



**PECO NUCLEAR**

A Unit of PECO Energy

**John B. Cotton**  
Vice President  
Station Support

**10CFR50.71(e)(4)**  
**10CFR50.54(a)(3)**

PECO Energy Company  
965 Chesterbrook Blvd.  
Wayne, PA 19087-5691  
610 640 6100

June 23, 1997

Docket Nos. 50-277  
50-278

License Nos. DPR-44  
DPR-56

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

**SUBJECT:** Peach Bottom Atomic Power Station, Units 2 and 3  
Submittal of Revision 14 of the Updated Final Safety Analysis Report and Revision 9 of the Fire Protection Program

Dear Sir:

In accordance with 10CFR50.71(e)(4) and 10CFR50.4(b) (6), this letter submits one original and ten copies of Revision 14 of the Updated Final Safety Analysis Report (UFSAR) and Revision 9 of the Fire Protection Program (FPP) for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3. The enclosed copies are being provided to the NRC with a page revision listing that identifies the latest revision date of all current pages in accordance with 10CFR50.71(e)(1). We have also provided page replacement instructions for incorporating Revision 14 into the UFSAR and Revision 9 into the FPP. As required by 10CFR50.71(e)(5), each replacement page contains a bold vertical line in the margin adjacent to each area changed along with the date of the change. Revision 9 of the FPP and Revision 14 of the UFSAR reflect 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 14 and FPP Revision 9 reflect changes made to PBAPS, Units 2 and 3, under the provision of 10CFR50.59 at least up to December 31, 1996.

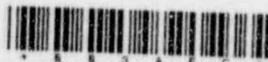
The enclosed UFSAR Revision 14 also contains the annual revision of the Quality Assurance Program Description (QAPD) which is being submitted in accordance with 10CFR50.54(a)(3). The revised QAPD (i.e., Appendix D of the UFSAR) reflects editorial and organizational changes and those changes described in Attachment 1 as required by 10CFR50.54(a)(3) since the previous submittal. Based on the information provided in Attachment 1, we have concluded that the QAPD changes included in Revision 14 of the UFSAR do not reduce the commitments in the QAPD previously accepted by the NRC.

As required by 10CFR50.71(e)(2)(i), I certify that to the best of my knowledge, Revision 9 of the FPP and Revision 14 of the UFSAR accurately reflect 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 Revision 9 of the FPP or Revision 14 of the UFSAR, but not previously submitted to the NRC.

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June 23, 1997  
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If you have any questions or require further information, please contact us.

Very truly yours,

A handwritten signature in cursive script, appearing to read "John B. Cotton".

Enclosure  
Attachments

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

RECEIPT ACKNOWLEDGEMENT FORM

For PBAPS USFAR Controlled Copy # 1-11

For Fire Protection Program Controlled Copy # 1-11

Assigned to: Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555  
Mail Station 12 G18  
Attn: Document Control Desk

Please sign below as evidence of receipt of the Peach Bottom Atomic Power Station Updated Final Safety Analysis, Revision 14 and Peach Bottom Atomic Power Station Fire Protection Program, Revision 09, replacement pages. These are controlled documents that must be inserted into your copy of the UFSAR and FPP volumes.

Please take this opportunity to verify the accuracy of your documents by conducting a self-audit. This can be done, while inserting the revision, by making a comparison of each individual page in your documents to the enclosed Page Revision Listing. The most current revision is indicated in the bottom right-hand corner of each page. This revision number should coincide with that indicated on the Page Revision Listing.

If these controlled documents are not needed, or you wish to report missing pages, please contact the UFSAR Revision Coordinator in Licensing at the address below.

\_\_\_\_\_  
Signed

\_\_\_\_\_  
Organization

\_\_\_\_\_  
Date

Return to: Jerry Phillabaum (610-640-6785)  
PECO Energy Company  
62A-1, Licensing Section  
965 Chesterbrook Boulevard  
Wayne, PA 19087-5961

