

## PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

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June 19, 1992

NUCLEAR ENGINEERING &amp; SERVICES DEPARTMENT

Docket Nos. 50-277

50-278

50-352

50-353

License Nos. DPR-44

DPR-56

NPF-39

NPF-85

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

Subject: Peach bottom Atomic Power Station, Unit 2 and 3  
 Limerick Generating Station, Units 1 and 2  
 Request for Approval of a Change to the Quality  
 Assurance Program Descriptions  
 Supplemental Information

Gentlemen:

Our letter dated December 13, 1991, requested approval of a change to the Quality Assurance (QA) Program Descriptions incorporated in the Updated Final Safety Analysis Reports (UFSARs) for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, and Limerick Generating Station (LGS), Units 1 and 2. As a result of subsequent discussions with J. Caruso, NRC Region I, and NRC letters dated January 27, 1992, we submitted revised changes to the QA Program Descriptions by letter dated May 4, 1992. Discussions principally covering our self-assessment process were then held with N. Blumberg and E. Benner, NRC Region I, on June 8, 1992, during which additional information was requested. Accordingly, this letter provides the requested information and a revision to the changes to our QA Program Descriptions submitted by our letter dated May 4, 1992. The revised changes are provided in Attachments 1 and 2 for PBAPS and LGS respectively. The remaining marked-up UFSAR pages provided by our December 13, 1991 letter are unaffected by these revised changes.

During the discussions held on June 8, 1992, the following documents were provided to Messrs. Blumberg and Benner.

- The current station procedure governing the periodic procedure review process.
- The station guideline governing the self-assessment process.
- Copies of letters from a number of other licensees (e.g., South Carolina Electric and Gas) requesting NRC approval to

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delete the commitment to perform periodic procedure reviews. These licensee requests have been approved by the NRC.

A comparison of our proposed change and those submitted by the sample of other licensees shows that the bases for the changes are effectively the same. Differences between the programs and processes that are identified as being effective in maintaining procedures current are due to differences in program or process titles only. For example, the program specified in our proposed change as "Programs governing the identification, documentation, and initiation of procedural improvements," results in obtaining the same end user feedback on procedures as the following programs identified in other licensee requests that have been approved by the NRC; plant personnel feedback, the simulator training program, plant operator feedback, and the surveillance test program.

The only difference between our proposed change and those of the other licensees is that we intend to rely on the self-assessment process together with oversight by the Nuclear QA (NQA) organization instead of periodic NQA audits conducted specifically to assess the effectiveness of programs and processes in maintaining procedures current. Self-assessment by each line organization has become a part of the normal conduct of operations within the Philadelphia Electric Company (PECo) Nuclear Group. As such, relying primarily on individual self-assessments as proposed here ensures that the responsibility to maintain procedures current is properly retained by the line organizations that use the procedures. The self-assessment process is required by Nuclear Group policy and associated implementing documents, and includes the requirement that line organization self-assessments, including identified weaknesses, be documented and corrective actions be tracked to completion.

In addition, the self-assessment process includes validation by comparing the self-assessment findings with those of other groups or agencies such as the NRC and the PECO NQA organization, that conduct oversight activities. Furthermore, if one of these groups or agencies identifies a concern that the line organizations did not find as part of its self-assessment, the line organization is responsible for determining the reason the weakness was missed. Therefore, based on the above discussion, we are confident that our self-assessment process together with the oversight assessment of the procedure development programs and processes by the NQA organization will be effective in maintaining the procedures that are now subjected to periodic reviews properly up-to-date.

During the June 8, 1992 discussions, the question of how procedures that appear to be used on a non-routine basis are maintained current, such as emergency operating procedures (EOPs), off-normal procedures (ONPs), procedures that implement the Emergency Plan, and other procedures that would be used during a specific event, was raised. "Non-routine" operating procedures (e.g., EOPs and ONPs) are in fact used routinely during the NRC required initial licensed operator training and the continuing licensed operator requalification training programs. Similarly, Emergency Plan implementing procedures

and other procedures used to respond to an emergency are used during periodic NRC required emergency drills and exercises. Such frequent usage of "non-routine" procedures within the framework of the procedure development programs and processes specified in this proposed change to the QA Program Descriptions, has and will continue to be effective in identifying and implementing needed changes and enhancements to this category of procedures. Accordingly, the proposed changes to the PBAPS and LGS QA Program Descriptions have been revised to specify the applicability of the procedure development programs and processes to "non-routine" procedures.

