



PECO NUCLEAR

A UNIT OF PECO ENERGY

Drew B. Fethers
Vice President
Station Support

10CFR50.71(e)(4)

10CFR50.54(a)(3)

PECO Energy Company
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January 31, 1997

Docket Nos. 50-352
50-353

License Nos. NPF-39
NPF-85

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

SUBJECT: Limerick Generating Station, Units 1 and 2
Submittal of Revision 6 of the
Updated Final Safety Analysis Report

Dear Sirs:

In accordance with 10CFR50.71(e)(4) and 10CFR50.4(b)(6), this letter submits one (1) original and ten (10) copies of Revision 6 of the Updated Final Safety Analysis Report (UFSAR) for Limerick Generating Station (LGS), Units 1 and 2. The enclosed copies of Revision 6 are being provided to the NRC on a replacement page basis with a list of effective pages identifying the latest revision date of all current pages in accordance with 10CFR50.71(e)(1). In each revision package, we have also provided page replacement instructions for incorporating Revision 6 page changes into the LGS UFSAR. As required by 10CFR50.71(e)(5), each replacement page includes a bold vertical line in the margin adjacent to each area changed and the date of change is included on each page. Revision 6 reflects changes made up to a maximum of six months prior to this submittal in accordance with the requirements of 10CFR50.71(e)(4). As a result, the UFSAR Revision 6 package, has been made to reflect changes made to LGS, Units 1 and 2, under the provision of 10CFR50.59, at least up to July 31, 1996.

The enclosed UFSAR Revision 6 also contains the annual revision of the Quality Assurance (QA) Program Description which is being submitted in accordance with 10CFR50.54(a)(3). The updated QA Program Description (i.e., Section 17.2 of the UFSAR Revision 6) reflects editorial and organizational changes and those changes described in Attachment 1 as required by 10CFR50.54(a)(3)(ii) since the previous submittal. Based on the information provided in Attachment 1, we have concluded that the QA Program Description changes included in Revision 6 of the UFSAR do not reduce the commitments in the QA Program Description previously accepted by the NRC.

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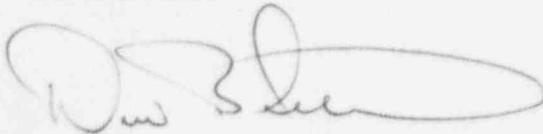
January 31, 1997

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As required by 10CFR50.71(e)(2)(i), I certify that to the best of my knowledge, Revision 6 of the UFSAR accurately reflects information and analyses submitted to the NRC, or prepared pursuant to NRC requirements as described above. In addition, as required by 10CFR50.71(e)(2)(ii), Attachment 2 to this letter identifies changes made under the provision of 10CFR50.59, and included in the enclosed Revision 6, but not previously submitted to the NRC.

If you have any questions or require further information, please contact us.

Very truly yours,

A handwritten signature in dark ink, appearing to read "N. S. Perry", with a large, sweeping loop at the end.

Enclosure
Attachments

cc: H. J. Miller, Administrator, Region I, USNRC (w/attachments and enclosure)
N. S. Perry, USNRC Senior Resident Inspector, LGS (w/attachments and enclosure)

ATTACHMENT 1

PECO Nuclear QA Program Description Changes LGS UFSAR, Revision 6

<u>Paragraph No.</u>	<u>Description of Change</u>	<u>Change Classification</u>
1. Table of Contents List of Figures 17.2 17.2.2.2 17.2.2.3 17.2.2.8 17.2.3.8.i 17.2.4.1.a 17.2.4.1.b 17.2.4.1.d 17.2.7.6 17.2.9.2 17.2.9.4 17.2.9.4.1 17.2.9.7 17.2.15.2 17.2.15.2.2 17.2.15.8 17.2.15.10 17.2.17.4 17.2.17.5 17.2.17.6 Appendix 17.2.II Figure 17.2.4	Changed "PECO Energy" to "PECO Nuclear."	Organizational
2. List of Figures 17.2 17.2.1 17.2.1.1 17.2.1.2 17.2.1.3 17.2.2.7 17.2.2.8 17.2.2.8.1 17.2.9.3 Appendix 17.2.I Figure 17.2.1 Figure 17.2.2	Changed "Nuclear Generation Group" to "PECO Nuclear" because of organizational name change.	Organizational

	<u>Paragraph No.</u>	<u>Description of Change</u>	<u>Change Classification</u>
3.	17.2.1.1 17.2.1.2 17.2.1.2.3 17.2.1.2.3.h 17.2.1.2.3.2.1.d 17.2.1.2.3.2.3 17.2.1.2.5.6 17.2.1.2.5.11 17.2.1.2.5.12 17.2.2.8 17.2.16.4.3 17.2.18.6 17.2.18.6.k Appendix 17.2.II Figure 17.2.1 Figure 17.2.2	Changed "Senior Vice President and Chief Nuclear Officer" to "President of PECO Nuclear and Chief Nuclear Officer" because of a change in position title and organizational restructuring.	Organizational
4.	17.2 17.2.1.1 17.2.1.2.3.i 17.2.1.2.5.6 17.2.2.1	Changed "Quality Assurance Program" to "QA Program" and "Quality Assurance Program Description" to "QA Program Description" for consistent word usage throughout the QAPD.	Editorial
5.	17.2.2.3 17.2.2.8 17.2.2.11 17.2.4.2 17.2.7.1.b.3	Capitalized "Program" in "QA Program" when referring to PECO's QA Program.	Editorial
6.	List of Figures	For Figures 17.2-3 and 17.2-5 through 17.2-10, deleted the titles of the organization charts that are no longer provided with the QAPD. For Fig. 17.2.7, replace the entry "INTENTIONALLY LEFT BLANK" with "Deleted." For Figure 17.2.2, replaced the title of "Organization Chart, Nuclear Generation Group, PECO Energy Company" with "Organization Chart, PECO Nuclear, a Unit of PECO Energy Company." Changes made for consistency with PBAPS QAPD.	Editorial Organizational
7.	17.2.1.1 17.2.1.2.5.11 Figure 17.2.1 Figure 17.2.2	Changed title of PECO Energy's "Chairman of the Board and Chief Executive Officer" to "Chairman of the Board." Changed title of PECO Energy's "President and Chief Operating Officer" to "President and Chief Executive Officer." Changed "Office of the Chief Executive" to Office of the Chairman/Chief Executive Officer." Changes made to reflect current organizational titles.	Organizational

