



PECO NUCLEAR

A UNIT OF PECO ENERGY

NRC 10 CFR 50.54 (f)

PECO Energy Company
Nuclear Group Headquarters
965 Chesterbrook Boulevard
Wayne, PA 19087-5691

May 7, 1997

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 20555-0001

Subject: Peach Bottom Atomic Power Station, Units 2 and 3
Limerick Generating Station, Units 1 and 2
Request for Information Pursuant to 10 CFR 50.54 (f) Regarding
Adequacy and Availability of Design Bases Information.

Reference: Letter from D. B. Fethers (PECO Energy Company) to US
Nuclear Regulatory Commission (USNRC) dated February
4, 1997

Dear Sir:

The Referenced letter provided PECO Energy's response to NRC's request for information involving adequacy and availability of Design Bases information. As part of this response, PECO Energy performed an extensive assessment in order to provide a complete and thorough response to the subject request for information. This assessment reviewed the current configuration management programs and controls, the translations of the design bases into the appropriate operating, maintenance and testing procedures, the performance of the Systems, Structures, and Components (SSCs) as it relates to the design bases,

140033



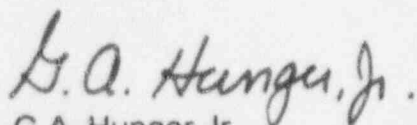
the problem identification and corrective action processes, the results of the extensive internal and external assessments of the configuration management program and processes, and the efforts which PECO Energy has pursued in response to various industry events and initiatives and NRC developments. Attachment 3 to the reference letter listed and described each commitment PECO Energy made as a result of this assessment.

This letter provides a response, in Attachment A, to commitment 3 of the Referenced letter. Attachment B provides a response to commitment 5 of the Referenced letter. Both Attachments A and B identify the issue, the previously made commitment, and the response to the commitment. While the corrective actions in response to these commitments are on-going, this letter completes the required responses for commitments 3 and 5 from the Referenced letter.

In addition, Attachment C contains an updated page 13 of Attachment 1 to the Referenced letter. This update is necessary to correct a pagination error which occurred prior to duplication of the response letter. It should be noted that the response review process outlined in the Referenced letter included the missing wording and that this wording does not change the intent or the conclusions of the response.

All three attachments refer to PECO Nuclear, which is a unit of PECO Energy. If you have any questions regarding this submittal, please contact me.

Very truly yours,



G A. Hunger Jr.

Director, Licensing

Enclosures: Attachments, Affidavit

cc: H. J. Miller, Administrator, Region I, USNRC
W. L. Schmidt, USNRC Senior Resident Inspector, PBAPS
N. S. Perry, USNRC Senior Resident Inspector, LGS

COMMONWEALTH OF PENNSYLVANIA:

: SS.

COUNTY OF CHESTER

:

J. B. Cotton, being first duly sworn, deposes and says:

That he is Vice President of PECO Energy Company; that he has read the letter dated May 7, 1997, for Peach Bottom Facility Operating Licenses DPR-44 and DPR-56 and Limerick Operating Licenses NPF-39 and NPF-85, and knows the contents thereof; and that the statements and matters set forth therein are true and correct to the best of his knowledge, information and belief.

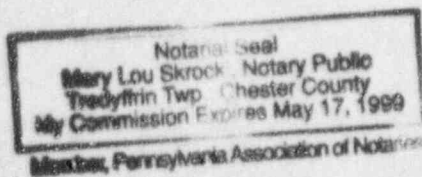
John B. Cotton

Vice President

Subscribed and sworn to
before me this 7th day
of May 1997.

Mary Lou Skrocki

Notary Public



ATTACHMENT A

COMMITMENT NO. 3: Design Baseline Document (DBD) maintenance

ISSUE:

Assessments of the DBD maintenance process have been performed annually since 1994, and have indicated that there is room for improvement in the administrative and technical areas of the DBD maintenance process. As a result, the process controlling DBD updates was revised to streamline the requirements governing DBD maintenance and strengthen the requirements governing DBDs in the design change process. The DBD maintenance process is currently being re-evaluated to determine its efficiency and effectiveness. Results to date indicate that there are opportunities to further improve the DBD maintenance process. The majority of the items identified by the assessment pertain to DBD format and information consistency. Another area being evaluated is the technical adequacy of changes or additions being made to DBDs. A sampling of ECRs which affect DBDs is being evaluated for technical accuracy and adequacy. Appropriate corrective actions will be initiated based on the evaluation.

COMMITMENT:

PECO Nuclear is committed to complete an evaluation of the process, procedure and division of responsibility for Design Baseline Document maintenance and is evaluating the scope and schedule of this task. Corrective actions associated with the program concerns will be identified and tracked via the PEP process. PECO Nuclear will provide written confirmation to the NRC within 30 days of completion of this evaluation and identification of corrective actions.

RESPONSE:

An evaluation of Design Baseline Document (DBD) maintenance was performed using the Performance Enhancement Program (PEP) to identify conditions in the process which are adverse to quality, root causes of the conditions, and corrective actions to correct the conditions. The evaluation was completed on April 15, 1997. The root causes include the DBDs having a complex format combined with less than adequate procedural guidance on maintenance of the DBD documents.

