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M. J. COONEY
MANAGER

NUCLEAR PRODUCTION
ELECTRIC PRODUCTION DEPARTMENT

May 8, 1985

Docket No. 50-352

Inspection Report No. 50-352/85-03

Mr. Richard W. Starostecki
Division of Project & Resident Programs
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Starostecki:

Your letter dated April 2, 1985 forwarded Inspection Report 50-352/85-03. Appendix C of your letter addresses several items which are characterized as weaknesses related to the effectiveness of the licensee's programs, activities, or organizations. These items are restated below along with our response.

Program Weaknesses

- A. Plant Operational Review Committee (PORC) Subcommittees are permitted to review certain procedures without subsequent full PORC review of the results of the detailed review.

Response:

Administrative Procedure A-4, "Plant Operations Review Committee Procedure" has been revised to describe the mechanisms associated with PORC review of Subcommittee activities. This revision modified the PORC Approval Form to provide for a specific individual associated with the subcommittee activity to be assigned the responsibility of reporting to PORC. This mechanism provides for PORC discussion of subcommittee activities

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and will assure that PORC is fully cognizant of these subcommittee activities.

- B. Access to the control room is not effectively controlled.

Response:

As a result of control room access concerns, the following actions have been taken: (1) access to the control room has been restricted via the security computer to individuals with specific needs and through the use of the east door only, (2) the control room floor was marked to specify activity/traffic areas, and stanchions with ropes were provided, (3) signs are utilized to notify personnel when shift turnover meetings are in progress, and (4) the authority and responsibility of Shift Supervision to order the departure of unnecessary personnel from the Control Room was re-emphasized.

- C. The Temporary Procedure Change Process is cumbersome and prone to errors as indicated by changes missing from surveillance procedures and valve checkoff lists.

Response:

Based on a review of the errors described in the inspection report, it is felt that the errors did not identify a significant safety concern. However, as a result of the expressed concern, plant personnel will be cognizant of TPC process problems and will initiate appropriate changes, if necessary, to provide for enhanced, less cumbersome controls.

- D. In many cases, there is no formal documented review of completed surveillance test data by the responsible department supervision. In addition, there have been excessive time delays in processing some chemistry surveillance data.

Response:

The intent of the review of test results as specified in Administrative Procedure A-43 is to document the review of test results by individuals directly concerned with the results of the test, e.g., the Shift Technical Advisor or Shift Supervision. This mechanism assures that shift personnel are fully aware of the status of plant equipment. Although no formalized documented review is required by A-43, the majority of test results are reviewed by group supervisors responsible for the test or their designated alternates to assist in identifying problem areas.

Recent review of the status of chemistry test results determined that the backlog of data awaiting supervisor review has been substantially reduced. This backlog was the result of an administrative restraint which required that test results data be entered into the computer system prior to ST sign-off. These controls will be modified to provide for documentation of the review of test results in an expeditious manner. Completion of training of chemistry personnel in computer data entry is required to completely eliminate the ST backlog. This training is scheduled for completion by July 1, 1985.

- E. The maintenance program does not provide summary data for management overview of work backlog, preventive maintenance program completion status, or trends.

Response:

Periodic issuance of a Maintenance Management Report to station management has been initiated. This report provides management with maintenance status, trends, work backlogs, and priority of corrective and preventative maintenance requests in order to evaluate program effectiveness.

- F. Environmental Qualification Reports and corresponding revisions are poorly controlled.

Response

PECo Engineering and Research Department organizations have issued procedures for the control of Environmental Qualification Reports (EQRs) for mechanical equipment and electrical equipment. These procedures require the specific organization to (1) maintain registers of EQR holders and (2) issue revisions to the EQR to registered holders. A controlled copy of mechanical and electrical EQR's is available on site.

- G. The Valve Checkoff List for the Automatic Depressurization System was not completed prior to initial unit startup.

Response:

Plant procedure GP-2 (Normal Plant Startup) has been revised (Rev. 4 dated 2/14/85) to address the performance of the Check Off List for the Automatic Depressurization System as a prerequisite for plant startup.

- H. More than three hours were required for the inspection team to obtain unescorted access to the facility rather than the one hour requested by NRC Region I.

Response:

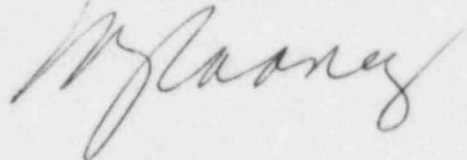
Steps are being taken to provide for more expeditious access processing of NRC personnel. These steps include the issuance of a security instruction addressing security aspects of site entry (issued 4/17/85). This guidance, in conjunction with the development of a new abbreviated site specific training program for NRC personnel, should permit granting unescorted access to the plant within the one-hour period requested by the NRC.

Mr. Richard W. Starostecki

May 8, 1985
Page 5

Should you have any questions or require further information, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in cursive script, appearing to read "M. J. T. Wiggins".

cc: Dr. T. E. Murley, Administrator, Region I
Mr. J. T. Wiggins, Resident Site Inspector
See Attached Service List

cc: Judge Helen F. Hoyt
Judge Jerry Harbour
Judge Richard F. Cole
Troy B. Conner, Jr., Esq.
Ann P. Hodgdon, Esq.
Mr. Frank R. Romano
Mr. Robert L. Anthony
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Charles W. Elliott, Esq.
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Angus Love, Esq.
David Wersan, Esq.
Robert J. Sugarman, Esq.
Martha W. Bush, Esq.
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Jay M. Gutierrez, Esq.
Atomic Safety & Licensing Appeal Board
Atomic Safety & Licensing Board Panel
Docket & Service Section (3 Copies)
James Wiggins
Timothy R. S. Campbell

January 16, 1985