	<u>Paragraph No.</u>	<u>Description of Change</u>	<u>Change Classification</u>
8.	17.2	<p>Added the following two sentences after the first sentence: "PECO Energy is the licensee and retains full responsibility for all LGS activities. PECO Nuclear, a Unit of PECO Energy, is assigned responsibility for execution of LGS activities, including maintenance and implementation of the QA Program." These sentences are added to clarify that PECO Energy remains the licensee, and to introduce within the QAPD the role and authority of PECO Nuclear.</p> <p>In the sentence following the added two sentences discussed above, changed "President" to "President and Chief Executive Officer" to match the organizational position equivalent to the position that which issued the policy statement.</p> <p>For fifth paragraph, clarified that reference to Section 13.5 is to Section 13.5 of the UFSAR.</p> <p>For seventh paragraph of 17.2, revised end of first sentence from "described in Section 17.2" to "described in this Section 17.2" to help the reader understand that this is a self-reference.</p>	Clarification
9.	17.2.1	<p>Deleted the sentence which provided a count of the organizations within PECO Energy and the number of Senior VPs and VPs. The referenced Organization Chart better describes the PECO Energy organizational structure than the deleted sentence. Also reworded third sentence which identifies the PECO Energy organizations that are not part of PECO Nuclear but which support PECO Nuclear (PECON).</p>	Editorial
10.	17.2.1.2	<p>Revised first paragraph by combining the two sentences into one for readability purposes. Also revised the end of the sentence from "establishment of the QA Program goals, and objectives" to "establishment of the QA Program, goals, and objectives" to correct the misspelling.</p> <p>Added a paragraph discussing the new position of Senior Vice President, Nuclear Operations, to the organizational description.</p> <p>Closed this new paragraph with the sentence "The reporting relationships of PECO Nuclear are shown on the Figure 17.2-2 organization chart."</p> <p>Deleted first sentence of third paragraph which stated that "The organization of the Nuclear Generation Group is shown in Figure 17.2-2." since it would have been redundant with the newly added sentence above it.</p> <p>Edited last sentence of third paragraph to more broadly describe the types of support provided by contractors and non-PECON organizations.</p>	Organizational Editorial
11.	17.2.1.2.1	<p>Revised beginning of sentence from "The LGS organization, duties, and" to "The LGS operating organization, duties, and" to be consistent with the wording of referenced UFSAR Section 13.1.2.</p>	Editorial
12.	17.2.1.2.2	<p>Revised the former cross reference to UFSAR "Section 13" to "Section 13.1.1" so that the precision of this cross reference is consistent with that in the preceding paragraph 17.2.1.2.1.</p>	Editorial

	<u>Paragraph No.</u>	<u>Description of Change</u>	<u>Change Classification</u>
13.	17.2.1.2.3 17.2.1.2.3.1 17.2.1.2.3.1.1 17.2.1.2.3.1.2 17.2.1.2.5.9	Removed the period at the end of each clause in each list of responsibilities.	Editorial
14.	17.2.1.2.3	At the end of the second paragraph, deleted the words "and the Peach Bottom and Limerick Independent Technical Review Programs" because the former ISEGs are no longer separate organizational units. At the end of the third paragraph replaced the colon with a period.	Organizational Editorial
15.	17.2.1.2.3.a	Revised beginning of the sentence from "establish Nuclear Quality Assurance policy" to "establish Quality Assurance policy" for consistency in terminology. Also, for the list of functional areas, removed the capitalization on all the generic terms.	Editorial
16.	17.2.1.2.3.e	Changed the entry from "Require tracking and verification of corrective action and problem resolution for all QA-identified Corrective Action Requests (level 2 and 3 issues)" to "Require tracking and verification of corrective action and problem resolution for NQA-identified level 2 and 3 PEP issues." Also deleted the last sentence which was specific to tracking of deviations (DEVs). Changes made to be consistent with the terminology used by implementing procedures and to allow the terms CAR and DEV to be discontinued for NQA-identified, level 3 PEP issues. The processing requirements for NQA-identified PEP issues are not changed by discontinuing use of the terms CAR and DEV.	Editorial
17.	17.2.1.2.3.f	Enclosed the sentence following the clause in parenthesis.	Editorial
18.	17.2.1.2.3.h	Removed the apostrophe from "of Limerick Generation Station's operations."	Editorial
19.	17.2.1.2.3.m	Deleted the words "of quality and evaluated suppliers" which did not add anything to the term "Evaluated Vendors List."	Editorial
20.	17.2.1.2.3.n	Changed the clause "Perform assessment/surveillance of vendor activities as appropriate" to "Assure assessment/surveillance of vendor activities is performed as appropriate" in order to better reflect the actual responsibility of the Director, NQA.	Editorial
21.	17.2.1.2.3.1	Broke the former introductory paragraph into two paragraphs. The first paragraph discusses the organizational constituents of the division. The second paragraph discusses the reporting relationship between the Manager, Limerick Quality Division, and the Director, NQA; the qualification requirements of the Manager; and the introductory sentence to the list of responsibilities of the Manager.	Editorial

	<u>Paragraph No.</u>	<u>Description of Change</u>	<u>Change Classification</u>
22.	17.2.1.2.3.1.g	Revised the words "adequacy of the nuclear facility QA Program" to "adequacy of the QA Program" for consistency in terminology and consistency with the PBAPS QAPD.	Editorial
23.	17.2.1.2.3.1.h	Capitalized the word "Directives" in the term "Stop Work Directives" to recognize that the Stop Work Directive is a defined form by the implementing procedures.	Editorial
24.	17.2.1.2.3.1.i	Removed the capitalization from the words "personnel qualification records" because these words are generic.	Editorial
25.	17.2.1.2.3.1.1	At the end of the second sentence, replaced the colon with a period.	Editorial
26.	17.2.1.2.3.1.1.i	Revised the entry from "Development and approval of Surveillance Guidelines" to "Assure development of and approve Surveillance Guidelines" to better describe the Manager's responsibility and to make this entry agree with the structure of the other entries in this list of responsibilities.	Editorial
27.	17.2.1.2.3.1.2	Changed the title "Superintendent" to "Supervisor" because the position title has changed. Also, at the end of the second sentence, replaced the colon with a period.	Organizational Editorial
28.	17.2.1.2.3.1.2.b	Revised the entry from "Oversee the verification activities in the areas of maintenance and modification activities performed on safety-related equipment" to "Oversee verification activities in the areas of maintenance and modifications performed on safety-related equipment."	Editorial
29.	17.2.1.2.3.1.2.d	Changed the word "Overview" to "Oversight" in order to use the correct word.	Editorial
30.	17.2.1.2.3.1.2.f	Changed "Quality Verification" to "QV" for consistent use of the abbreviation.	Editorial
31.	17.2.1.2.3.2	Deleted the sentence following the header because it did not add anything to the text that follows.	Editorial
32.	17.2.1.2.3.2.1	Replaced the colon at the end of the introductory clause with the words "the following," and removed semicolons at the ends of subitems a, b, and c.	Editorial
33.	17.2.1.2.3.2.1.a	Changed "NRC issuances, industry advisories, Licensee Event Reports, and other sources that may indicate areas for improving plant safety" to "Review of NRC issues, industry advisories, Licensee Event Reports, and other sources for the purpose of identifying potential areas for improving plant safety." Change made to more clearly identify the intended action.	Clarification Editorial

	<u>Paragraph No.</u>	<u>Description of Change</u>	<u>Change Classification</u>
34.	17.2.1.2.3.2.1.b	Changed "Internal and external operating experience information that may indicate areas for improving plant safety" to "Review of internal and external operating experience information for the purpose of identifying potential areas for improving plant safety." Change made to more clearly identify the intended action.	Clarification Editorial
35.	17.2.1.2.3.2.1.c	Added the words "Review of" before the existing entry in order to more clearly identify the intended action. Also made the word "surveillance" plural.	Clarification Editorial
36.	17.2.1.2.3.3	Broke the former introductory paragraph into two paragraphs. The first paragraph identifies that the division consists of the Assessment Section. The second paragraph discusses the reporting relationship between the Manager, CNQ, and the Director, NQA; states that the Manager is responsible for all CNQ activities; and concludes with an introductory sentence to the list of the Manager's responsibilities.	Editorial
37.	17.2.1.2.3.3.a	Revised the entry "Manuals and procedures" to read "Preparation, revision, and maintenance of NQA manuals and procedures" for clarification purposes.	Clarification Editorial
38.	17.2.1.2.3.3.d	Revised the entry "Oversight of the quality activities of Nuclear Support" to "Conducting internal assessments and surveillances of Station Support Department's quality-related activities" to accommodate organizational name change and for consistency with subitem "g."	Organizational Editorial
39.	17.2.1.2.3.3.g	Revised the entry "Conducting internal assessments and surveillances at the corporate offices" to "Conducting internal assessments and surveillances of QA Program activities performed by PECO Energy organizations other than PECO Nuclear." Revised to better define the activities for which NQA provides oversight.	Clarification
40.	17.2.1.2.3.3.j	Removed the term "UFSAR" because the QA Program Description is already defined as this section of the UFSAR.	Editorial
41.	17.2.1.2.3.3.1	Replaced the colon at the end of the introductory clause with the words "the following."	Editorial
42.	17.2.1.2.3.3.1.c	Revised entry from "Providing the engineering programs overview and modifications interface" to "Oversight of engineering programs and design of modifications" for correct word usage and clarification.	Editorial
43.	17.2.1.2.5.1	In the last sentence of the paragraph, changed "The NRB shall be established" to "The NRB is established" in order to better reflect the current status of the NRB.	Editorial