Finally, the procedure change tracking and trending process specified in this proposed change is being put in effect, and will provide for the timely identification of the reason for procedure changes. By tracking and trending the reason for procedure revisions, we will be able to periodically evaluate this information and take corrective actions as necessary. Therefore, this process provides an additional means of ensuring that the procedure development programs and processes are effective in maintaining procedures current.

If you have any questions or need additional information, please contact us.

Very truly yours,



G. J. Beck, Manager  
Licensing Section

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

ATTACHMENT 1

Peach Bottom Atomic Power Station

17.2.4.7

The Materials Section and Purchasing Department shall only process approved requisitions in accordance with PECO procurement procedures and policies.

17.2.4.7.1

The Purchasing Department shall not alter the technical information or quality assurance requirements on a requisition of any procurement classification identified as QS, QV, QD or NX item without, specifically requested prior, written approval of the requisitioning organization.

17.2.4.8

The procurement document for QS and QV items shall include a provision for the right-of-access to vendor facilities for inspection or audit purposes.

17.2.4.9

Procurement documents shall be maintained in accordance with Section 17.2.17.

17.2.5

#### Instructions, Procedures, and Drawings

17.2.5.1

\*INSERT A\*

Activities associated with the implementation of the Nuclear Quality Assurance Program shall be described and accomplished in accordance with appropriate instructions, procedures, and drawings. \*Administrative procedures shall be written for safety related activities and approved by the appropriate management. QA shall review and approved administrative procedures.

17.2.5.1.1

PBAPS Administrative Procedures shall be written by the plant staff, reviewed by the PORC, approved by the Plant Manager or an appointed designee and the site Quality Manager - NQA, and distributed to predetermined personnel.

17.2.5.1.2

These Administrative Procedures shall contain provisions which clearly delineate the sequence of actions for the preparation, review, approval, and control of activity implementing procedures, instructions and drawings. Exhibit XI delineates the manner in which the criteria of 10CFR50, Appendix B, are implemented for each plant activity.

APPENDIX 17.2A

## REGULATORY GUIDES AND ANSI STANDARDS

## NUCLEAR GROUP

OPERATIONS PHASE QUALITY ASSURANCE

PECO will follow the QA guidelines included in WASH 1284 (10/26/73), "Guidance on Quality Assurance Requirements During the Operations Phase of Nuclear Power Plants"; "ASH 1309 (5/10/74) Guidance on Quality Assurance Requirements During the Construction Phase of Nuclear Power Plants"; WASH 1283, (5/24/74) "Guidance on Quality Assurance Requirements During Design and Procurement Phase of Nuclear Power Plants" - Rev. 1; and other Regulatory Guides and Industry Standards applicable for operations of PBAPS as described in this Appendix.

The Peach Bottom QA Program is described by the PBAPS QA Plan.

PECO has conducted an extensive review of the above listed WASH documents along with the Regulatory Guides and Industry Standards. The standards were reviewed with respect to those activities occurring during the operational phase that are comparable in nature and extent to related activities occurring during initial design and construction. The recommendations and guidance of the Regulatory Guides and ANSI Standards which are applicable to nuclear plant operations are incorporated in the PBAPS QA Plan. Administrative and implementing procedures affected by any revisions of the PBAPS QA Plan will be revised as required in accordance with Administrative Procedures.

Referenced guides or standards addressed by the Regulatory Guides and ANSI Standards are excluded unless addressed separately.

1. Regulatory Guide 1.8 - 3/10/71, Personnel Selection and Training. Endorses ANSI N18.1 - 1971.

COMPLY

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- e. ANSI N45.2.4, Section 6.2.1, Equipment Tests, Installed items requiring calibration are controlled through the preventive maintenance computer tracking system. Tags or labels are not affixed to the item to indicate calibration status.

