

Operations Analysis Corporation

2401 Research Boulevard
Rockville, Maryland 20850

301/977-5550

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

May 1, 1985

OAC-85-062

*Independent
PECO Evaluation of
procedures involved 3 phases:
1. Screening (completed 2/9/85)
2. Evaluation
3. Detailed Review*

*This interim report provides
details of results of
evaluation phase completed
4/30/85*

*Detailed review phase ongoing,
scheduled for completion in
Sept. 85, after which Final
Report is to
be submitted*

Docket Nos. 50-277

50-278

EA No. 84-39

*For your info
+ DRP review*

Subject: Appraisal of Plant and System Operating Procedures

Dear Dr. Murley:

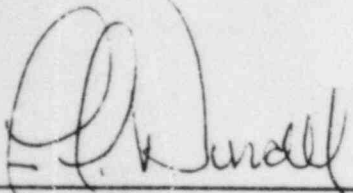
By the NRC Order dated June 18, 1984, the Philadelphia Electric Company was directed to submit a plan for conducting an appraisal of the licensee's plant and system operating procedures. The Appraisal Plan was submitted as Attachment B to the Philadelphia Electric Company letter dated August 16, 1984.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

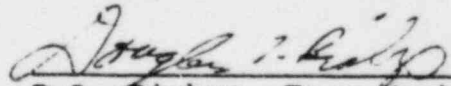
In accordance with Mr. S.L. Daltroff's letter of September 7, 1984 it was agreed between the Philadelphia Electric Company and the Nuclear Regulatory Commission that at the completion of the Evaluation Phase of the subject appraisal an interim report would be forwarded to the Nuclear Regulatory Commission. The Evaluation Phase was completed on April 30, 1985. The Evaluation 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 liaison 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 the examination of plant and system operating procedures during the Evaluation Phase.

This transmittal completes the Evaluation Phase of the Appraisal Plan.

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PDR ADDCK 05000277
Q PDR


F.C. Duvall, Team Member


D.L. Bishop, Team Member

FCD:alr

Enclosure: Evaluation Phase Interim Report

cc: Mr. George A. Hunger

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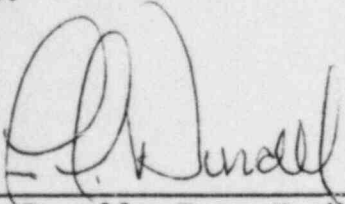
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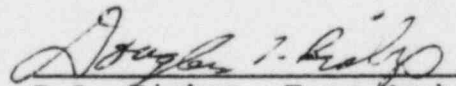
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F.C. Duvall, Team Member



D.L. Bishop, Team Member

FCD:alr

Enclosure: Evaluation Phase Interim Report
cc: Mr. George A. Hunger

EVALUATION PHASE
INTERIM STATUS REPORT

INTRODUCTION

This Interim Report documents the completion of the Evaluation 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 Licence 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 Evaluation Phase. The projected completion date of the Evaluation Phase was to be May 4, 1985. The Evaluation Phase was completed on April 30, 1985.

The Screening Phase of the Appraisal was completed on February 8, 1985 and an Interim Report was submitted by Operations Analysis Corporation letter OAC-85-018, dated February 8, 1985.

METHODOLOGY

The work performed during the Screening Phase consisted of examining the Peach Bottom Technical Specification 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 Screening Phase efforts yielded a total of one thousand four hundred and seventy (1,470) Procedure Presentation Items. The Procedure Presentation Items comprise the Requirements List (formerly called the Requirement Screening List) database.

The Evaluation Phase consisted of searching the Peach Bottom plant and system operating procedures to determine whether the Procedure Presentation Items were actually "included in" appropriate procedures. Each Procedure Presentation Item located in the plant and system operating procedures was entered on the Requirements List. If a Procedure Presentation Item was located in multiple station procedures, all of the procedures were entered into the database.

During the course of the Evaluation Phase one deviation was found. (A deviation is an instance in which a Procedure Presentation Item is incorrectly or improperly incorporated into a procedure.) The deviation involved the torus water level lower limit. The Technical Specification value is 14.6 feet. In eight (8) procedure usages the correct value was used. In one (1) procedure (Procedure COL GP-2A, Revision 5, "Reactor Startup Order") an incorrect value of 14.5 feet was given.

METHODOLOGY (continued)

Procedure COL GP-2A was promptly changed, then reviewed. Approval of the change was recommended by the Peach Bottom Plant Operating Review Committee within one (1) hour of the Operations Analysis Corporation notification of the deviation. The deviation was subsequently found in two (2) other procedures. These procedures were COL GP-2A SINGLE LOOP, Revision 0, "Reactor Startup Order - Single Loop Operation" and ST 10.4, Revision 13, "Relief Valve Manual Actuation". These procedures were immediately corrected in the same manner. Note: The Technical Specification lower limit on torus volume is expressed in terms of cubic feet rather than water level in feet. To ensure accuracy, a secondary calculation of torus volume versus torus water level was conducted by Operations Analysis Corporation. This analysis verified the correspondence of the torus low volume limit (in cubic feet) with the low level limit (in feet of water) as now correctly expressed in all of the Peach Bottom procedures.

REQUIREMENTS LIST DATABASE ADJUSTMENTS

The Requirements List continued to be adjusted by Operations Analysis Corporation personnel during the Evaluation Phase. The following adjustments occurred: Three (3) Procedure Presentation Items were eliminated. Twenty-seven (27) Procedure Presentation Items were deleted when scrutiny confirmed that they did not meet the criteria of the Appraisal. Thirty-five (35) of the Procedure Presentation Items added during the Screening Phase as the result of Technical Specification Revision 102/104 were deleted from consideration in this appraisal. It was determined during the Evaluation Phase that these Procedure Presentation items did not meet the Appraisal Plan Criteria and are not related to plant or System Operating Procedures.

RESULTS

Of the one thousand four hundred and seventy (1,470) Procedure Presentation Items identified during the Screening Phase, sixty-five (65) were eliminated from the database during the Evaluation Phase. The Evaluation Phase concluded with one thousand four hundred and five (1,405) Procedure Presentation Items. During the Evaluation Phase eighty-nine (89%) percent, or one thousand two hundred and forty-five (1,245) Procedure Presentation Items were confirmed to be correctly "included in" appropriate plant and system operating procedures.

Due to the large number of Procedure Presentation Items and voluminous number of procedures identified in the Appraisal Plan, the Evaluation Phase is regarded as a "rough cut" for confirming the location of Procedure Presentation Items. The remaining Procedure Presentation Items are addressed during the Detailed Review Phase.

The Detailed Review Phase is the thorough search of plant and system operating procedures to determine if the remaining one hundred and sixty (160) Procedure Presentation Items are "included in" the procedures. The Detailed Review Phase is currently in progress. The results of the Detailed Review Phase will be provided in the Final Report that is to be submitted to the Nuclear Regulatory Commission and the Philadelphia Electric Company by Operations Analysis Corporation in September 1985.