## ATTACHMENT 1

## PECO Nuclear

## PBAPS Quality Assurance Program Description Changes

Revision 14 - May 1997

Item No.	Paragraph Number	Description of Change	Change Classification
1.	Header on each page of Section D.11, Table of Contents, and List of Exhibits	Changed header from "PBAPS" to "PBAPS UFSAR."	Editorial
2.	Table of Contents, Title Line for Section D.11	Clarified that the QAPD's content and structure is in accordance with the Standard Review Plan, Section 17.2.	Clarification Editorial
3.	List of Exhibits 17.2.1 17.2.1.2 17.2.1.2.3 17.2.2.2.1 17.2.5.1.2 Exhibits I through X	Changes the term "Exhibit" to "Figure" and renumbered as Figures 17.2.1 through 17.2.10 instead of as Exhibits I through X in order to be consistent with the terminology and numbering used in the LGS QAPD.	Editorial
4.		Added five unnumbered paragraphs between the heading for Section D.11 and the heading for subsection 17.2.1, Organization. Content of added paragraphs is derived from the introductory text to the LGS QAPD. Text added to achieve greater consistency with the LGS QAPD. The added paragraphs explain the relationship between PECO Energy and PECO Nuclear, provide a summary of the documents that constitute the QA Program, definitively state that the QA Program complies with 10CFR50 Appendix B, and explain how PECO Nuclear ensures that the QA Program requirements are implemented when specific tasks are delegated to outside organizations.	Editorial
5.	List of Exhibits 17.2.2.2.3 17.2.3.2 17.2.3.2.3 17.2.4.4 17.2.4.7 17.2.7.2.1 17.2.7.5 17.2.7.5.1 17.2.9.1 17.2.15.3 17.2.15.6 17.2.16.1 Appendix 17.2A	Changed "PECO Energy" to "PECO Nuclear."	Organizational  ECR 96-02783

Item No.	Paragraph Number	Description of Change	Change Classification
6.	Table of Contents for Exhibits 17.2.1 17.2.1.1 17.2.1.2 17.2.1.2.3 17.2.2.1.8 17.2.2.1.9 17.2.2.1.10 17.2.2.2 17.2.3.3.3 17.2.4.7 17.2.4.7.1 17.2.9.1 17.2.9.1.2 Appendix 17.2A Exhibit I Exhibit II Exhibit X	Changed "Nuclear Generation Group" to "PECO Nuclear" because of organizational name change.	Organizational  ECR 96-02783
7.	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 17.2.1.2.5.3 17.2.1.2.5.11 17.2.1.2.5.12 17.2.2.1.9 17.2.2.3.1 17.2.2.8 17.2.16.4 17.2.18.1.1.k	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  ECR 96-02783
8.	17.2.1.2 17.2.1.2.3 17.2.1.2.3.b 17.2.1.2.3.h 17.2.1.2.3.1 17.2.1.2.5.2 17.2.1.2.5.9 17.2.2.1.8 17.2.2.2 17.2.2.2.2 17.2.2.3.1 17.2.2.6 17.2.5.1 17.2.10.5 17.2.18.1.1 17.2.18.1.5	Changed "Quality Assurance Program" to QA Program" and "Quality Assurance Program Description" to "QA Program Description" for consistent word usage throughout the QAPD.	Editorial
9.	17.2.1	Deleted sentence which provided a count of the organizations within PECO Energy and PECO's number of Senior VPs and VPs. The referenced Organization Chart better describes the PECO Energy organizational structure. Also, reworded last sentence which identifies the PECO Energy organizations that are not part of PECO Nuclear but which support PECO Nuclear (PECON).	Editorial  ECR 96-02783



Item No.	Paragraph Number	Description of Change	Change Classification
10.	17.2.1.1 17.2.2.1.9	Changed title of PECO Energy's "Chairman of the Board and Chief Executive Officer" to "Chairman of the Board." Also changed title of PECO Energy's "President and Chief Operating Officer" to "President and Chief Executive Officer." Both changes made to reflect current organizational titles.	Organizational ECR 96-02783
11.	17.2.1.2	Added a paragraph discussing the new position of Senior Vice President, Nuclear Operations, to the organizational description.  Also edited last sentence to more broadly describe the types of support provided by contractors and non-PECON organizations.	Organizational Editorial ECR 96-02783
12.	17.2.1.2.1	Changed former UFSAR section cross-reference from Section 13.2.3 to Section 13.2.2 to correct the misreference. Section 13.2.3 addresses the qualifications of plant personnel; Section 13.2.2 addresses plant organizational structure. Also changed the beginning of the sentence from "The PBAPS station organization.." to "The PBAPS operating organization..." in order to be consistent with the wording of Section 13.2.2.	Editorial
13.	17.2.1.2.2	Revised former UFSAR section cross-reference from section 13 to section 13.2.1 to better pinpoint location of the UFSAR's description of Station Support Department's responsibilities.	Editorial
14.	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
15.	17.2.1.2.3.a	Changed "radiological and environmental monitoring" to "radiological environmental monitoring." Also added meteorological monitoring to the list of activities to be consistent with the LGS QAPD..	Clarification
16.	17.2.1.2.3.e	Revised listed responsibility from "Require tracking and verification of corrective action and problem resolution for all QA-identified Corrective Action Requests (level 2 and 3 CAR issues)" to "Require tracking and verification of corrective action and problem resolution for all NQA-identified level 1, 2, and 3 PEP issues" in order to clearly capture this responsibility for the highest level of issues and to accommodate a change in terminology. The term "PEP issues" now encompasses both "CAR issues" and "DEV issues" (Deviation issues). Also deleted last sentence which specifically addressed the tracking of deviations because this activity is incorporated into the statement above which requires tracking of level 1, 2, and 3 PEP issues.	Editorial
17.	17.2.1.2.3.f	Enclosed the sentence following the clause in parenthesis.	Editorial
18.	17.2.1.2.3.g	Changed "...review of QA assessments..." to "...review of NQA assessments..." in order to clarify that it is NQA assessments, surveillances, and verifications that the Director, NQA, reviews.	Editorial
19.	17.2.1.2.3.h	Removed the second "periodically" in the sentence to eliminate redundancy.	Editorial