4. Regulatory Guide 1.33 - November 1972, Quality Assurance Program Requirements (Operation).

PECo shall comply with Regulatory Guide 1.33, 11/72, which endorses ANSI N45.2 - 1971 and ANSI N18.7 - 1972 exclusive of other documents referenced.

\*INSERT B \*

5. Regulatory Guide 1.37 - 3/16/73, QA Requirements for Cleaning of Fluid Systems and Associated Components of Water-cooled NPPs. Endorses ANSI N45.2.1 - 1973.

Decontamination and cleanup of radioactive contaminated systems and components are not included in the scope of this response.

PECo shall comply with Regulatory Guide 1.37 - 3/16/73 and ANSI N45.2.1 - 1973 for those activities occurring during the operational phase that are comparable in nature and extent to related activities occurring during the initial design and construction phase except for the following alternates:

- a. ANSI N45.2.1, Section 3.2, Water Quality Requirements - pH measurements are not required for conductivity values of less than or equal to 1 umho/cm. PECO utilizes pH limits of 5.2 to 8.6 at 25 C, uncorrected for CO<sub>2</sub> and may apply conductivity measurements in place of total dissolved solids.

6. Regulatory Guide 1.38 - 3/16/73, QA Requirements for Packaging, Shipping, Receiving, Storage and Handling of Items for Water-cooled NPPs. Endorses ANSI N45.2.2 - 1972.

PECo shall comply with Regulatory Guide 1.38, 3/16/73, and ANSI N45.2.2 - 1972 for those activities occurring during the operational phase that are comparable in nature and extent to related activities occurring during the initial design and construction phase except for the following alternates:

- a. ANSI N45.2.2, Paragraph 2.7, Classification of Items - PECO does not classify items into the four (4) levels described in this Standard. However, the specific guidance and recommendations which are appropriate to each class are applied to those items packaged, shipped,

#### Insert A

Programmatic controls and processes described in Item 4 of UFSAR Appendix 17.2A are in place to assure that procedures are maintained current. These controls take the place of, and eliminate the need for scheduled periodic reviews and revisions.

#### Insert B

Add: except for the following alternate:

- a. the following programmatic controls and processes are used to assure that procedures are current. These procedures include those that are used on a routine and non-routine (e.g., emergency operating procedures) basis. Non-routine procedures will be maintained current by the programmatic controls and processes specified below since many of these procedures are used frequently during NRC required licensed operator initial and continuing requalification training and during NRC required emergency drills and exercises. These controls take the place of scheduled periodic reviews.

- Plant modification process.
- Amendments to the Technical Specifications.
- Programs governing the identification, documentation, and initiation of procedural improvements.
- Temporary procedure changes.
- Nuclear Quality Assurance assessment activities.
- In-House Event Investigation Program.
- Operating Experience Assessment Program.
- Vendor Manual Program.
- Procedure change tracking and trending process.

Line organizations that have responsibility for procedures or procedure categories will perform biennial self-assessment of the appropriate components that comprise the procedural development program in accordance with established guidelines. These self-assessments will provide a high degree of confidence that the programs and processes identified above are effective in maintaining procedures current. In addition, the Nuclear Quality Assurance (NQA) organization will assess the programs and processes identified above as part of the NQA assessment function that includes audits and surveillances.



ATTACHMENT 2

Limerick Generating Station

LGS UFSAR

17. ANSI N18.7-1976/ANS 3.2, Section 5.2.13.1, Procurement and Document Control, (second sentence) - QA Program requirements or alternate approved methods will be used to ensure quality. Examples of alternates for suppliers without QA programs include: material analysis, sample testing, in-process inspection and monitoring, and design review by PECO.

18. ANSI N18.7-1976/ANS 3.2, Section 5.2.15, Review, Approval and Control of Procedures - The frequency of review of plant procedures is discussed in UFSAR Section 13.5.\*

\*INSERT A

19. ANSI N18.7-1976/ANS 3.2, Section 5.2.17, Inspections - The results of inspections are not always subject to a further evaluation. For example, evaluation beyond that given by inspection-level personnel is not normally required for go/no-go and pass/fail type inspections.

20. ANSI N18.7-1976/ANS 3.2, Section 5.3, Preparation of Instructions and Procedures (last sentence) - The clarification regarding emergency maintenance in Item 12, above, applies.

