- a. Recommend in writing to the Station Superintendent approval or disapproval of items considered under the first four areas described above
- b. Render determinations in writing with regard to whether or not each item considered under the first four areas described above constitutes an unreviewed safety question
- c. Provide immediate written notification to the Superintendent, Generation Division - Nuclear and the NRB of disagreement between the PORC and the Station Superintendent. The Station Superintendent shall have the responsibility for resolution of such disagreements.

The PORC shall maintain written minutes of each meeting and copies shall be provided to the Superintendent, Generation Division - Nuclear and to the NRB.

13.4.3 INDEPENDENT REVIEW

An NRB shall be established and functioning prior to initial fuel load of Unit 1. The NRB shall provide offsite, independent review of operating activities. This function is a method of detecting trends that may not be apparent to the day-to-day observer. The NRB shall be established in a written charter that includes membership, responsibilities, reporting requirements, areas to be reviewed, and other aspects needed for the operation of the NRB.

The NRB shall consist of a chairman and at least four other members with no more than a minority being members of the plant operating staff. The NRB shall collectively have the experience and competence required to review plant operations, nuclear engineering, chemistry and radiochemistry, metallurgy, nondestructive testing, instrumentation and control, radiological safety, mechanical and electrical engineering, administrative controls, quality assurance practices, and other areas that may affect nuclear safety. The NRB can call upon various departments within PECO for technical assistance and shall utilize consultants, as determined by the chairman, to provide expert advice. All alternate members shall be appointed in writing, by the chairman, to serve on a temporary basis; however, no more than two alternates shall participate as voting members in NRB activities at any one time. The NRB may appoint, in writing (such as in Board meeting minutes), subcommittees for purposes

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Alternates shall serve on a continuing basis, i.e. they shall receive correspondence sent to NRB members with regard to NRB activities and shall be invited to attend all NRB meetings in order to stay informed of issues being addressed by the NRB. Alternates shall

function in a manner similar to that of the members except that alternates shall only vote when the member for whom they are the alternate is absent.

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such as performing reviews or studies in areas of particular expertise or for performing special investigations.

The NRB consists of the following members and their alternates:

<u>Members</u>	<u>Alternate</u>
• Manager - Engineering & Research , Chairman	
• Manager - Electric Production, Vice Chairman	Superintendent - Nuclear Generation Division
• Manager - Fossil-Hydro Production	• Superintendent - Fossil-Hydro Generation Division
Vice President - Engineering & Research, Vice-Chairman	Chief Design Engineer
• Superintendent - Maintenance Division	• Superintendent - Electrical ^{Mechanical} Section Maintenance Division
• Director - Environmental Affairs	• Chief Chemist
• Superintendent - Quality Assurance Division	• Engineer-in-Charge - Quality Assurance Section - Engineering and Research
Electric Production	
• Chief Mechanical Engineer, Alternate Chairman	• Engineer-in-Charge - Power Plant Design Section
• Director - Research and Testing	• Engineer-in-Charge - Energy Conversion Research Section
^{Assistant} Chief Electrical Engineer, Alternate Chairman	• Engineer-in-Charge - Control Engineering Section • Supervising Engineer - Plant Control Systems
• Chairman - Nuclear Review Board ⁽¹⁾	• General Manager - Hope Creek ⁽¹⁾
Salem Generating Station	Generating Station

⁽¹⁾ Employees of Public Service Electric and Gas Company.

The members and alternates of the NRB shall have an academic degree ~~shall meet the qualifications of~~ section 4.7.2 of ANSI/ANS-3.1-1978. The Chairman and Vice-Chairman of the NRB meet the qualifications of section 4.7.1 of ANSI/ANS-3.1-1978. ^{in an engineering or physical science field, a} minimum of five years technical experience, of which three years shall be of The NRB, and those performing reviews or audits under the cognizance of the NRB, shall have access to records and personnel as necessary to properly perform their functions. The NRB shall be kept current on events within its responsibility by reviewing reports and by the activities of the Board members.

professional level experience shall be in one or more of the areas listed in the second paragraph of this section.

