

PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

955-65 CHESTERBROOK BLVD.

July 23, 1992

WAYNE, PA 19087-5691

(215) 840-6000

Docket Nos. 50-352
50-353
50-277
50-278

License Nos. NPF-39
NPF-85
DPR-44
DPR-56

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

Subject: Limerick Generating Station, Units 1 and 2
Peach Bottom Atomic Power Station, Units 2 and 3
Request for Relief from Commitment to Audit All
Provisions of Technical Specifications within a
Fixed Period

The Philadelphia Electric Company (PECo) requests relief from its current practice of auditing all major paragraphs of the Limerick Generating Station (LGS), Units 1 and 2, and Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, Technical Specifications (TS) over a four year period. The practice was developed in direct response to an NRC inspection concern for LGS Unit 1 prior to issuance of the operating license for Unit 1 as documented in NRC Inspection Report 50-352/84-21. The concern was closed in NRC Inspection Report 50-352/84-56, based on specific revisions to PECo Quality Assurance Division Procedures (QADPs). Those same procedures were and continue to be applied to PBAPS, Units 2 and 3.

Considerable resources are expended in performing and tracking audits of all TS paragraphs to assure full coverage within four years, at both stations. Since NRC closure of this item, the Nuclear Quality Assurance (NQA) organization has enhanced its oversight capabilities. We consider that devoting our resources to this oversight program, composed of performance and compliance based assessments, surveillances, monitoring, and independent safety engineering, is more effective. Accordingly, these oversight activities are applied to areas affecting plant safety, risk levels, and reliability in a manner which considers current plant conditions, work activities, plant performance indicators, and industry issues. As part of these oversight activities, compliance with the applicable TS is evaluated. If

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this request is approved, the evaluation of TS compliance conducted during performance of oversight program activities will include prior findings, TS changes, and will ensure that the overall sample of items reviewed is not narrowly scoped. We have concluded that this is consistent with the direction that the NRC and the industry are moving as described in NUREG/CR 5151, "Performance Based Inspections," and NUREG-0800, "Standard Review Plan," Section 17.3, "Quality Assurance Program Description, Revision 0." Please note that this request is similar to the change requested by Detroit Edison, and approved by the NRC in its letter dated October 16, 1990 (copies attached).

PECO will continue to perform the TS audits as required by LGS and PBAPS TS Section 6.5.2.8, including the annual audit of the conformance of unit operation to provisions contained within the TS and applicable license conditions as required by TS Section 6.5.2.8a. This audit will concentrate on the following four areas: (1) Full Power or Startup Limiting Conditions for Operation (LCO), (2) the Surveillance Test Program, (3) Clearance and Tagging, and (4) Temporary Plant/Circuit Alterations. While "Clearance and Tagging" and "Temporary Plant/Circuit Alterations" activities are not traditional TS compliance audits, our experience has shown that these audits provide valuable oversight of compliance of plant activities to the TS.

Please contact John B. Cotton at 215-640-5620, if any further information is required.

Sincerely,



G. J. Beck, Manager
Licensing Section
Nuclear Services Department

Attachments

cc: T. T. Martin, Administrator, Region I, USNRC
T. J. Kenny, USNRC Senior Resident Inspector, LGS
J. J. Lyash, USNRC Senior Resident Inspector, PBAPS

Detroit
Edison

William S. Orser
Senior Vice President

Fermi 2
6400 North Dixie Highway
Newport, Michigan 48166
(313) 586-5201

July 2, 1990
NRC-90-0091



Nuclear
Operations

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

References:

- 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43
- 2) NRC Inspection Report No. 50-341/86011,
dated June 13, 1986
- 3) NRC Inspection Report No. 50-341/87028,
dated October 16, 1987
- 4) Detroit Edison letter NRC-88-0237,
dated October 18, 1988
- 5) NRC letter dated August 24, 1989

Subject:

Deletion of 100% Audit Coverage of Technical
Specification Line Items

In April 1986, NRC Inspection 86011, Open Item No. 4, stated that Fermi 2 did not have a documented policy for the time frame in which to complete 100% audit coverage of the Technical Specification line items. Subsequently, Detroit Edison developed a program and revised the applicable procedures to establish a five year time frame in which to complete such audits. The five year time frame began with fuel loading in March of 1985.