	<u>Paragraph No.</u>	<u>Description of Change</u>	<u>Change Classification</u>
44.	17.2.1.2.5.5	Replaced the colon with a period. Replaced NSD (Nuclear Support Department) with SSD (Station Support Department) because of organizational name change.	Editorial Organizational
45.	17.2.1.2.5.6	In first sentence, removed the capitalization from the words "quality assurance" (generic use). In the second sentence, replaced the words "corporate Quality Assurance Program" with "QA Program Description contained herein." Also in the second sentence, replaced the words "have the corporate Quality Assurance organization available" with "have the NQA department available." These changes made to be consistent with PBAPS QAPD.	Editorial
46.	17.2.1.2.5.7	At the end of the last sentence, replaced the word "Board" with "NRB" in order to be consistent with the PBAPS QAPD.	Editorial
47.	17.2.1.2.5.7.1	This clause appeared twice. Deleted second occurrence.	Editorial
48.	17.2.1.2.5.9	Replaced "The NRB shall review:" with "The NRB, or its appointees, shall review the following." Also added a comma after the word "codes" in subitem "e."	Clarification ECR 96-04486 Editorial
49.	17.2.1.3	Deleted words "and Purchasing" at the end of the first paragraph as well as the entire last paragraph to accommodate organizational changes that relocated the purchasing function for PBAPS from the former Purchasing Division of the Support Services Department to the Station and Station Support organizations. Responsibilities of the Station organization and the Station Support Department are provided by UFSAR Section 13.	Organizational Editorial
50.	17.2.1.4	Deleted sentence "The Claims - Security Division is the only organization in the Legal Department that is involved in nuclear plant activities." because the Legal Department assists PECON on various issues.	Clarification
51.	17.2.2.1	In the first paragraph, last line, added a comma after the word "important."	Editorial
52.	17.2.2.1.1	Split former second paragraph into four paragraphs to be consistent with the PBAPS QAPD. Also revised the sentence beginning with "An overview of the QA Program" to read "Oversight of PECO Nuclear's implementation of the QA Program" to correct the word choice and to be consistent with the PBAPS QAPD.	Editorial

Paragraph No.	Description of Change	Change Classification
53. 17.2.2.3	<p>In second sentence, added a comma after the word "formalized." In the second paragraph, changed the last three sentences of this paragraph from "Training aids and individual study periods shall be utilized, as appropriate. Formal classroom instruction shall be scheduled. Evaluation of trainees' progress shall be documented." to "Training aids and materials are utilized. Formal classroom and individual study periods are scheduled. Evaluation of trainees' progress is documented." Changes made to be consistent with the PBAPS QAPD.</p> <p>In the third paragraph, second sentence, capitalized the terms General Employee Training, Emergency Plan, Fire Protection Program, and Security Plan because these terms identify specific PECON programs. Also removed the colon after the word "includes."</p> <p>In the third paragraph, third sentence, replaced the words "shall be trained" to "are trained" to be consistent with the status of the training activity and to be consistent with the PBAPS QAPD.</p> <p>In the third paragraph, sixth sentence, replaced the words "procedures shall delineate" with "procedures delineate."</p>	Editorial
54. 17.2.2.6	<p>Broke the former first paragraph into two paragraphs. The first paragraph discusses the Maintenance organization and the reporting relationship between the Director, Maintenance, and the LGS Vice President. The new second paragraph discusses NQA's quality verification role.</p> <p>In the third paragraph, replaced the words "have had specific quality training" with "have specific quality training."</p>	Editorial
55. 17.2.2.7	<p>In the third sentence, replaced the words "in accordance with Materials Management, Corporate, NQA, and plant procedures" with "in accordance with PECO Nuclear procedures" to be consistent with PECON's use of Common Nuclear Procedures for these procurement activities.</p> <p>In the fourth sentence, clarified that it is plant items or services that are to be purchased through Supply Management. Non-plant items such as office supplies need not be purchased through Supply Management.</p> <p>Last sentence of paragraph is reworded to clarify that a vendor organization may be authorized to purchase plant items and services in accordance with its procurement program, provided the vendor has been evaluated and accepted for this service.</p>	Clarification Editorial
56. 17.2.2.8	<p>In the first sentence, removed the comma after the word "objectives" and capitalized the words "Policies" and "Directives."</p> <p>In the second sentence, removed the colon after the phrase "in the areas of." Also added "I&C" to the list of areas and placed "surveillance inspection/testing" before "maintenance" for consistency with the PBAPS QAPD.</p>	Editorial

	<u>Paragraph No.</u>	<u>Description of Change</u>	<u>Change Classification</u>
57.	17.2.2.8, 2nd paragraph	Revised the second paragraph from "A matrix of procedures or documents is presented in Appendix 17.2.1 to demonstrate that 10CFR50, Appendix B criteria are fully implemented by documented procedures." to "A matrix of the administrative procedures versus the eighteen criteria of 10CFR50, Appendix B, is presented in Appendix 17.2.1 to demonstrate that Appendix B provisions are fully implemented by documented procedures." for consistency with the PBAPS QAPD.	Editorial
58.	17.2.2.8, 3rd paragraph	In the third paragraph, changed "QA Program shall require" to "QA Program requires" and "Radioactive shipments" to "Radioactive waste shipments" because 10CFR71, subpart H, deals with radwaste shipments.	Clarification Editorial
59.	17.2.2.8, 8th paragraph	In first sentence, replaced "reviewed periodically" with "reviewed on a continuing basis." In second sentence, replaced "The nuclear organization management" to "PECO Nuclear management." In the same sentence replaced "reports at Senior Vice President and Chief Nuclear Officer staff meetings" with "reports at staff meetings held by the President of PECO Nuclear and Chief Nuclear Officer." At the end of this sentence removed the capitalization from the words "inspections" and "audits." Changes made for consistency with the PBAPS QAPD.	Organizational Editorial
60.	17.2.2.10, 4th paragraph	Changed the entire paragraph from "Resolutions of differences of opinion between assessed and assessing personnel, regarding deficiencies or noncompliances identified by NQA shall be made by management. NQA management is authorized to stop work when such work is considered to be a serious quality degradation." to "Resolutions resulting from differences of opinion regarding deficiencies or noncompliances identified from assessments, surveillances, or verifications by NQA shall be made by management. NQA management is authorized to stop work when such work could result in a degradation of quality." Revised to be consistent with the PBAPS QAPD.	Editorial
61.	17.2.2.11	In first sentence, added "instructions" to the list of documents that make up the QA Program. In second paragraph, added "guidelines" to list of documents that pertain to quality-related activities. Changes made for consistency with the PBAPS QAPD.	Editorial
62.	17.2.2.13	Combined subitem "a" with the introductory clause to make a complete sentence. Also added "managing quality-related activities" as an activity for which personnel must be trained. Incorporated subitem "b," into a separate sentence as follows: "Personnel performing or verifying quality-related activities shall be trained and certified." Changes made to be consistent with PBAPS QAPD.	Editorial