Item No.	Paragraph Number	Description of Change	Change Classification
20.	17.2.1.2.3.i	Added responsibility for Director, NQA, to control the contents of the QAPD. Added to be consistent with LGS QAPD. As a result of the added substep, formerly numbered substeps i through o are renumbered j through p.	Clarification
21.	17.2.1.2.3.j	Changed the words "...implementing the QA procedures..." to "...implementing the NQA procedures..." in order to clarify that the Director, NQA, is responsible for ensuring that NQA personnel are trained to implement NQA departmental procedures.	Clarification
22.	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
23.	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
24.	17.2.1.2.3.p	Changed the clause "Assess and verify the adequacy and effectiveness of activities covered by the QA program" to "Assess through NQA assessments, surveillances, and quality verifications, the adequacy and effectiveness of activities covered by the QA program." Change made for consistency with the LGS QAPD.	Editorial Consistency
25.	17.2.1.2.3.1	Broke existing 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, Peach Bottom Quality Division, and the Director, NQA; the qualification requirements of the Manager (relocated from paragraph 17.2.1.2.3.2.4); and the introductory sentence to the list of responsibilities of the Manager. Restructuring done to address one topic per paragraph. Relocation of 17.2.1.2.3.2.4 made for more logical placement of the requirement. Also changed the introductory word for each of the listed responsibilities from a participle to a present tense verb in order to be consistent with the other responsibility lists within this section. (For example: Changed "Performing trend analysis" to "Perform trend analysis.")	Editorial
26.	17.2.1.2.3.1.1	Revised last sentence from "The Manager's responsibilities include:" to "The Manager has the following responsibilities."	Editorial
27.	17.2.1.2.3.1.1.a	Capitalized the word "Section" because the sentence is referring specifically to the PBAPS Quality Division Assessment Section.	Editorial
28.	17.2.1.2.3.1.1.h	Added new responsibility to "Direct the scheduling, planning, and performance of surveillance in the areas of engineering, operations, health physics, radioactive waste, chemistry, security, post-maintenance/modification testing, surveillance testing, maintenance, fire protection, plant modification, and emergency planning" Addition made to be consistent with the LGS QAPD. Also, numbering of former listed responsibilities h and i changed to i and j.	Additional detail

Item No.	Paragraph Number	Description of Change	Change Classification
29.	17.2.1.2.3.1.1.i (formerly 17.2.1.2.3.1.1.h)	Changed "Development and approval of Surveillance Guidelines." to "Assure development of and approve Surveillance Guidelines." In order to keep the structure of section 17.2.1.2.3.1.1 consistent.	Editorial
30.	17.2.1.2.3.1.2	Changed the title "Superintendent" to "Supervisor" because the position title has changed.	Organizational
31.	17.2.1.2.3.1.2.b	Changed the sentence "Oversee the verification activities in the areas of radwaste/radmaterial packaging, handling, and shipment; 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." This change was previously evaluated under a 10CFR50.54(a) Review which evaluated the transfer to the line organization the responsibility to verify radwaste activities.	Functional
32.	17.2.1.2.3.1.2.d	Changed the word "Over view" to "Oversight" in order to use the correct word.	Editorial
33.	17.2.1.2.3.1.2.f	Changed "Quality Verification" to "QV" for consistent use of the abbreviation.	Editorial
34.	17.2.1.2.3.1.2.i	Changed "Document conditions adverse to quality resulting from QV activities and verify corrective action" to "Document conditions adverse to quality identified by QV activities and verify corrective action." Change made to clarify that conditions adverse to quality don't result from performance of a verification activity, but, rather, are identified during the verification activity.	Editorial
35.	17.2.1.2.3.2.1	Replaced the colon at the end of the introductory clause with the words "the following."	Editorial
36.	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
37.	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
38.	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