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The NRB shall meet at least once every calendar quarter during the initial year of Unit 1 operation following fuel loading, and at least once every six months (or more often as determined by the chairman) thereafter. A quorum shall consist of the at least chairman, or ~~his~~ designated alternate, and four members or alternates. No more than a minority of the quorum shall have line responsibility for operation of the plant. *but not less than one-half of the voting*

The NRB shall review:

- a. The safety evaluations for 1) changes to procedures, equipment or systems and 2) tests or experiments completed under the provision of 10 CFR 50.59, to verify that such actions did not constitute an unreviewed safety question.
- b. Proposed changes to procedures, equipment or systems that involve an unreviewed safety question as defined in 10 CFR Part 50.59
- c. Proposed tests or experiments that involve an unreviewed safety question as defined in 10 CFR Part 50.59
- d. Proposed changes to technical specifications or the operating license prior to submittal to the NRC
- e. Violations of codes, regulations, orders, technical specifications, license requirements, or of internal procedures or instructions having nuclear safety significance. This shall normally be accomplished by review of PORC meeting minutes, special reports, or reports of audits.
- f. Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety. This shall normally be accomplished by review of PORC meeting minutes, special reports, or reports of audits.

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- d. Track implementation status of significant corrective action with regard to ISEG recommendations
- e. Provide onsite technical assistance, when required, to assist in Limerick ISEG investigations
- f. Provide an interface between the Limerick ISEG and Engineering and Research Department personnel, located in the corporate offices, who design plant modifications.

The Operating Experience Assessment Committee will be composed of the Operations Engineers from plant staff from both Limerick and Peach Bottom, engineers from ISEG groups at both Limerick and Peach Bottom, the Superintendent-Nuclear Training Section, an engineer from Electric Production Department's Quality Assurance Division, an engineer from Electric Production Department's Licensing Section, and engineers from Engineering and Research Department's Mechanical Engineering and Electric Engineering Divisions. The members will be degreed engineers that have, as a minimum, several years of nuclear plant operations or design experience. The Chairman of the committee will be the Engineer-In-Charge of the Nuclear Safety Section. The Vice-Chairman will be the Senior Engineer-Special Projects of the Licensing Section. The committee members will receive, on a continuing basis, significant internal and external operating experience information and will meet monthly to discuss it. This committee will provide a broad interdisciplinary review and may make recommendations on improving operations, procedures, training, and maintenance. The ISEGs will inform the committee with results of their reviews of operating experience and operating problems. This committee will facilitate the exchange of information on operating and design problems encountered at both Limerick and Peach Bottom.

Also, because the Limerick and Peach Bottom plant designs are similar, many of the Peach Bottom ISEG's assessments, particularly in the areas of design, training, corrective maintenance and, to some extent, operations, may be directly applicable to Limerick and vice versa. The Peach Bottom ISEG will be similar in composition to and will have similar responsibilities as the Limerick ISEG.

The Engineer-In-Charge of the Nuclear Safety Section reports to the Superintendent-Nuclear Services on matters of a routine nature and to the Chairman of the Operating and Safety Review Committee on matters of a safety-related nature.

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The following paragraphs describe the administrative procedures expected to be employed. The numbers of procedures and their specific content may be altered as the procedures are developed and experience is gained in their implementation.

13.5.1.1 Procedure for Preparation and Control of Administrative Procedures

This procedure shall provide the measures to control and coordinate the preparation, review, approval, and issuance of administrative procedures. This procedure shall require that administrative procedures be distributed to appropriate personnel in accordance with current distribution lists to ensure that outdated or inappropriate procedures are not used. The format and content of administrative procedures shall be defined as:

- a. Descriptive title, revision number, and date
- b. Statement of applicability or purpose
- c. References, including technical specifications or procedures as applicable
- d. Prerequisites when there are independent actions or procedures that must be completed prior to using the procedure
- e. Procedure section. The procedure shall provide the steps needed to perform the task in the degree of detail necessary to ensure correct, efficient performance without direct supervision or undue reliance on memory. This section may also provide criteria statements to be implemented by other procedures.

To ensure systematic review and feedback, this procedure shall require that administrative procedures be reviewed at a specified frequency of no less than 5 years (a procedure revision constitutes a review) and following unusual incidents that reflect adversely on the adequacy of these procedures.