In August 1986, Detroit Edison developed a Technical Specification Line Item Matrix which would enable management to assign and track the Technical Specification line items for audit purposes. Approximately three man months were spent on this effort.

The first Technical Specification line item audits began in June 1987. The first five year cycle was completed in March 1990. During that cycle of audits, the audit program did not identify any violation of the Technical Specification sections 2, 3 and 4 items. In 1989 alone, Detroit Edison spent in excess of 3770 man hours conducting Technical Specification line item audits. During the five year cycle approximately 15,000 man hours were spent with no significant findings.

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The commitment to audit 100% of all the Technical Specification line items every five years has required significant Quality Assurance (QA) resources. Rather than adhere to a strictly prescribed compliance-based schedule, QA should have the flexibility to focus audits in suspected weak performance areas or on items significantly affecting plant safety and reliability.

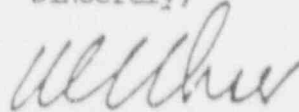
Our preference is to continue to implement our performance-based auditing techniques. The performance-based auditing was introduced by the NRC with NUREG/CR-5151 in June 1983. This audit concept provides much more benefit for the effort expended than a purely compliance-based audit which is characteristic of the Technical Specification line item audits.

In October 1988, a request was submitted to the NRC to grant relief from the 100% audit of Technical Specification line items. This request was subsequently denied. However, since this request has been made, there has been increased emphasis on performance-based auditing. In addition, Detroit Edison's Technical Specification Improvement Program has been completed which provided an extensive review of the Technical Specification line items.

Detroit Edison has concluded that the Technical Specification line item audits have provided little or no benefits and is contrary to performance-based auditing. This lack of benefit was discussed with NRC (Division of Reactor Safety) personnel at the Great Lakes QA Managers meeting in May 1990. They suggested, that Detroit Edison resubmit the request to be granted relief from the commitment to perform 100% audits of the Technical Specification line items.

If you have any questions, please contact Mr. Joseph Pendergast, Compliance Engineer, at (313) 586-1682.

Sincerely,



cc: A. B. Davis
R. W. DeFayette
H. Miller
M. Phillips
W. G. Rogers
J. F. Stang
Region III

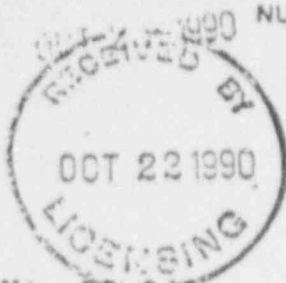
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bcc: R. Andersen
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W. S. ORSER



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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OCT 16 1990

Docket No. 50-941

The Detroit Edison Company
ATTN: W. S. Orser
Senior Vice President
Nuclear Generation
6400 North Dixie Highway
Newport, MI 48166

Gentlemen:

This refers to your letter NRC-90-0091 dated July 2, 1990, in which you requested NRC approval to delete your commitment to complete 100% audit coverage of the Technical Specification line items every five years in order to free up audit resources to broaden the application of performance based auditing principles. The justification for the deletion was based on the fact that you had completed the first 100% audit coverage of the line items, had found only one significant finding over the last four years, and had expended over thirty percent of the entire audit budget to perform them.

This request was discussed with Messrs. W. E. Miller, D. Delk, and others of your staff on October 9, 1990, in the Region III office. Based on our review and evaluation of your request and the above discussion, we understand that future audits and surveillances of technical specification line items will be performance based. In addition, we understand that the annual sampling of the line items to be reviewed will focus on prior findings, technical specification changes, and ensure that the overall sample of items reviewed over time is not narrowly scoped. Based on this understanding, your request is approved.

Please contact Mr. Monte Phillips of my staff (708/790-5530) with any questions you have regarding this matter.

Sincerely,

Hubert J. Miller, Director
Division of Reactor Safety

See Attached Distribution

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OCT 16 1990

Distribution

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