21. ANSI N18.7-1976/ANS 3.2, Section 5.3.10, Test and Inspection Procedures, (first paragraph) - The clarification regarding test result evaluations in Item 19, above, applies.

22. ANSI N18.7-1976/ANS 3.2, Section 5.3.10, Test and Inspection Procedures, (second paragraph, last sentence) - These procedural aspects will be included when appropriate. For example, "as-found condition" is not applicable to all test and inspection procedures.

- d. Regulatory Guide 1.37, March 1973, "Quality Assurance Requirements for Cleaning of Fluid Systems and Associated Components of Water-Cooled Nuclear Power Plants." Endorses ANSI N45.2.1-1973.

Decontamination and cleanup of radioactively contaminated systems and components are not included in the scope of this response.

Proposed

### 13.5 PLANT PROCEDURES

safety-related activities performed by the plant staff shall be governed by written and approved procedures of a type appropriate to the circumstances and activity, and shall be carried out in accordance with those procedures. Where appropriate for determining that important activities have been satisfactorily accomplished, quantitative or qualitative acceptance criteria shall be included. PECO utilizes the operating experience gained at PSAPS Units 2 & 3 (BWR units similar to LGS) in the development of the procedures.

As fully described below, PECO has implemented ANSI N18.7 (1976)/ANS 3.2, Section 5 as modified by NRC Regulatory Guide 1.33 (Rev 2), paragraphs C.1 and C.5.b through C.5.j, as these documents apply to operating staff activities, in the preparation, content, and control of procedures. \*

INSERT B

Sections 13.5.1.1 through 13.5.1.25 describe administrative procedures. Many of these sections describe how various procedure types (such as maintenance procedures or preventive maintenance procedures) are developed and controlled, whereas other sections describe an administrative process (such as purchasing). Unless stated otherwise in the sections which describe how various procedure types are developed and controlled, the periodic review of the procedures will be on a 2-year basis. Those that will be reviewed with a 5-year frequency are provided with rationale to support this position.

~~Each of the rationales rests at least in part upon the position that the mere passage of time is not sufficient reason to review a procedure for adequacy. The ANSI Standard that recommends the 2 year frequency does not provide a basis for the selection of 2 years. Something must occur during the passage of time that would make the review or revision of a procedure an appropriate action to take. It should be noted that controlled reviews of equipment or system modifications result in the review of applicable procedures for the potential effect of the modification. In addition, standard practices regarding review and response to documents such as NRC Bulletins, Circulars and Notices, INPO documents and industry documents that are screened by the Operating Experience Assessment Program and forwarded for action by the plant staff are in place and will be procedures to be reviewed and revised as appropriate in relation to the review of these individual documents.~~

Proposed

#### Insert A

Add: "except for the following alternative:

- a) programmatic controls and processes described in UFSAR section 13.5 are used to assure that procedures are current. These controls take the place of scheduled periodic reviews."

#### Insert B

"The following programmatic controls and processes are in place to assure that procedures are maintained current. These procedures include those that are used on a routine and non-routine (e.g., emergency operating procedures) basis. Non-routine procedures will be maintained current by the programmatic controls and processes specified below since many of these procedures are used frequently during NRC required licensed operator initial and continuing requalification training and during NRC required emergency drills and exercises. These controls take the place of, and eliminate the need for, scheduled periodic reviews and revisions.

- Plant modification process.
- Amendments to the Technical Specifications.
- Programs governing the identification, documentation, and initiation of procedural improvements.
- Temporary procedure changes.
- Nuclear Quality Assurance assessment activities.
- In-House Event Investigation Program.
- Operating Experience Assessment Program.
- Vendor Manual Program.
- Procedure change tracking and trending process.

Line organizations that have responsibility for procedures or procedure categories will perform biennial self-assessments of the appropriate components that comprise the procedural development program in accordance with established guidelines. These self-assessments will provide a high degree of confidence that the programs and processes identified above are effective in maintaining procedures current. In addition, the Nuclear Quality Assurance (NQA) organization will assess the programs and processes identified above as part of the NQA assessment function that includes audits and surveillances.