Item No.	Paragraph Number	Description of Change	Change Classification
39.	17.2.1.2.3.3 and 17.2.1.2.3.3.1	Combined both sections into one because the Manager, CNQ, is responsible for both and to remove the redundancy that resulted from listing some responsibilities twice. Deleted from the introductory sentences of 17.2.1.2.3.3 mention of the Assessment Section. Deleted Section 17.2.1.2.3.3.1 altogether after incorporating the listed responsibilities into 17.2.1.2.3.3. For the listed responsibilities, changed the introductory word to a present tense verb in order to be consistent with the other responsibility lists within this section. (For example: Changed "Identification of specific and programmatic deficiencies" to "Identify specific and programmatic deficiencies")	Editorial
40.	17.2.1.2.3.3.a	Revised the entry "Manuals and procedures" to read "Prepare, revise and maintain the NQA manuals and procedures."	Editorial
41.	17.2.1.2.3.3.b	Revised the entry "Vendor assessments and surveillances" to "Schedule, plan, and perform vendor evaluation activities, including assessments, surveillances, and commercial grade surveys" in order to incorporate the responsibilities listed by former 17.2.1.2.3.3.1.d	Editorial
42.	17.2.1.2.3.3.c	Inserted the responsibility "Maintain the Evaluated Vendors List" which was relocated from former 17.2.1.2.3.3.1.e	Editorial
43.	17.2.1.2.3.3.d (formerly 17.2.1.2.3.3.c)	Revised the entry from "Training" to "Coordinate and support NQA training" to retain the better description of the activity that was provided by the now deleted paragraph 17.2.1.2.3.3.1.h	Editorial
44.	17.2.1.2.3.3.e (formerly 17.2.1.2.3.3.d)	Revised the entry "Oversight of the quality activities of Nuclear Support" to "Schedule, plan, and perform internal assessments and surveillances of Station Support Department's quality-related activities, including engineering and nuclear fuel activities." to accommodate an organizational name change and to retain the more detailed descriptions of these activities that were provided by the now deleted paragraphs 17.2.1.2.3.3.1.b, 17.2.1.2.3.3.1.c, and 17.2.1.2.3.3.1.f.	Organizational Editorial
45.	17.2.1.2.3.3.g (formerly 17.2.1.2.3.3.f)	Revised the entry from "Performing trend analysis" to "Analyze trend information (including quality deficiencies) and periodically issue trend reports" to retain the more detailed description of this activity that was provided by the now deleted paragraph 17.2.1.2.3.3.1.g.	Editorial
46.	17.2.1.2.3.3.h (formerly 17.2.1.2.3.3.g)	Revised the entry "Conducting internal assessments and surveillances at the corporate offices" to "Schedule, plan, and perform 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
47.	17.2.1.2.3.3.k (formerly 17.2.1.2.3.3.j)	Deleted the word "UFSAR" that used to precede "QA Program Description" for consistency in nomenclature.	Editorial
48.	Former 17.2.1.2.3.3.k	Deleted this paragraph which used to state "Review and coordinate revision of NQA procedures" because it was redundant with 17.2.1.2.3.3.a.	Editorial

Item No.	Paragraph Number	Description of Change	Change Classification
49.	17.2.1.2.4	Revised step 17.2.1.2.4.6.A to exclude from PORC's review responsibilities those administrative procedures that are not implemented by station personnel.	Editorial
50.	17.2.1.2.5.2	Revised first sentence from "The NRB shall consist of a Chairman and at least seven other Members, with no more than a minority being members of the plant operating staff." to "The NRB shall consist of a Chairman and at least five members who are PECO Energy employees and at least two outside members who are not PECO Energy employees, with no more than a minority being members of the plant operating staff." Also added as the second sentence "The NRB shall be composed of no less than eight members and no more than twelve members." Changes made to make this paragraph consistent with wording provided by the LGS QAPD.	Editorial
51.	17.2.1.2.5.3	Corrected the last sentence to have the subject, object, and verb agree in number.	Editorial
52.	17.2.1.2.5.6	Added a paragraph discussing competence of the NRB members and alternates in the area of QA and 10CFR50, Appendix B, and that they be cognizant of the PB QAPD. Paragraph added for better alignment with the LGS QAPD and LGS Tech Specs. For existing paragraph, changed "five" to "5" and "three" to "3" for consistent use of numbers in text.	Additional Detail Editorial
53.	17.2.1.2.5.7	Changed "LERs" to "Licensee Event Reports" as standard editorial practice to provide the meaning of acronyms on first time use.	Editorial
54.	17.2.1.2.5.8	Revised second sentence from "A quorum of the NRB shall consist of at least half of the Members, and shall include the Chairman or the Vice Chairman" to "A quorum of the NRB shall consist of the Chairman or the Vice Chairman, and at least four, but not less than half, of the voting members." Change made to be consistent with the LGS QAPD and LGS Tech Specs.	Editorial
55.	17.2.1.2.5.9	Revised the introductory statement to allow NRB appointees to perform reviews on the NRB's behalf. ECR 97-00031 processes this revision. For the review responsibility listed as sub-item, e, added a comma after the word "codes" in order to correct the punctuation.	Clarification Editorial
56.	17.2.1.2.5.10	Restructured sentence to emphasize that NQA and the Licensing Section shall be available to the support the NRB instead of implying that the NRB must use these two organizations for support functions.	Editorial
57.	17.2.1.2.5.11	In the first sentence, revised the "will" to a "shall" for editorial consistency. At the end of the first sentence clarified that the NRB Chairman's reports to the President of PECO Nuclear shall be "on a regular basis concerning the requirements for assuring the public and plant personnel of safe operation of the nuclear plants. For the second sentence, clarified that the summaries of the NRB's decisions and recommendations provided to the Office of the President and Chief Operating Officer shall be in written form. Changes made to be consistent with LGS QAPD.	Editorial Additional Detail