	<u>Paragraph No.</u>	<u>Description of Change</u>	<u>Change Classification</u>
63.	17.2.2.16	<p>Removed the comma after "The Quality Division Manager" and added the word "plant" to "reviews plant operating characteristics." Also changed "NRC issuances" to "NRC issues."</p> <p>Provided the words that the acronym "PIMS" stands for and removed the word "database" following the parenthetical entry (PIMS). Changes made to be consistent with PBAPS QAPD.</p>	Editorial
64.	17.2.3.1	<p>In the first sentence, changed "Measures shall be established" to "Measures are established." In the second sentence, changed "The provisions shall identify" to "The provisions identify." Changes made to reflect the current status of the design control program; i.e., it has been established and is implemented.</p>	Editorial
65.	17.2.3.1.d	<p>Replaced the comma after "reactor physics" with a semicolon.</p>	Editorial
66.	17.2.3.3.1	<p>Revised the sentence that previously read "Instructions for the design of modifications shall be written to require compliance to regulatory requirements as defined in 10CFR50.59, and as defined in the license application, in accordance with the design basis of the structures, systems, or components." to "Controls for the design of modifications to structures, systems, or components that are safety related or augmented quality shall ensure that applicable regulatory requirements and the design basis, as defined by 10CFR50.2 and as specified in the license documents, are correctly translated into specifications, drawings, procedures, and instructions." Revision made to better reflect the requirements of the first sentence of 10CFR50, Appendix B, Criterion III, and to make better sense.</p>	<p>Clarification</p> <p>Editorial</p>
67.	17.2.3.4	<p>Replaced the first "shall be" with "is" and the second "shall be" with "are" to reflect the current status of the program.</p>	Editorial
68.	17.2.3.5	<p>Replaced "Measures shall be established" with "Measures are established" to reflect the current status of the program.</p>	Editorial
69.	17.2.3.6.1	<p>In the first sentence, replaced "adequacy of modifications shall be determined" with "adequacy of modifications is determined." In the third sentence, replaced "The reviews shall consist of" with "The reviews consist of."</p> <p>Both changes made to reflect the current status of the program.</p> <p>In the second paragraph, first sentence, clarified that the topic is design verification.</p> <p>In the second paragraph, second sentence, removed the word "those" from the phrase "except in those cases." In the sentence that follows, replaced "In those cases" with "In these cases." In the last sentence removed the word "the" from the introductory "In all cases, the design" and rephrased the end of the sentence from "the component, system, or structure to perform its function." to "the structure, system, or component to perform its safety function." Changes made to be consistent with the PBAPS QAPD.</p>	Editorial

	<u>Paragraph No.</u>	<u>Description of Change</u>	<u>Change Classification</u>
70.	17.2.3.6.2	Revised the beginning of the introductory sentence from "When the adequacy of design" to "When the adequacy of a design." Revised the end of the sentence from "to ensure that:" to "to ensure the following."	Editorial
71.	17.2.3.7	Added a comma after "commercial (off-the-shelf) items."	Editorial
72.	17.2.3.8.a	Replaced the closing colon with a period.	Editorial
73.	17.2.4.1	Removed the comma after "assure adequate quality." In the second paragraph, replaced the colon at the end of the introductory statement with the words "the following" and removed the period at the end of each clause in each list of responsibilities. Also enclosed the sentences following the clause in subitems "a" and "b" in parentheses. For subitem "d" replaced "for inspection and audit, and source inspection" with "for source inspection and audit."	Editorial
74.	17.2.4.4	Removed "the" from "including the procurement of" and "a" from "replacement parts as a part of."	Editorial
75.	17.2.4.5	For each of the three first sentences, reworded from "procedures shall require," "member shall determine," and "member shall also determine" to "procedures require," "member determines," and "member also determines." In the first sentence changed the words "a nuclear safety-related item" to "a safety-related item" in order to be consistent in terminology. In the third sentence added a comma after the words "special controls to be applied." Changed the end of the third sentence from "and documentation requirements" to "receipt controls, and QA documentation requirements" in order to clearly require that receipt inspection requirements be established during the preparation of procurement documents.	Clarification Editorial
76.	17.2.4.6	In the first sentence, deleted the word "clearly" because of its subjective nature and because without the word, the sentence states the same requirement. Combined the last two sentences into one by changing "Technical and quality assurance requirements are defined in procurement documents. These requirements are subjected to the design review process and are referenced in procurement documents." to "The procurement documents shall establish the technical and quality assurance requirements and they shall be verified as part of the design review process."	Editorial
77.	17.2.4.8.1	Reworded sentence from "Nuclear Generation Group Supply Management shall process only approved requisitions in accordance with PECO Energy Procurement procedures and policies." to "PECO Nuclear shall process procurement requisitions in accordance with approved procedures and policies." Revision made to accommodate the the Station's Materials Management organizations also process procurement requisitions.	Organizational Editorial

Paragraph No.	Description of Change	Change Classification
78. 17.2.4.8.2	Reworded entire paragraph from "Nuclear Generation Group Supply Management shall not alter the requisition of any nuclear safety-related item or service without prior approval of the requisitioning source, except for commercial items such as price, quantities, schedule, F.O.B. terms, etc. Prior approval is required from the responsible organization for cases where the requisitioning source is not the PECO Energy organization responsible for the technical and quality aspects of the item or service." to "The technical or quality assurance requirements established by a purchase requisition for any quality-related item shall not be altered without prior approval of the requisitioning source." Revision made to establish the prohibition across the entire PECON organization, not just Supply Management. Also reworded for clarity and consistency with the PBAPS QAPD.	Clarification Editorial
79. 17.2.4.9	Revised the beginning of the sentence from "Nuclear Engineering procurement documents" to "PECO Nuclear procurement documents" to broaden the requirement across the PECON organization. This revision is a result of the redistribution of engineering activities across multiple organizations.	Organizational
80. 17.2.5.2	Revised end of the second paragraph from "quality compliances" to "quality compliance."	Editorial
81. 17.2.5.3	Deleted entire sentence "The NQA Department shall review and approve NQA Procedures, including revisions." because it is redundant to the broader statements of 17.2.5.1, 17.2.5.9 (renumbered), and 17.2.6.4. As a result of the deletion, the steps previously numbered as 17.2.5.4 through 17.2.5.11 are now numbered as 17.2.5.3 to 17.2.5.10.	Editorial
82. 17.2.5.4 (new number)	Added "work request forms" and "databases" to the list of possible recording documents. Also changed the words "to assure compliance" to "to document compliance" to better describe the purpose of using recording documents.	Clarification Editorial
83. 17.2.5.3 (new number)	Revised the structure of the second sentence to eliminate the list structure. Revised the sentence to now read "The instructions include scope of work; engineering, design, procurement, and installation responsibilities; and special testing requirements."	Editorial