13.5.1.2 Procedure for Plant Operations Review Committee

This procedure shall define the requirements of membership, meeting frequency, quorum, responsibilities, authority, and records for the PORC in implementation of technical specification provisions. The PORC shall review significant conditions adverse to plant safety to ensure that the cause of the condition is identified, that corrective action is taken and documented, and that appropriate subjects are referred to the ~~Operating and Safety Review (O&SR) committee.~~ ←
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quality in this activity. Mechanisms such as shift and daily written reports, plots, and log books will be reviewed by appropriate supervision as specified in Administrative Procedures. Inspections and reviews will also be conducted by senior plant supervision as defined in Administrative Procedures.

17.2A.2.5

Mechanical and electrical maintenance at LGS will be performed by the Maintenance Division of the Electric Production Department as a service to the operating organization. The Maintenance Division is organizationally independent of the plant operating staff and reports through its Superintendent to departmental management. The Maintenance Division ~~has a Nuclear Branch which~~ shall assign personnel to the station to provide quality control checking, inspection, and engineering support. The Engineer-Maintenance who is part of the plant staff coordinates and serves as the operating staff - Maintenance Division interfacing agent. Only qualified craftsmen are utilized to perform maintenance work. First and second level supervision have had specific quality training and are recognized as informal but a most important means of controlling quality. Installation of new components or the physical change in systems of a major nature is considered a modification activity which will normally be implemented by the Engineering and Research Department. Quality assurance measures and organization shall be implemented in a fashion similar to that used during plant design and construction with the additional assurance of review and approval by the Plant Operations Review Committee and, as appropriate, ~~Operations and Safety Review Committee.~~ the Nuclear Review Board

17.2A.2.6

The procurement of spare parts, materials, and services for LGS is initiated by cognizant personnel in accordance with approved policies and procedures. The Stores Division is an independent organization functioning as a service group to the Electric Production Department. The ordering, receipt, storage and issuance is accomplished in accordance with Stores Division, Systems Division, and plant procedures which incorporate suitable measures to assure quality. Requisitions for materials or services are transmitted from the Stores Division to the Purchasing Division where buyers and purchasing agents execute the order in accordance with Company purchasing procedures and policies.

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- a. Reviewed and approved by qualified personnel to ensure that they are technically adequate and that the applicable quality requirements are stated
- b. Issued in a controlled manner
- c. Changed, reviewed, and approved in the same manner as the original or as specified in the procedure
- d. Available at the location where the activity will be performed prior to commencing the work
- e. Controlled to prevent the inadvertent use of obsolete or superseded documents.

17.2A.6.4

LGS⁰QA Plan and Quality Assurance Division procedures and revisions thereto shall be controlled as per QA Division Procedures and Instructions Manual under the authority of the Superintendent, QA Division. ←

17.2A.6.5

LGS activity instructions, procedures, and drawings, delineated in the document control requirements of the QA Plan, shall be procedurally controlled and approved in accordance with the Administrative Procedures under the authority of designated, responsible management. These controls establish individual responsibilities for the preparation, review, approval, and distribution that apply to the various quality related activities. ←

17.2A.6.6

Temporary and emergency procedure change mechanisms shall be provided in the Administrative Procedure Controls.

17.2A.6.7

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passed the required inspections and tests are used, installed, or operated. These measures shall include procedures for control of status indicators, including the authority for application and removal of tags, markings, labels, and stamps.

17.2A.14.3

Measures shall also provide for indicating the operating status of systems and components of the nuclear power plant, such as by tagging valves and switches, to prevent inadvertent operation.

The operating status of components under test or inspection shall be indicated and controlled through the use of the handbook for permits and blocking, procedure check lists, or logs to prevent inadvertent use.

17.2A.14.4

Defective material, parts or components shall be promptly identified, tagged and recorded or otherwise controlled to indicate operating status of such equipment and to prevent its inadvertent use.

17.2A.14.5

Implementation of these measures shall be verified through the QA Division auditing program conducted in accordance with the QA Plan. These activities shall assure that the required inspections and tests are procedurally controlled as required by the QA Plan. ←

17.2A.15 NONCONFORMING MATERIALS, PARTS, OR COMPONENTS ←

17.2A.15.1

Measures shall be established and implemented to control materials, parts, or components which do not conform to requirements to prevent their inadvertent use or installation. The measures established shall include, as appropriate, administrative and/or implementing procedures for the following functions for nonconforming materials, parts, or components.