Item No.	Paragraph Number	Description of Change	Change Classification
58.	17.2.1.2.5.12	For first sentence, deleted the words "including reports of assessment reviews" because they were redundant with the words later in the sentence which require NRB minutes to identify documents reviewed. At the end of the first sentence, changed "Board" to "NRB" for consistent word usage. For the second sentence, changed the parenthetical "normally within 10 working days following each meeting" to "normally within 14 days following each meeting." All of the above changes made for consistency with the LGS QAPD and LGS Tech Specs.	Editorial
59.	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 Functional
60.	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 ECR 96-02783
61.	17.2.2	Added Paragraph numbers 17.2.2.1 and 17.2.2.1.1 through 17.2.2.1.10 for the eleven previously unnumbered paragraphs of this section to facilitate cross-referencing by implementing documents. As a result, previously numbered 17.2.2.1 through 17.2.2.13 (and their subparagraphs) are now numbered 17.2.2.2 through 17.2.2.14 respectively, with the same subparagraph structure.	Editorial
62.	17.2.2.1 17.2.2.4 17.2.3.2.2 17.2.16.2.1	Changed "component, structure, or system" to "structure, system, or component" for consistency with the acronym "SSC" as utilized by implementing documents.	Editorial
63.	17.2.2.1.6	Changed "An overview of the QA Program is provided..." to "Oversight of PECO Nuclear's implementation of the QA Program is provided.." in order to use the correct word.	Editorial
64.	17.2.2.1.9	Changed "are" to "is" to make verb agree in number with subject.	Editorial
65.	17.2.2.2	Added "and meteorological monitoring" to the end of the list of activities in order to be consistent with paragraph 17.2.1.2.3.a	Editorial Consistency
66.	17.2.2.2.2	Changed "Appendix A to Section 17.2 of this UFSAR describes..." to "Appendix 17.2A of this Section 17.2 describes..." because the appendix is numbered as Appendix 17.2A, not Appendix A.	Editorial

Item No.	Paragraph Number	Description of Change	Change Classification
67.	17.2.2.3	Changed "The QA program shall be reviewed to determine the status and adequacy by the Director, NQA, and the Plant Manager, on a continuing basis and the NRB annually in order to determine..." to "The QA program shall be reviewed on a continuing basis by both the Director, NQA, and the Plant Manager to evaluate its status and adequacy, and by the NRB on an annual basis in order to determine..." for better understanding and clarification.	Editorial
68.	17.2.2.3.1	Changed "receipt of Quality Assurance Assessment Reports, Surveillance Reports, and Corrective Action Requests" to "receipt of NQA assessment reports, surveillance reports, and corrective action requests (PEP issues)" to clarify that corrective action requests are now processed as PEP issues and to correct unneeded capitalization.	Programmatic Editorial
69.	17.2.2.4	Changed "radiological and environmental monitoring" to "radiological environmental monitoring." Also added meteorological monitoring to the list of activities to be consistent with paragraph 17.2.1.2.3.a	Editorial Consistency
70.	17.2.2.8	Revised sentence from "Resolutions resulting from differences of opinion regarding deficiencies or noncompliances identified from assessments, surveillances or verifications by NQA shall be made by the President of PECO Nuclear and Chief Nuclear Officer" to "Differences of opinion regarding deficiencies or noncompliances identified by NQA assessments, surveillances, or verifications shall be resolved by management. Changed made for better wording and to allow for all levels of PECO management to resolve differences of opinion that involve NQA-identified deficiencies.	Editorial
71.	17.2.2.10	Added the following sentence to existing content: "Administrative procedures shall control the preparation, review, approval, and distribution of these documents." Addition made to be consistent with the LGS QAPD.	Additional Detail Editorial
72.	17.2.2.10.1	Added the following words to the end of the sentence: "and in compliance with necessary prerequisites." Addition made to be consistent with the LGS QAPD.	Additional Detail Editorial
73.	17.2.2.11	Changed "NRC issuances" to "NRC issues" to be consistent with revised paragraph 17.2.1.2.3.2.1.	Editorial Consistency
74.	17.2.3.2.1	Added to the end of the paragraph the sentence "In all cases, design verification shall be completed prior to relying upon the structure, system, or component to perform its safety function." in order to be consistent with the LGS QAPD. Also changed "those cases where timing cannot be met" to "those cases where this timing cannot be met" in order for the sentence to make better sense. Also changed "prior to the release" to "prior to release."	Consistency Editorial