As part of this process, corrective actions have been identified. These corrective actions are focused on improving the process to address the identified root causes.

ATTACHMENT B

COMMITMENT NO. 5: Software Configuration Control.

ISSUE:

A prior review of Performance Enhancement Program (PEP) issues and assessments revealed that the area of software quality needs improvement. Specifically, problems were encountered in certain changes to PIMS software due to incomplete design requirements and inadequate testing of software interfaces. In the plant process computer area, some problems have been related to incorrectly configured database elements which resulted in NSSS software modules halting. In both of these areas, PEP issues were generated to identify root causes and corrective actions have been initiated. In mid-1996, in order to improve software quality, PECO Nuclear initiated an in-depth review of current software management practices. In support of this initiative, a review was recently completed by an independent consultant which concluded that improvements are needed in the area of software design, interfaces, testing and data control. Recommendations were made to strengthen software quality assurance procedures and to adopt an industry accepted software development model in order to create a more rigorous software CM process. In addition, NQA and ISEG personnel have been actively involved in several assessments to ensure root causes are determined and corrective actions identified.

COMMITMENT:

The evaluation of the recognized weakness of software configuration control will be completed and appropriate corrective actions implemented. Corrective actions associated with the software configuration control concerns will be identified and tracked via the PEP process. PECO Nuclear will provide written confirmation to the NRC within 30 days of completion of this evaluation and identification of corrective actions.

RESPONSE:

A review of the Performance Enhancement Program (PEP) issues and assessments revealed that software problems have been encountered due to incomplete design requirements and inadequate testing. In these areas, PEP issues were generated to identify the root causes and initiate corrective actions. In response to these concerns, an in-depth review was conducted by an independent consultant to identify the causes for the deficiencies and propose corrective actions. The root causes identified in the study can be summarized as a lack of adequate planning and training, and inconsistencies in the level of documentation required.

ATTACHMENT B

To address the weaknesses identified, PECO Nuclear is taking immediate corrective action to revise procedures to provide clearer direction. Long term corrective actions are being taken to address the identified root causes. Training and corrective action effectiveness review will be included as part of the corrective action implementation.

ATTACHMENT C

UPDATED PAGE 13

ATTACHMENT 1

being violated. Operations approve the performance of all plant testing and also conduct certain testing such as the Surveillance, Routine, and Modification Acceptance Testing.

11. Maintenance Configuration Control

Procedure A-C-26 establishes controls for plant maintenance/modification work, corrective and preventive maintenance, Fix-It-Now and special processes (Welding, Chemical Cleaning, NDE). Work planning activities are processed using a PIMS Action Request and Work Orders. The Fix-It-Now teams are work teams that perform limited scope work on plant equipment. The planning process includes assuring that the material to be used is evaluated and qualified for the application by reviewing the CRL, BOM and IPC. The planning process also identifies the necessary implementing procedures, actions, testing requirements and verifications to assure configuration is maintained.

12. Testing Configuration Control

Plant testing procedures, such as post maintenance, modification, surveillance, routine and Plant Evolution Special Tests are performed to verify component and system operability. After satisfactory testing, the appropriate configuration is reestablished.

The Troubleshooting Program makes changes in system configurations to perform troubleshooting activities on plant equipment in accordance with A-41.1 (LGS) and A-42.1 (PBAPS). The Work Group Supervisor indicates on a Troubleshooting Control Form (TCF) whether a 10CFR50.59 determination is needed. If the TCF requires a Safety Evaluation, then that Safety Evaluation is presented to the Plant Operations Review Committee (PORC) per A-C-4 before performing the TCF. TCFs that require Safety Evaluations are evaluated to determine if a TCF is the appropriate administrative control mechanism to be utilized.

13. Chemistry and Radiological, Environmental and Meteorological Monitoring (REM) Configuration Control

Chemistry and REM procedures are developed to support appropriate operational configuration. Certain Chemistry procedures support compliance to the Technical Specifications. The Offsite Dose Calculation Manual (ODCM) provides methods for calculating potential dose to members of the public outside the site boundary. The ODCM is revised to reflect changes to the radiological environmental monitoring program and to reflect changes to effluent monitoring equipment.

14. Radwaste Configuration Control

The Radwaste Process Control Program describes the interfaces, responsibilities, and requirements necessary to assure that waste generation, processing, packaging, storage, shipping and disposal activities are conducted in compliance with the facility design bases. Additional Radwaste procedures are developed to assure compliance to radwaste and hazardous material requirements specified in 10CFR, 29CFR, 40CFR and 49CFR.

15. Fire Protection Configuration Control

Procedure A-C-920 describes the requirements for the Fire Protection Program (Ref. LGS UFSAR Appendix 9A, Fire Protection Evaluation Report and PBAPS Fire Protection Program document) and assures compliance with license conditions and the fire protection commitments in the UFSAR. Changes to the Plant Fire Protection Program invoke the ECR change process and require a 10CFR50.59 Review in accordance with LR-C-13.