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17.2A.17 QUALITY ASSURANCE RECORDS

17.2A.17.1

Sufficient records shall be maintained in accordance with the Administrative and implementing procedures to provide documentary evidence that activities affecting quality are performed adequately and in compliance with the Quality Assurance program. The requirements shall include collection, filing, storing, maintenance and disposition of records that are required by the QA Plan and by other codes, standards, specifications, or regulatory requirements. QA records shall include operating logs, maintenance and modification procedures, and related inspection results, reportable occurrences, and other records required by technical specifications. The procedures to be employed to perform the required activities shall be planned and documented.

17.2A.17.2

The significance of the event covered by a record type and the contribution of the record to the ability to reconstruct significant events shall be considered in establishing retention periods. Retention periods shall satisfy applicable statutory requirements.

17.2A.17.3

Storage requirements for the maintenance, preservation and protection of records from the time of entry into the receipt control system until their ultimate disposal shall be established.

The records shall be stored in predetermined locations as necessary to meet the requirements of applicable standards, codes, and regulatory agencies.

17.2A.17.4

Applicable design specifications, procurement documents, test procedures, operational procedures or other documents shall specify the quality records to be generated. All such records

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17.2A.18.6

Audits and surveillances shall be performed by personnel from the Quality Assurance Division, who are independent of any direct responsibilities for the performance of activities which they will audit. The QA Division may request assistance of personnel from other disciplines who are independent of areas being audited.

The Superintendent, QA Division shall establish the auditing program personnel qualifications and the requirements for the use of technical specialists to accomplish the auditing of the quality assurance program. Personnel shall be selected for quality assurance auditing assignments based on experience or training which establish that their qualifications are commensurate with the complexity or special nature of the activities to be audited. In selecting personnel for auditing assignments, consideration shall be given to special abilities, specialized technical training, prior pertinent experience, personal characteristics and education.

17.2A.18.7

Audit and Surveillance procedures shall require that nonconformances which are identified be documented in sufficient detail to assure that required corrective action can be effectively carried out by the audited organization. Corrective action may be recommended, as appropriate, by the Superintendent, QA Division.

When corrective action measures are indicated, re-audits of applicable areas shall be conducted to assure implementation and effectiveness of the corrective actions.

17.2A.18.8

Audits performed under the cognizance of the ~~OSCR Committee~~ are discussed in Section 13.4.

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17.2A.18.9

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3. ANSI N45.2.4, Section 7, Data Analysis and Evaluation - A program for processing, reviewing, and analyzing electrical equipment and instrumentation inspection and test data for acceptability is provided in the administrative procedures which govern the repair, maintenance, and testing of electrical equipment and instrumentation. Maintenance is controlled through the use of a work request form that has provisions for cognizant personnel sign-off after completion of the work. Functional testing and calibration procedures include provisions for review, analysis of data, and approval by signature of cognizant personnel.
- b. Regulatory Guide 1.33, Revision 2, February 1978, "Quality Assurance Program Requirements (Operations)." Endorses ANSI N18.7 - 1976/ANS 3.2.

PECO shall comply with Regulatory Guide 1.33 - Revision 2, February 1978 and ANSI N18.7 - 1976/ANS 3.2 except for the following clarifications or alternates:

1. Regulatory Guide 1.33, Section C.4 and ANSI N18.7 - 1976/ANS 3.2, Section 4.5, Audit Program - The audit program carried out by the Quality Assurance Division shall be performed in such a manner that individual activities of the EPQA Plan are investigated within a period of 2 years. This investigation shall consist of either audits or surveillances. See Section 17.2A.18. 
2. Regulatory Guide 1.33, Section C.4.c and ANSI N18.7 - 1976/ANS 3.2, Section 4.5, Audit Program (second paragraph) - The word "performance" means the implementation of the training program, participation in the training program by individuals, and the comparison of documented qualifications with established requirements. Activities and records associated with confidential employee performance reviews and subjective evaluation of personnel capabilities are specifically excluded from the audit program.
3. Regulatory Guide 1.33, Section C.5.c and ANSI N18.7 - 1976/ANS 3.2, Section 5.2.4, Special Orders and Section 5.2.5, Temporary Procedures - The types of procedures described in these sections are not expected to be used at LGS. Administrative Procedures will specify mechanisms for temporary changes to existing procedures.