Item No.	Paragraph Number	Description of Change	Change Classification
75.	17.2.3.2.3	Changed "PECO Energy follows Regulatory Guides and ANSI Standards, specifically Regulatory Guide 1.64..." to "PECO Nuclear's QA Program for the design of PBAPS shall comply with Regulatory Guide 1.64..." in order to provide the purpose for invoking the specific Reg. Guide and ANSI standard.	Clarification
76.	17.2.3.3	Revised the sentence that previously read "Instructions for the design of modifications are written to require compliance to regulatory requirements as defined in 10CFR50.2, 10CFR50.59, and as defined in the license application in accordance with the design bases of the structures, systems, or components." to now read "Controls for the design of modifications to structures, systems, or components that are important to safety 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.	Clarification Editorial
77.	17.2.3.3.3	Changed the words "divisions of the" to "organizations within" to accommodate PECO Nuclear organizational units other than divisions which may perform design reviews. Also changed "PBAPS administrative procedures or engineering procedures" to "PECO Nuclear procedures" to accommodate the fact that the engineering design process is now fully described by Common Nuclear Procedures.	Functional Editorial
78.	17.2.3.4.1	Changed "Administrative procedures shall be written which require that modification be reviewed..." to "Administrative procedures shall require that modifications be reviewed..." to capture the fact that these administrative procedures are already written.	Editorial
79.	17.2.4.1	Changed "in accordance with PBAPS administrative procedures" to "in accordance with PECO Nuclear procedures" in order to accommodate the preparation of procurement documents using Common Nuclear Procedures.	Clarification
80.	17.2.4.1.1	Revised "procured in accordance with administrative and department unique procedures." to "procured in accordance with PECO Nuclear procedures." in order to accommodate the procurement of plant items and services using Common Nuclear Procedures.	Clarification
81.	17.2.4.2	Changed the ending of the first sentence from "for a safety-related item." to "for a safety-related item or service." in order to clearly establish the procurement requirements of the sentence for both plant items and services. Also, broke the extremely long second sentence into two sentences, ending the first new sentence at "applied to the procurement document." Also made the word "specification" plural in this new smaller sentence. For the new third sentence, revised the wording slightly to read "The member also determines special controls to be applied, such as vendor controls, hold points, tests to be performed, along with acceptance or rejection criteria..."	Clarification
82.	17.2.4.4	Revised the cross reference to paragraph 17.2.17.1.2.	Editorial



Item No.	Paragraph Number	Description of Change	Change Classification
83.	17.2.4.5	Changed middle of sentence from "...establishing, maintaining, revising, and issuing an 'Evaluated Vendors List' for PECO Energy nuclear power plants." to "...establishing and maintaining an Evaluated Vendors List for nuclear power plants operated by PECO Energy." to be consistent with the fact that the EVL is a PIMS database accessible to all and is no longer issued as a document. Change also made to accommodate possible utilization of the EVL for other facilities. Also removed unneeded quotation marks around Evaluated Vendors List.	Editorial Clarification
84.	17.2.4.7	Revised the entire sentence from: "Nuclear Generation Group Supply Management shall process 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." Revised to accommodate organizational name change, to allow any authorized PECON organization to process requisitions, and for clarity.	Organizational Editorial
85.	17.2.4.7.1	Revised sentence from "Nuclear Generation Group Supply Management shall not alter the technical information or quality assurance requirements on a requisition for any Quality Program Item without, specifically requested prior, written approval of the requisitioning organization." 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 organization." Revision made to make the prohibition applicable to everyone, not just Supply Management. Also revised to improve clarity, use terms consistently, and make the text consistent with the LGS QAPD.	Editorial
86.	17.2.4.9	Inserted the following new paragraph: "The procurement document shall require the vendor to obtain PECO Nuclear approval when procurement requirements are not met." This requirement is moved from former paragraph 17.2.7.2.1 and expanded to address all incidents where the procurement requirements are not met. Relocation made because topic is more applicable to Criterion IV than to Criterion VII. Former paragraph 17.2.4.9 renumbered as 17.2.4.10.	Editorial
87.	17.2.5.1	Changed beginning of second sentence from "Programmatic controls and processes described in item 4 of UFSAR Appendix 17.2A are in place..." to "Programmatic controls and processes described by Appendix 17.2A, item 4, are in place..."	Editorial
88.	17.2.5.1.1	Changed sentence from "PBAPS administrative procedures shall be written by the plant staff, reviewed by PORC, approved by the Plant Manager or an appointed designee, and..." to "PBAPS administrative procedures shall be written by PECO Nuclear personnel, reviewed in accordance with Paragraph 17.2.5.2.1 and..." Revision made to accommodate preparation of some common administrative procedures by personnel who are not assigned to the Station and to eliminate inconsistency with paragraph 17.2.5.2.1.	Clarification ECR 96-02783