	<u>Paragraph No.</u>	<u>Description of Change</u>	<u>Change Classification</u>
84.	17.2.5.9 (new number)	Revised the entire paragraph from "Administrative procedures shall be written by other organizations participating in quality-related activities supporting operation of LGS under the QA Program. These procedures shall contain provisions which clearly delineate the sequence of actions for the conduct of safety-related activities." to "Organizations participating in LGS quality-related activities shall prepare and issue any procedural documents necessary to control their activities. These procedural documents shall contain provisions which clearly delineate the sequence of actions for the conduct of safety-related activities." Revised to preclude an interpretation that requires all administrative procedures be prepared by other organizations. Also broadened the scope of the statement to encompass all procedural documents, not just administrative procedures.	Clarification Editorial
85.	17.2.5.10 (new number)	Revised the statement to strengthen the qualification and independence requirements of SQRs and Quality Reviewers. Revised from "Administrative procedures pertaining to quality-related activities shall be reviewed by individuals within the responsible organization. This review shall be controlled by appropriate procedures." to "Administrative procedures pertaining to quality-related activities shall be reviewed by individuals qualified in QA Program requirements. An individual who reviews an administrative procedure shall not have prepared the procedure. These reviews shall be controlled by appropriate procedures." Revision made pursuant to NRC requirements established upon PECON request to transfer the activity of reviewing administrative procedures from NQA to the line organization. (Reference: ECR 96-02069)	Functional
86.	17.2.6.1	Changed first sentence from "Measures shall be established and documented to control the issuance of documents, such as instructions, procedures, and drawings, including changes thereto, which prescribe activities affecting quality." to "Measures are established through administrative procedures to control the issuance of documents such as instructions, procedures, and drawings, including changes thereto." Revision made to reflect the status of these measures; i.e., the measures are already in place.	Editorial
87.	17.2.6.1.1	Corrected the possessive pronoun in the second sentence from "its" to "their" to agree with the pronoun's antecedent, "organizations."	Editorial
88.	17.2.6.2	Revised the beginning of the first sentence from "Those participating in an activity shall be made aware of" to "Those participating in an activity are aware of" to reflect the status of this activity; i.e., indoctrination activities have already been implemented (and continue to be for new personnel).	Editorial
89.	17.2.6.3	Replaced the colon at the end of the introductory clause with the words "the following." and deleted the periods at the ends of the clauses in subitems "a" through "g."	Editorial

	<u>Paragraph No.</u>	<u>Description of Change</u>	<u>Change Classification</u>
90.	17.2.6.4	Revised the sentence from "The NQA Procedures and revisions thereto shall be controlled per NQA Procedures under the authority of the Director, NQA." to " NQA Procedures and revisions thereto are controlled and approved by the Director, NQA."	Editorial
91.	17.2.6.5	Revised the beginning of the first sentence from "LGS activity instructions, procedures, and drawings, shall be procedurally controlled and approved in accordance with the administrative procedures" to "LGS activity instructions, procedures, and drawings, are procedurally controlled and approved in accordance with administrative procedures" to reflect the status of this activity; i.e., these documents are already and continue to be controlled.	Editorial
92.	17.2.6.6	Changed the words "The control of documents shall apply" to "Document control applies."	Editorial
93.	17.2.7.1	Changed the colon at the end of the introductory sentence to a period.	Editorial
94.	17.2.7.1.b	Changed the colon at the end of the introductory sentence to a period and removed the periods at the ends of the clauses in subitems 1, 2, and 3. In clause b.2, changed the word "articles" to "items."	Editorial
95.	17.2.7.3	Changed first sentence from "Measures shall be established" to "Measures are established" to better reflect the status of QA program for control of purchased items and services. Also replaced the colon at the end of the second sentence with a period and removed the periods at the ends of the clauses for subitems "a" through "e."	Editorial
96.	17.2.7.7	Clarified that it is the purchase of safety-related items or services which is controlled. Removed the quotation marks enclosing "evaluated vendors", as well as the unnecessary capitalization of these words. Changed the word "alternate" to "designee." Revised the end of the sentence from "requirements to ensure the quality of the product" to "requirements necessary to assure the quality of the purchased product." for consistency with the wording of the PBAPS QAPD. Also added the following sentence: "NRC-licensed nuclear operating utilities are not maintained on the Evaluated Vendors List. The utility Quality Assurance Programs were deemed acceptable by the NRC as a function of the licensing process." to clarify that PECON does not evaluate the QA Program of currently licensed utilities when purchasing items from them.	Clarification Editorial

	<u>Paragraph No.</u>	<u>Description of Change</u>	<u>Change Classification</u>
97.	17.2.7.8	Revised the sentence from "Vendors that are on the "Evaluated Vendors List" are audited triennially by NQA commensurate with the importance, complexity, and quantity of the product or service being purchased." to "Vendors on the Evaluated Vendors List are assessed by NQA at least once every 3 years." Revision made to preclude possible confusion over the term "triennial." Also, the minimum frequency of NQA assessment is not impacted by the "importance, complexity, or quantity of product or services being purchased," therefore, these words were deleted from the end of the sentence.	Clarification Editorial
98.	17.2.8.1	Revised the beginning of the first sentence from "Measures shall be established" to "Measures are established" to reflect the status of this activity; i.e., the material control measures have been established and continue to be implemented. In the second sentence, added a comma after the word "repair" and deleted the words "Engineering Work Letter" because EWLs are no longer used.	Clarification Editorial
99.	17.2.8.3	Changed the words "shall be established" to "are established" to reflect the status of this activity. Changed the words "shall apply" to "apply." Deleted the word "and" after "(including shelf-life)." Added a comma after the word "installation."	Editorial
100.	17.2.8.4	Changed the words "shall be delineated" to "are delineated" to reflect the status of this activity. Also changed "materials" to "material" and "items" to "characteristics."	Editorial
101.	17.2.9.1	Changed the words "Measures shall be established" to "Measures are established" to reflect the status of this activity. Also removed the comma after the term "special processes."	Editorial
102.	17.2.9.4.1	Changed the beginning of the sentence from "Certification of welders performing activities under the QA Program shall be kept current" to "Certifications of welders are kept current" to delete unneeded words.	Editorial
103.	17.2.9.6	Changed the words "shall be written" to "are written" to reflect the status of this activity; i.e., the NDE procedures have been prepared, approved, and issued.	Editorial
104.	17.2.9.6.1	Added the words "and certified" after the words "be qualified" to clearly establish that NDE personnel require certification. Also changed the words at the beginning of the sentence from "NDE procedures shall require" to "NDE procedures require."	Clarification Editorial
105.	17.2.9.7	Deleted the second sentence invoking SNT-TC-1A because it is redundant to 17.2.9.6.1.	Editorial
106.	17.2.9.8	Removed the comma after the word "documented" in the second sentence.	Editorial

