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February 8, 1985
OAC-85-018

Dr. Thomas E. Murley, Administrator
Region I, Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

Docket Nos. 50-277
50-278
EA No. 84-39

Subject: Appraisal of Plant System Operating Procedures

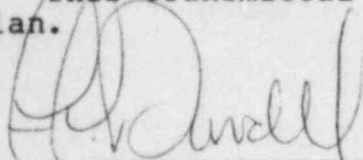
Dear Dr. Murley:

By the NRC Order dated June 18, 1984, the Philadelphia Electric Company was directed to submit a plan for conducting an appraisal of the licensee's Plant and System Operating Procedures. The Appraisal Plan was submitted as Attachment B to the Philadelphia Electric Company letter dated August 16, 1984. The Appraisal Plan was approved by the Nuclear Regulatory Commission in early September 1984.

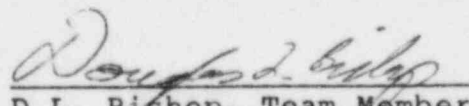
In accordance with Mr. S.L. Daltroff's letter of September 7, 1984 it was agreed between the Philadelphia Electric Company and the Nuclear Regulatory Commission that at the completion of the screening phase of the subject appraisal an interim report would be forwarded to the Nuclear Regulatory Commission. The Screening Phase was completed on February 9, 1985, approximately one (1) month before the scheduled completion date. The Screening Phase Interim Status Report is attached.

Simultaneous with this transmission, a copy of this letter and its enclosure is forwarded to Mr. George A. Hunger, Nuclear Safety Section of the Philadelphia Electric Company. Mr. Hunger was designated as the liason between the Philadelphia Electric Company and the project Appraisal Team. Mr. Hunger and his staff assisted the Appraisal Team by arranging for documents to be available for record examination during the Screening Phase.

This transmittal completes the Screening Phase of the Appraisal Plan.



F.C. Duvall, Team Member



D.L. Bishop, Team Member

FCD:alr

Enclosure: Screening Phase Interim Status Report.

cc: Mr. George A. Hunger

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SCREENING PHASE
INTERIM STATUS REPORT

INTRODUCTION

This Interim Report documents the completion of the Screening Phase of the "Appraisal Plan for the Review of Peach Bottom Atomic Power Station's Plant and System Operating Procedures" as submitted by the Philadelphia Electric Company on August 15, 1984. The Appraisal Plan was in response to your Order Modifying License Effective Immediately, dated June 18, 1984. As agreed between Mr. Richard Starostecki of the Nuclear Regulatory Commission and Mr. Shields L. Daltroff, Vice President, Electric Production, Philadelphia Electric Company, an Interim Status Report is to be submitted at the completion of the Screening Phase. The projected completion date of the Screening Phase was to be March 4, 1985. The Screening Phase was completed on February 9, 1985.

METHODOLOGY

The work performed during the Screening Phase consisted of examining the Peach Bottom Technical Specifications and FSAR to identify items which established the actions, setpoints, limits, cautions, sequences, and parameters necessary for safe operation. Each such item was labelled a Procedure Presentation Item (PPI). The Technical Specifications and the following sections of the Peach Bottom Atomic Power Station updated Final Safety Analysis Report were examined.

SCREENING PHASE INTERIM
STATUS REPORT (continued)

METHODOLOGY (continued)

<u>Section</u>	<u>Subject</u>
3.0	Reactor
4.0	Reactor Coolant
5.0	Containment
6.0	Core Standby Cooling System
7.0	Control & Instrumentation
8.0	Electric Power
9.0	Radioactive Waste Systems
10.0	Auxiliary Systems
11.0	Power Conversion
12.0	Structures & Shielding
13.0	Conduct of Operations
14.0	Plant Safety Analysis
Appex. A	Pressure Integrity
Appex. F	Interaction of Units 2 & 3
Appex. G	Plant Nuclear Safety
Appex. M	Containment Report
Appex. O	Emergency Plan/Security Plan
Appex. P	Environmental Tech. Specs.

SCREENING PHASE INTERIM
STATUS REPORT (continued)

METHODOLOGY (continued)

The Screening Phase was conducted in two (2) steps, Initial Screening and Secondary Screening. Initial Screening was performed by Appraisal Team members searching the Peach Bottom Technical Specifications and FSAR for Procedure Presentation Items. The criteria for Procedure Presentation Items were set forth in the Appraisal Plan submitted by Philadelphia Electric Company on August 15, 1984. To ensure completeness of the Screening Phase, a secondary screening of the Peach Bottom Safety Analysis Report was performed by computer search of the Philadelphia Electric Company FSAR database. Using the key word list developed by the initial screeners, the FSAR database was searched electronically for applicable occurrences of the key words. The Procedure Presentation Items thus located were then added to those generated during initial screening.

RESULTS

The initial and secondary screening efforts yeilded a total of one thousand four hundred and seventy (1,470) Procedure Presentation Items.

SCREENING PHASE INTERIM
STATUS REPORT (continued)

DISPOSITION

To prepare for the Evaluation Phase the Procedure Presentation Items were tabulated by Peach Bottom system identification and entered into the Operations Analysis Corporation computer to generate the Requirement Screening List. During the Evaluation Phase of the Appraisal the Requirement Screening List will be the basis for ascertaining whether the Procedure Presentation Items are included in the Peach Bottom Operating and System Procedures.