Item No.	Paragraph Number	Description of Change	Change Classification
89.	17.2.5.2.2	Revised sentence to read: "Recording documents such as log books, work request forms, check-off lists, data sheets, or databases shall be used, when appropriate, to document compliance with the instructions, procedures, and drawings." Added databases as a type of recording document and added "when appropriate" to accommodate the fact that not every activity requires a recording document.	Clarification
90.	17.2.5.3	Deleted this paragraph altogether because it was redundant to 17.2.5.1.1 and 17.2.5.1.2. Renumbered the two paragraphs that follow.	Editorial
91.	17.2.5.4 (formerly 17.2.5.5)	Revised step from "...by individuals within the responsible organization. This review shall be controlled..." to "...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..." Revision made to be consistent with previously approved submittal to NRC.	Programmatic Clarification EOR 96-02076
92.	17.2.6.1	Added the words "documents such as" before the words "instructions, procedures, and drawings" to broaden the applicability of the document control requirement. Also removed the last sentence stating that document distribution is to predetermined responsible personnel in order to be consistent with current document control policy which requires personnel to confirm through PIMS that they are using the current revision of the documents that control or affect their work activities.	Editorial Clarification
93.	17.2.6.3.	Revised end of first sentence from "in accordance with the PBAPS administrative procedures under the authority of the Plant Manager or an appointed designee" to "in accordance with administrative procedures under the authority of designated responsible management. Change made to be consistent with PECO Nuclear use of Common Nuclear Procedures to control most instructions, procedures, and drawings. Also deleted the list of various quality-related activities at the end of the paragraph because the list is redundant with earlier lists of quality-related activities.	Editorial Clarification
94.	17.2.6.3.1	Revised the sentence from "The control of documents apply to..." to "Document control applies to..." to correct the grammatical error and to improve readability.	Editorial
95.	17.2.6.4	Revised the statement to be consistent with current Document Control policy which requires personnel to confirm through PIMS that they are using the current revision of the various sections of the Tech Specs and the UFSAR, including posted changed paper.	Clarification
96.	17.2.6.5	Revised beginning of sentence from "Those participating in an activity shall be made aware of..." to "Those participating in an activity are aware of..." to accommodate the current status that such personnel have already become familiar with the documents applicable to their assigned tasks.	Clarification

Item No.	Paragraph Number	Description of Change	Change Classification
97.	17.2.7.1.1 17.2.7.1.2	Removed unneeded quotation marks enclosing the terms "Evaluated Vendors List" and "Evaluated Vendors."	Editorial
98.	17.2.7.1.2	Added wording to indicate that nuclear utilities do not need to be included on the PECO EVL.	Clarification
99.	17.2.7.1.5	Revised sentence from "Vendors that are on the 'Evaluated Vendors List' are assessed triennially by NQA commensurate with the importance, complexity, quantity of the product or services 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 the product or services being purchased," therefore, these words were deleted from the end of the sentence.	Clarification Editorial
100.	17.2.7.2.1	Deleted this step because its content (requiring purchase documents to identify the types of vendor NCR dispositions that require PECO Nuclear approval) is now addressed by 17.2.4.8.	Editorial
101.	17.2.9.1.3	Changed the beginning of the sentence from "Certification of welders is" to "Certifications of welders are."	Editorial
102.	17.2.9.1.2	Revised beginning of sentence from "The nondestructive examination procedures for the ISI/IST Inspection Programs are written..." to "The nondestructive examination procedures for the In-Service Inspection are written..." in order to make the wording consistent with the LGS QAPD.	Editorial
103.	17.2.9.2.1	Revised the beginning of the sentence from "NDE procedures require that personnel performing tests be qualified in accordance with.." to "NDE procedures require that personnel performing these examinations be qualified and certified in accordance with.." in order to make the wording consistent with the LGS QAPD.	Editorial
104.	17.2.10.2	Revised the beginning of sentence from "The inspection program for modifications and maintenance work shall be accomplished by qualified NQA personnel independent of..." to "Quality Verifications (QVs) for modifications and nonroutine maintenance work shall be accomplished by qualified NQA personnel who are independent of..." in order to be consistent with paragraph 17.2.2.1.4 and the LGS QAPD.	Clarification Consistency
105.	17.2.10.4	Changed the beginning of the sentence from "Personnel performing quality verifications" to "Personnel performing verifications" to broaden the requirement to all personnel (not just NQA personnel) who perform verifications to be qualified. Revised the second sentence from "Certifications of inspector qualifications are maintained" to "Certifications of inspector qualifications for QV personnel are maintained" in order to clarify that it is NQA's QV personnel who require certification as inspectors.	Clarification