Paragraph No.	Description of Change	Change Classification
107. 17.2.10.1	In the first sentence changed the words "shall be established" to "is established" to reflect the status of this activity.	Editorial
108. 17.2.7.10.1	Replaced the colon at the end of the introductory clause with the words "provide for the following." and removed the periods at the ends of the clauses in subitems "a" through "g."	Editorial
109. 17.2.10.4	Revised the beginning of the sentence from "The verification programs for modifications" to "Quality Verifications (QVs) for modifications" to clarify that verifications performed by NQA for mods and nonroutine maintenance are called "Quality Verifications" (QVs) as discussed by administrative procedure A-C-33.	Clarification
		Editorial
110. 17.2.10.4.2	At the end of the sentence changed the words "with Nuclear Engineering Division approved requirements" to "with PECO Nuclear approved requirements" to allow for the use of both Common Nuclear Procedures and departmental procedures of other organizations participating in the mod process.	Clarification
111. 17.2.10.5	Changed the beginning of the sentence from "Verification personnel are responsible for assuring" to "Verification personnel assure."	Editorial
112. 17.2.10.7	Enclosed the words "and beyond which work shall not proceed" in parentheses and deleted the commas so as to aid readability.	Editorial
113. 17.2.10.8	Deleted the statement concerning stop work authority because it is redundant to paragraph 17.2.2.10. As a result of the deletion, the paragraphs that follow are renumbered.	Editorial
114. 17.2.10.8 (new number)	Changed the two sentences from "Personnel performing quality verifications shall be qualified in accordance with applicable industry standards and company training programs. Certification of inspector qualifications shall be maintained in accordance with procedures." to "Personnel performing verifications are qualified in accordance with applicable industry standards and company training programs. Certifications of inspector qualifications for QV personnel are maintained in accordance with procedures." Revised first sentence to broaden the requirement to be qualified to all personnel who perform verifications (not just NQA personnel). Revised the second sentence to clarify that it is NQA's QV personnel who require certification as inspectors.	Clarification
115. 17.2.10.8.1 (new number)	Revised the beginning of the sentence from "The code authorized inspector shall assure" to "The code authorized inspector assures" for consistency with the PBAPS QAPD.	Editorial
116. 17.2.10.9 (new number)	Reworded the term "systems, structures, and components" to "structures, systems, and components" for consistency.	Editorial

	<u>Paragraph No.</u>	<u>Description of Change</u>	<u>Change Classification</u>
117.	17.2.10.11 (new number)	Revised the second paragraph from "Procedures shall be selectively reviewed, as appropriate, in the course of activities performed during NQA assessments, surveillances, and verifications to assure that necessary verification points are included and that a mechanism is provided for the documentation of verification results." to "Procedures are selectively reviewed, as appropriate, by NQA to assure that necessary verification points and inspection criteria are included and that a mechanism is provided for the documentation of verification results." Deleted the description of when such procedure reviews are performed to allow for reviews at any time. Added the words "and inspection criteria" to broaden the review activity to ensuring that verification activities' acceptance criteria are also provided.	Clarification
118.	17.2.11.1	Changed beginning of first sentence from "A test program shall be established to ensure that all testing required to demonstrate that an item will perform" to "PECO Nuclear's test program assures that all testing required to demonstrate that a structure, system, or component will perform." Revision made to reflect current status of the test program and to utilize the SSC terminology consistently. Revised the beginning of the second sentence from "The testing shall be performed" to "Testing is performed" for consistency.	Editorial
119.	17.2.11.2	Changed the term "qualifications tests" to "qualification tests" to agree with common usage.	Editorial
120.	17.2.11.3	Replaced the colon at the end of the introductory clause with the words "the following." and removed the periods from the clauses in subitems "a" through "g." For subitem "c" replaced the words "such as:" with "including the following." and removed the periods from the clauses in subitems 1 through 6.	Editorial
121.	17.2.11.4	Changed the beginning of the sentence from "Measures shall be established" to "Measures are established" to reflect the status of the program.	Editorial
122.	17.2.11.5	Changed the beginning of the first sentence from "Test results shall be documented" to "Test results are documented" for consistent phraseology. Changed the beginning of the second sentence from "Unsatisfactory test results shall be documented as required by procedures, and corrective action shall be taken" to "Unsatisfactory test results are documented and corrective action taken" for simplification.	Editorial

<u>Paragraph No.</u>	<u>Description of Change</u>	<u>Change Classification</u>
123. 17.2.11.9	In the first sentence replaced the words "an ISI/IST Inspection Program has been developed and shall be implemented" with "an ISI/IST Inspection Program is implemented" for simplification. Changed the beginning of the second sentence from "The program shall include baseline examinations" to "The program includes baseline examinations" for consistent phraseology.	Editorial
124. 17.2.12.1	Changed the beginning of the sentence from "Measures shall be established" to "Measures are established" for consistency.	Editorial
125. 17.2.12.3	In the second paragraph, changed the words "the reference standards shall be chosen" to "the reference standards are chosen" for consistency. In the fourth paragraph added the parenthetical "(devices used for the calibration and evaluation of plant systems and components)" after the term "measuring and test equipment" to clarify the scope of M&TE for which the calibration precision requirements apply. Also changed "has an accuracy" to "have an accuracy" to make the subject and verb agree in number. Also added a comma after the word tolerances to improve readability.	Editorial
126. 17.2.12.4	Replaced the organizational group "Installation" with "Contract Management" to reflect the organizational name change.	Organizational
127. 17.2.13.1	Changed the words "shall be established" and "shall be specified" to "are established" and "are specified" for consistency. Also changed "existence shall be verified" to "existence verified."	Editorial
128. 17.2.13.2.1	Changed the entire paragraph from "Storage requirements shall be defined by cognizant personnel unless special instructions are provided by the vendor and approved by appropriate cognizant personnel." to "Storage requirements are established by cognizant personnel. Vendor instructions/recommendations are considered when establishing storage requirements." Change made to clarify that the responsibility for establishing storage requirements lies with PECON.	Clarification
129. 17.2.13.2.2	Changed the words "shall be inspected" to "are inspected" for consistency.	Editorial
130. 17.2.13.2.3	Changed the words "shall be delineated" to "are established" and added a comma after the adverbial phrase "as necessary." Also deleted the words "protection against" in order for the sentence to state what was intended; i.e., to avoid deleterious effects of environments, not avoid deleterious effects of protection against environments.	Editorial

<u>Paragraph No.</u>	<u>Description of Change</u>	<u>Change Classification</u>
131. 17.2.13.2.4	In the first sentence, changed the words "requirements shall be delineated" to "requirements are established" for consistency. Replaced the second sentence in its entirety. Changed "Labeling requirements are to be applied in a manner that is clearly visible and remain legible to specify special controls or handling instructions." to "Labels that identify special controls or handling instructions shall be plainly visible and affixed in a manner that ensures they are remain secure and legible." Revision made to improve clarity and readability.	Editorial
132. 17.2.14.1	In the first and second sentences, changed "Measures shall be established" and "measures shall provide" to "Measures are established" and "measures provide" for consistency. At the end of the first sentence changed "operation status" to "operating status" to agree with common usage. At the end of the second sentence, added the words "in order" before the words "to preclude" to help readability.	Editorial
133. 17.2.14.2	Changed the words "shall be controlled" and "shall be subject to" to "is controlled" and "are subject to" for consistency.	Editorial
134. 17.2.14.4	Replaced the first sentence "A receipt inspection program shall be documented and the physical segregation of items which have not satisfactorily completed receipt inspection shall be employed to assure that the status of items can be determined." with "The receipt inspection program requires items that have not passed receipt inspection to be physically segregated and their status clearly identified." Revision made to improve clarity. For the last sentence, replaced the words "the deficiency is" with "their deficiencies are" for agreement with the subject of the sentence, "Items."	Clarification Editorial
135. 17.2.4.7	Changed the beginning of the sentence from "Measures shall also provide" to "Measures are also established" for consistency. Also removed the words "of the nuclear power plant" because they are unneeded, and added a comma after the word "switches."	Editorial
136. 17.2.4.9	At the end of the sentence, replaced the words "shall be controlled" with "is controlled" for consistency. Also removed the words "for these activities" at the end of the sentence because they are unneeded.	Editorial
137. 17.2.15.1	Changed the beginning of the sentence from "Measures shall be established" to "Measures are established" to reflect the status of the NCR program. Edited the second sentence from "The measures established shall include, as appropriate, administrative and/or implementing procedures for the following functions for nonconforming materials, parts, or components." to "The measures address the following functions." Revised for simplification.	Editorial