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4. ANSI N18.7 - 1976/ANS 3.2, Section 4.3, Independent Review Program - The description and activities of the ~~Operation and Safety Review Committee~~ will be as specified in the LGS Technical Specifications. 
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5. ANSI N18.7 - 1976/ANS 3.2, Section 4.3.2.2, Meeting Frequency - The "period of initial operation" means "one year after fuel loading of Unit 1".
6. Deleted |
7. ANSI N18.7 - 1976/ANS 3.2, Section 4.4, Review Activities of the Onsite Operating Organization - The word "verify" does not imply review or certification by supervisory personnel of every day-to-day operating activity; rather, the performance of reviews of documents and logs and monitoring activities by supervisory personnel in accordance with station procedures and practices is considered to meet this requirement.
8. ANSI N18.7 - 1976/ANS 3.2, Section 5.2.1, Responsibilities and Authorities of Operating Personnel - Item (4) is changed to read: "The responsibility to respond conservatively to instrument indications including the case in which the credibility of the indication is in doubt". This statement permits the operator to compare Control Room instruments and infer instrument error without proving it such as by calibration checks.
9. ANSI N18.7 - 1976/ANS 3.2, Section 5.2.2, Procedure Adherence - The term "supervisor in charge of the shift"

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under the radiation protection program and specific requirements listed on the Radiation Work Permit for entry in Zone II areas.

2. ANSI N45.2.3, Section 2.1, Planning - Material accountability for Zones II and III shall be controlled by procedural requirements, periodic inspections and surveillance of areas for acceptable housekeeping practices. Implementing procedures for activities such as maintenance and modifications require housekeeping and cleanliness inspections of areas and equipment to eliminate foreign materials that may have a detrimental effect. Post Maintenance or modification inspections for housekeeping and cleanliness shall be conducted and documented in accordance with administrative controls.

3. ANSI N45.2.3, Section 2.1 Planning - Personnel accountability for Zone III will be controlled as determined by the administrative controls for locked doors and radiation work permit requirements in lieu of specific access registers.

- f. Regulatory Guide 1.58, Revision 1, "Qualification of Nuclear Power Plant Inspection, Examination, and Testing Personnel." Endorses ANSI N45.2.6 - 1978.

Philadelphia Electric Company ^{shall} ~~will~~ comply with Regulatory Guide 1.58, Rev. 1 and ANSI N45.2.6-1978 except for the following clarification and alternates: ←

1. Regulatory Guide 1.58, Revision 1, section C.1, and ANSI N45.2.6-1978, subsection 1.2, states that the standard applies to "personnel who perform inspections, examinations, and tests." Philadelphia Electric Company personnel, who inspect equipment as part of plant maintenance, in other than a quality control function, and plant staff personnel (as defined in the Limerick Technical Specifications) who approve test procedures and tests results and direct or supervise the conduct of individual tests, will be qualified in accordance with ANSI/ANS 3.1-1978 in lieu of ANSI N45.2.6-1978.
2. Regulatory Guide 1.58, Revision 1, section C.4 and ANSI N45.2.6-1978, subsection 1.5, discuss the applicability of documents referenced in the standard. In lieu of the

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2. ANSI/ASME N45.2.12, Section 4.7.6, Reporting - The audit report shall be issued with 30 working days after the post-audit conference. ←

- n. Regulatory Guide 1.146, August 1980, "Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants" Endorses ANSI/ASME N45.2.23-1978.

Philadelphia Electric Company shall comply with Regulatory Guide 1.146, August 1980 and ANSI/ASME N45.2.23-1978 except for the following alternate:

1. ANSI/ASME N45.2.23-1978, subsection 2.3, states requirements for qualification of auditors. In lieu of the stated requirements, PECO will qualify personnel in accordance with requirements presented below. These alternate requirements will provide PECO with sufficient flexibility to qualify competent personnel with initial technical experience in a more effective manner. The prororation of credits between initial experience requirements and additional experience gained as an assistant to a Lead Auditor ensures that highly qualified personnel will be available as audit personnel in a more timely fashion.

Substitute the following for Paragraph 2.3.1 of ANSI/ASME N45.2.23-1978.

2.3.1 Education and Experience. The prospective Lead Auditor shall have verifiable evidence that a minimum of ten (10) credits under the following scoring system have been accumulated.

2.3.1.1 Education (4 credits maximum). Associate degrees from an accredited institution score one (1) credit or if the degree is an engineering, physical

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17.2B.10.7

Construction Division inspectors for quality-affecting activities are Electrical Construction Engineers or Field Assistants and Mechanical Construction Engineers or Field Assistants. Construction Engineers inspect work of the Field Forces personnel who perform quality-affecting activities. Construction Engineers have sufficient authority to stop work or to control further installation work. The Construction Engineers are separated from the Field Forces by three levels of supervision.

17.2B.10.8

All Engineering and Research Department inspectors of quality-affecting activities receive periodic QA/QC training from their respective Divisions in order to maintain their proficiency. Inspectors are certified by their respective Divisions to perform inspections at the applicable level of capability as defined in ANSI N45.2.6-1978. Job performance of each inspector is periodically evaluated to ensure that the inspector is performing in accordance with the qualifications specified for the job. Qualification requirements for nondestructive testing personnel are described in Section 17.2B.9. ←

17.2B.10.9

PECO Engineering and Research Department commitments to USNRC Regulatory Guides are described in Appendix 17.2B.II.

17.2B.11 TEST CONTROL

17.2B.11.1

Tests to demonstrate that items will perform satisfactorily in service shall be defined in drawings, specifications, Engineering Work Letters, Construction Memoranda, the Field Engineering memoranda, the Research and Testing Division memoranda, or installation procedures, as appropriate for the activity. Where appropriate, vendor documents and instructions shall be used as input for determining required tests.

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2.7, each component is treated on an individual basis. The Engineering and Research Department requires that each specification contain handling, storage, packaging, and shipping information. This information incorporates the guidance and recommendations which are appropriate to each classification for packaging, shipping, handling, and storage of equipment or materials described in the specification.

- e. Regulatory Guide 1.39, Rev. 2, September 1977, Housekeeping Requirements for Water-Cooled Nuclear Power Plants. Endorses ANSI N45.2.3-1973.

The Engineering and Research Department follows Regulatory Guide 1.39, Rev. 2, September 1977 and ANSI N45.2.3-1973 exclusive of other documents referenced therein. This is accomplished by requiring Engineering and Research Department personnel who work at the plant to follow the administrative controls for housekeeping which are established by the Electric Production Department. Therefore, the alternatives to ANSI N45.2.3-1973 described in Appendix 17.2.A.II apply to the Engineering and Research Department at the plant site.

Housekeeping/cleanliness requirements for that material storage and plant modification work which is the responsibility of Engineering and Research Department personnel are included in the Engineering and Research Department procedures governing these activities.

- f. Regulatory Guide 1.54, June 1973, Quality Assurance Requirements for Protective Coatings applied to Water-Cooled Nuclear Power Plants. Endorses ANSI N101.4-1972.

The Engineering and Research Department follows Regulatory Guide 1.54, June, 1973 and ANSI N101.4-1972 exclusive of other documents referenced therein. One particular of ANSI N101.4-1972 will be implemented by the Engineering and Research Department through alternate equivalent means described below:

In Para. (5) and (6) will initiate, prior to coating application, a procedure(s) that will ensure satisfactory application and inspection of coatings applied to Nuclear Facilities.

- g. Regulatory Guide 1.58, Rev. 1, September 1980, Qualification of Nuclear Power Plant Inspection, Examination, and Testing Personnel. Endorses ANSI N45.2.6-1978.