	<u>Paragraph No.</u>	<u>Description of Change</u>	<u>Change Classification</u>
138.	17.2.15.1.b	Deleted this subitem altogether because it is redundant with its preceding subitem. As a result, the subitems that follow are renumbered.	Editorial
139.	17.2.15.1.b (new number)	Changed the wording from "Describe the nonconforming condition(s)" to "Description of the nonconforming condition(s)" for consistency in clause structure; i.e., each clause begins with a noun.	Editorial
140.	17.2.15.1.c (new number)	Replaced entirely with "Disposition which establishes the actions to be taken. The responsibility and authority for the disposition of nonconforming items shall be defined for each responsible organization. Nonconforming items may be dispositioned in any of the following methods."	Clarification
141.	17.2.15.1.d.1 (former number)	Deleted this entry altogether because it is now embodied in the new 17.2.15.1.c. As a result of the deletion, the subitems that followed this entry are now renumbered.	Editorial
142.	17.2.15.1.c.1 (new number)	Broke the discussion of restoration into two topics: repair and rework. As a result, replaced the entire entry with "Rework the item to conforming status. Rework is the process by which a nonconforming item is made to conform to a prior specified requirement by completion, remachining, reassembling, or other corrective means. Reworked items shall be reinspected in accordance with applicable procedures." Repaired items are now discussed by a new 17.2.15.1.c.1. Deleted reference to the term "restoration" so that the discussion concerning disposition categories better aligns with discussion of the topic by 10CFR50, Appendix B, Criterion 15.	Editorial
143.	17.2.15.1.c.2 (new number)	Replaced the former discussion on "repair" dispositions with "Repair the item by restoring the nonconforming characteristic to a condition such that the capability of the item to function reliably and safely is unimpaired, even though the item still may not conform to original requirements. Provide engineering rationale/justification and independent review for a "repair" disposition. Repaired items shall be reinspected in accordance with applicable procedures." Provided the additional discussion to better differentiate between "rework" and "repair."	Editorial
144.	17.2.15.1.c.3 (new number)	Replaced the words "Replacement with conforming material" with " Replace the item with a conforming one." to make the structure of the subitem list consistent; i.e., begin each sentence with the active verb.	Editorial

	<u>Paragraph No.</u>	<u>Description of Change</u>	<u>Change Classification</u>
145.	17.2.15.1.c.4 (new number)	Replaced the words "Acceptance for interim use until replaced." with "Accept the item for interim use until it is replaced." for consistency in structure. Also replaced the additional discussion that followed the first sentence with "Ensure that the item is clearly identified as nonconforming and controlled. Provide a description of the change, waiver, or deviation that is temporarily accepted; the duration of anticipated interim use; technical justification for using the item during this period; any compensatory measures to be taken; and independent review of the disposition." The topic of "repair" dispositions has been moved to the new 17.2.15.1.c.3. Added additional requirements to document the duration of anticipated interim use and the compensatory measures to be taken, if any.	Clarification
146.	17.2.15.1.c.5 (new number)	Added a new disposition "use-as-is" to allow for permanent acceptance of an item that did not meet its specified design requirements but which, upon evaluation, is determined to be acceptable. This is a variation of the "use-as-is" for interim use disposition category discussed in the new 17.2.15.1.c.4. Added to bring the disposition category discussion into alignment with 10CFR50, Appendix B, Criterion 15.	Clarification
147.	17.2.15.1.d.7 (former number)	Deleted the entry for signature approvals and date because it is part of the approval process and doesn't belong in the discussion on the types of dispositions. Documentation of NCRs is now addressed by the new 17.2.15.1.e.	Editorial
148.	17.2.15.1.f (former number)	Deleted this entry as a separate item. It is now part of the new 17.2.15.1.c.	Editorial
149.	17.2.15.1.e (new number)	Revised the former sentence from "Documentation of each item from first identification to final disposition" to "Documentation of the nonconforming item from initial identification to completion of corrective action." Revision made to ensure that implementation of the disposition is included with the NCR documentation. Also moved the topic of including or referencing the NCR in the records package for the affected item from the former 17.2.15.1.h to this paragraph.	Editorial
150.	17.2.15.3	Changed the words "shall be tagged" to "are tagged" for consistency in how on-going requirements are discussed. In the second sentence changed "Nuclear Engineering or Site Engineering is responsible" to "Engineering is responsible" for simpler presentation.	Editorial
151.	17.2.15.9	Changed the second sentence from "The testing and inspection of a repair shall be as given in the approved disposition of the nonconforming item." to "Repaired items shall be tested and inspected in accordance with the approved disposition." to broaden the requirement from just providing a disposition to implementing the disposition.	Clarification

	<u>Paragraph No.</u>	<u>Description of Change</u>	<u>Change Classification</u>
152.	17.2.16.1	In the first and third sentences, changed "Measures shall be established" and "measures established shall include" to "Measures are established" and "measures established include" for consistency.	Editorial
153.	17.2.16.1.a	Changed the words "cause of the condition shall be determined and documented, and corrective action taken" to "cause of the condition is determined and documented, resolution determined and documented, and corrective action taken" for consistency and to clarify that the entire response to a PEP issue is to be evaluated and documented.	Clarification
154.	17.2.16.2	Changed the words "Administrative procedures shall require" and "inspection requirements shall be included" to "Administrative procedures require" and "inspection requirements are included" for consistency. Also changed the term "components, systems, or structures" to "structures, systems, or components for consistency. Removed the "and" before the word "codes" and added a comma after "codes."	Editorial
155.	17.2.16.3	Changed the words "Procedures shall establish" and "procedures shall include" to "Procedures are established" and "procedures include" for consistency. Replaced the colon at the end of the second sentence with a period.	Editorial
156.	17.2.16.3.b	Deleted former "b" entry because it was an integral part of the former "c" entry. Former "c" and "d" are now "b" and "c."	Editorial
157.	17.2.16.3.b (new number)	Change the entry from "Identify and document, if possible, the root cause." to "Identify, if possible, and document the root cause(s)." Change made to recognize that more than one root cause is sometimes identifiable.	Clarification Editorial
158.	17.2.16.3.c (new number)	Revised to allow individuals other staff engineers to monitor equipment history and determine performance trends.	Clarification
159.	17.2.16.4.1	Changed from "Dependent on factors, such as the significance of the deficiency, the cause, and the corrective action taken, line organization management shall review the corrective action for deficiencies identified by NQA to determine the adequacy and effectiveness of such action. Dependent upon the same factors, NQA shall also verify the effectiveness of these corrective actions through subsequent assessments or surveillances." to "For significant NQA-identified issues, line organization management shall determine and document the adequacy and effectiveness of corrective actions taken. The consequences of the issue, the causes and generic implications of the issue, and the extent of corrective actions needed are factors that determine whether a issue is significant. NQA shall also assess the effectiveness of corrective actions through subsequent assessments or surveillances." Editorial change only.	Editorial

	<u>Paragraph No.</u>	<u>Description of Change</u>	<u>Change Classification</u>
160.	17.2.16.6	Changed "NQA periodic assessments of the NCR procedure" to "NQA periodic assessments of nonconformance reports" to clarify that this activity is not a periodic procedure review, but instead, is a regularly scheduled oversight activity in which corrective actions performed for nonconformances and PEP issues are assessed.	Clarification Editorial
161.	17.2.17.1	In the second sentence, added "maintenance of records" to the list of requirements.	Clarification
162.	17.2.17.7	In the last sentence, added the word "in" for grammatical sense.	Editorial
163.	17.2.17.8	At the end of the introductory sentence, replaced the colon with a period for consistency.	Editorial
164.	17.2.18.6	At the end of the introductory sentence, replaced the colon with a period and removed the periods at the ends of the existing clauses. Removed last sentence stating "The assessment program is described in section 17.2.18." because it was self-referencing and unneeded.	Editorial
165.	17.2.18.6.d	Capitalized "Operational QA Program."	Editorial
166.	17.2.18.6.e	Changed "The emergency and implementing procedures" to "The Emergency Plan and implementing procedures" to properly refer to the Emergency Plan.	Editorial
167.	17.2.18.6.g	Replaced former subitems g, h, and i with "The Fire Protection Program and implementing procedures, including an inspection and assessment of the Fire Protection and Loss Prevention Program, shall be performed utilizing an outside qualified fire protection consultant at least once every 24 months." As a result of effectively deleting 2 subitems, former j through n are renumbered. Replacement done in accordance with NRC approval of change to Fire Protection assessment frequency. Reference ECR-	Programmatic
168.	17.2.18.6.k (new number)	Changed the term "unit operation" to "facility operation" to accommodate the two-unit facility.	Editorial
169.	17.2.18.6.l (new number)	Revised the sentence from "The performance of activities required by the QA Program to meet the criteria of Regulatory Guide 4.15, December, 1977, at least once per 24 months." to "The QA Program activities required by Regulatory Guide 4.15, December 1977, "Quality Assurance for Radiological Monitoring Programs (Normal Operations) - Effluent Streams and the Environment," at least once per 24 months" in order to provide the title of the Reg. Guide and for simpler wording.	Editorial
170.	17.2.18.6	In last paragraph, changed "semi-annually" to "at least once every 6 months" to preclude possible confusion over the term semiannually.	Editorial

	<u>Paragraph No.</u>	<u>Description of Change</u>	<u>Change Classification</u>
171.	17.2.18.7	Changed "procedures shall require" to "procedures require" for consistency.	Editorial
172.	17.2.18.11	Deleted this sentence altogether because reference to UFSAR section 13.4 is no longer necessary after moving the NRB discussion to Section 17.2.18. Paragraphs 17.2.18.12 and 17.2.18.13 are renumbered as a result.	Editorial
173.	Appendix 17.2.I	Added "PECO NUCLEAR ADMINISTRATIVE PROCEDURES" as a header above the list of procedures to clarify that all these procedure types include administrative procedures. Also deleted "NEDP-Series" procedures from the list because they have all been converted to other procedure types.	Clarification
174.	Appendix 17.2.II	Changed the first sentence from "PECO Energy follows the ANSI Standards and USNRC Regulatory Guides, as described below." to "PECO Energy is the licensee and retains full responsibility for all LGS activities. PECO Nuclear, a Unit of PECO Energy, is responsible for execution of all activities necessary to comply with the following ANSI Standards and USNRC Regulatory Guides, as amended by the listed alternatives and exceptions described below." Added the sentence to clarify the relationship between PECO Energy and PECO Nuclear Also replaced colons with periods at the end of introductory sentences throughout for consistency.	Clarification Editorial
175.	Appendix 17.2.II item c.4	Deleted this item because the description and activities of the NRB as discussed in section 17.2.1.2.5 comply with the requirements of ANSI N18.7-1976/ANS-3.2. No exception or alternative needs to be stated. As a result of this deletion, subitems c.5 through c.22 are renumbered.	Editorial
176.	Appendix 17.2.II item e.5	Included "ASME" in the reference to ANSI/ASME 45.2.23-1978 to be consistent with its designation on the standard itself.	Editorial
177.	Appendix 17.2.II item p	Added "Rev. 1" to the Reg. Guide 1.144 reference for completeness and consistency.	Editorial

10CFR50.71(e)(2)(ii) requires that revisions to the UFSAR include changes made under the provisions of 10CFR50.59, but not previously submitted to the NRC. Accordingly, the list below identifies those plant modifications and projects included in Revision 6 of the Limerick Generating Station, Units 1 and 2, Updated Final Safety Analysis Report (UFSAR). The list does not represent a complete list of UFSAR change packages incorporated into Revision 6.

<u>Modification Number</u>	<u>Unit Number</u>	<u>Description</u>
6240	1	Elimination of the RHR Steam Condensing Mode on Unit 1.
P-00100	1 & 2	Retirement of the Plant Process Computer and the Emergency Response Display System as a result of the installation of the new Plant Monitoring System.
P-00195	1 & 2	Replacement of the Control Rod Drive Pump, Gearbox and Motors with a Direct Drive Pump (Pump-Motor Only).
P-00210	1 & 2	Replace RCIC Steam Admission Valve HV-050-1(2)F045 to improve Speed Control of RCIC Turbine during RCIC System Startup.
P-00227	2	Elimination of the RHR Steam Condensing Mode on Unit 2.
P-00291	1 & 2	Replacement of 28 Main Control Room Large Case Multipoint Recorders with a PC Computer Based Data Acquisition System.
P-00292	1 & 2	Replacement of the Unit 1 and 2 Post Accident Monitoring (PAM) Recorders with Westronics 2100C Series Recorders.
P-00333	1 & 2	Installation of a Water Treatment Plant Trailer Hookup to allow the use of Reverse Osmosis Water Processing.
P-00373	1 & 2	Removal of the Radwaste Building Decontamination Transfer Table OA-5331.
P-00411	1 & 2	Condensate Filter Demineralizer Upgrade through the use of Non-precoat Style Filter Elements.
P-00447	1 & 2	Installation of Test Taps to take Diesel Generator Fuel C ₁₀ Samples.
P-00458	1	EHC Reliability Enhancements to Reduce Spurious Turbine Trips and Resultant Reactor Scrams.

<u>Modification Number</u>	<u>Unit Number</u>	<u>Description</u>
P-00565	1	Installation in the Unit 1 Drywell of 480V and 120V Power Receptacles at Strategic Points for Use During Outages.
P-00610	1 & 2	Design and Installation of Work Management Centers Outside Unit 1 Turbine and Reactor Buildings for Use During Outages.
94-00511	1 & 2	Removal of the Radwaste Hydraulic Press 005324.
94-06387	1	Modify RHR/LPCI Injection Valves HV-051-1F017B and HV-051-1F017D and Core Spray Valves HV-052-1F005 and HV-052-1F037 to eliminate the potential for Pressure Locking through the addition of an External Piping Bypass.
94-06389	1	Replace Disc/Wedge on RCIC Injection Valve HV-049-1F013 to Reduce the Potential for Pressure Locking and Thermal Binding.
95-01110	1 & 2	Design Permanent Jumper Connections for RPS/UPS Panels 1A-C248 and 1B-C248 to allow the performance of Relay Trip Testing.
95-02335	1	Modify HPCI Injection Valve HV-055-1F006 to Reduce the Potential for Pressure Locking.
95-02336	1	Modify HPCI Pump Discharge Injection Valve HV-055-1F105 wedge to Reduce the Potential for Pressure Locking.
95-05340 95-03820 94-10694	1 & 2	Reactor Enclosure and Refuel Area Secondary Containment automatic isolation logic interlock which allows HVAC Zones I/II and III to be logically combined to allow normal ventilation system operation during the initial stages of a refuel outage.
96-01236	1	Modify LPCI Injection Valve HV-051-1F017D Disc and Remove External Bypass Line Installed to Eliminate Pressure Locking.
96-03220	1	Create a Controllable Vent Path from 1A Core Spray Loop to the Suppression Pool.
96-03700	1 & 2	Renovation of the Existing Chemistry Lab.