Philadelphia Electric Company ^{shall} ~~will~~ comply with Regulatory Guide 1.58, Rev. 1 and ANSI N45.2.6-1978 except for the following clarification and alternates: ←

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15-662

QUESTION 260.16

Provide a description of how management (above or outside the QA organization) regularly assesses the scope, status, adequacy, and compliance of the QA program to 10 CFR Part 50, Appendix B. These measures should include: (SRP 17.1, 2C1)

- a. Frequent contact with program status through reports, meetings, and/or audits.
- b. Performance of an annual assessment preplanned and documented. Corrective action is identified and tracked.

RESPONSE

Management (EP Vice President or Manager) regularly assesses the scope, status, adequacy, and compliance of the QA program to 10CFR50, Appendix B.

- a. Management is appraised of QA program status through frequent contacts in staff meetings and audit reports (EP, Joint Utility Management Audits, INPO, NRC, PECO QA Audits).

NRB

- b. An annual assessment and review of the QA program is preplanned and documented. This annual assessment addresses the scope, status, and adequacy of the QA Program, along with the degree of compliance to the program. Corrective action is identified and tracked.

Section 17.2A.2.7 states: "The Office of the Vice President - Electric Production Department is informed on a continuing basis of the status and effectiveness of the quality assurance program through reports at Vice-Presidential Staff Meetings."

Section 17.2B.2.7 has been changed to provide the requested information.

LGS FSAR

DRAFT

QUESTION 260.51

Describe those provisions for analyzing nonconformances for trends and identify the upper levels of management responsible for periodic review and assessment of these quality trends. (SRP 17.1, 15.5)

RESPONSE

Section 17.2.1.2.3.1 states in part: The Superintendent, Quality Assurance Division, has the following responsibilities and authorities:

- f. Determine the ongoing status and adequacy of the EP QA Plan through regular review of the QA Auditing Program, identification and investigation of problem areas, and determination of timely and effective steps taken to correct deficiencies.

Section 17.2.1.2.3.2 states in part: The Engineer-QA is responsible for the following:

- c. Keep the Superintendent, Quality Assurance Division, informed of status of Quality Assurance effort and of significant problem areas.

Electric Production Staff Meetings are regularly held which assess the status and adequacy of nonconformances, which includes quality trending of audit and surveillance findings, NRC enforcement actions, LERs, and NRC IE inspections, of the QA Program to 10CFR50, Appendix B.

Annual assessment of the status and adequacy of the QA Program is documented and sent to the Vice President, Electric Production, and other cognizant Management and ~~Q&SR Committee~~.

NUCLEAR REVIEW BOARD. ←

Measures shall be established for analyzing trends of nonconformances. The Vice President, Electric Production, shall be notified and periodically review and assess these trends.

Sections 17.2A.16.6, 17.2B.15.1 and 13.4.5 have been revised to provide additional information.

LGS FSAR

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QUESTION 630.21

How is a safety question handled by the review committees?

RESPONSE

As described in Section 13.4.2, the Plant Operations Review Committee (PORC), among other items, is responsible for:

- a. Review of procedures, and changes thereto, as described in Section 13.5 and other procedures or procedure changes, as determined by the Station Superintendent, that affect nuclear safety.
- b. Review of all proposed tests and experiments that may constitute an unreviewed safety question pursuant to 10 CFR Part 50.59.
- c. Review of all proposed changes to technical specifications.
- d. Review of all proposed changes or modifications to safety-related systems or equipment that may constitute an unreviewed safety question pursuant to 10 CFR Part 50.59.

As a part of discharging this responsibility, the PORC will recommend in writing to the Station Superintendent approval or disapproval of items considered under the four areas described above and will render in writing with regard to whether or not each item constitutes an unreviewed safety question. Such items will be included in minutes of meetings which will be provided to the Superintendent, Nuclear Generation Division and to the ~~Operations and Safety Review (O & SR) Committee~~ ^(NRD) for review. Responsibilities for the PORC and ~~O & SR Committee~~ are described in Sections 13.4.2 and 13.4.3, respectively.

Nuclear Review Board
←

NRD

Towards fulfilling the responsibilities described above, the PORC has approved an Administrative Procedure (A-5) for Safety Evaluations. The purpose of this procedure is to provide instructions for the performance, review, and processing of safety evaluations, which are prepared by the plant staff, and therefore comply with 10 CFR 60.59.