Item No.	Paragraph Number	Description of Change	Change Classification
106.	17.2.10.6	Changed second sentence from "These original inspection procedures, or updated or modified inspection requirements made necessary or desirable due to changes in the state of the art or upgraded Codes and Standards, are followed in the implementation of modifications." to "These original inspection criteria may be updated or modified as necessary or desirable due to changes in the state of the art or upgraded Codes and Standards." Revision made to clarify that the acceptance criteria may change over time, and the design basis shall be accordingly updated. To state that inspection procedures may be revised is trivial. Also revised for better understanding of the sentence.	Clarification Editorial
107.	17.2.11.1	Edited first sentence of paragraph by splitting it into two sentences to improve readability and to be consistent with the wording in the LGS QAPD. Used the term "structure, system, component" instead of "item" and added the words "drawings, specifications, or installation procedures" after the words "written test procedures." Moved the last sentence and renumbered it as paragraph 17.2.11.1.2. Previous 17.2.11.1.1 moved and renumbered as 17.2.11.1.3. In place of previous 17.2.11.1.1, added a new sentence stating "The program for the control of testing shall be established in accordance with administrative procedures." At the end of the new 17.2.11.1.2 added the sentence "Where appropriate, vendor documents and instructions shall be used as input for determining required tests." New content added to be consistent with the LGS QAPD. Previous 17.2.11.1.2 renumbered as 17.2.11.1.4.	Editorial Additional Detail Consistency
108.	17.2.11.3	Inserted the following paragraph which was moved from section 17.2.14 because its content is better placed here and for consistency with the LGD QAPD: "The PBAPS Technical Specifications, Technical Requirements Manual, Offsite Dose Calculation Manual, and UFSAR establish the requirements for the safe operation of the plant, including provisions for periodic and non-periodic tests and inspections of various structures, systems, and components. Periodic tests are those tests delineated in the PBAPS Surveillance Testing Activity and non-periodic tests are those proof tests which are performed following modifications or maintenance." Paragraphs previously numbered 17.2.11.3 through 17.2.11.10 are renumbered as 17.2.11.4 through 17.2.11.11.	Consistency Editorial Additional Detail
109.	17.2.11.4 (formerly 17.2.11.3)	Revised sentence from "Overall control of tests is accomplished by the Shift Operations personnel in order to assure that components, systems, and instruments being tested do not affect the safe operation of the plant" to "Overall control of tests affecting plant operations is accomplished by Shift Operations personnel to assure that testing of components, systems, and instruments does not adversely affect the safe operation of the plant." Revision made to make wording consistent with the LGS QAPD.	Editorial
110.	17.2.11.11 (formerly 17.2.11.10)	Revised beginning of sentence from "Measures shall be established..." to "Measures are established..." to accommodate the current status of program	Editorial



Item No.	Paragraph Number	Description of Change	Change Classification
111.	17.2.13.3.2	In the first sentence change the word "delineated" to "established." Changed the second sentence in its entirety from "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 remain secure and legible." Change made to improve readability and clarity and for consistency with the LGS QAPD.	Editorial
112.	17.2.14.4	Added the words "where practicable" to accommodate that in some cases, physical segregation at the receiving location of items for which receipt inspection has not been completed is not always possible. No change in intent; change is also consistent with new 17.2.15.1.a.	Clarification
113.	17.2.14.4	Provided an option to control defective installed items by means other than tagging to indicate operating status. Change made to be consistent with the LGS QAPD.	Editorial
114.	17.2.14.6	Moved this paragraph to section 17.2.11; renumbered as 17.2.11.3; see comment above. Also added wording to indicate that the ODCM, Technical Requirements Manual, and UFSAR, in addition to the Tech Specs, establish requirements for the safe operation of the plant. Previous 17.2.14.7 now renumbered as 17.2.14.6.	Clarification ECR 96-02783
115.	17.2.15.1	For first sentence, deleted the words "by means of administrative procedures" because it would be redundant with new 17.2.15.3. Deleted the second sentence in its entirety because it provided details that were not necessary at this point in the discussion of the program to control nonconforming items. Shortened the last sentence to "The measures address the following functions." Revised for simplification and consistency with the LGS QAPD.	Editorial Consistency
116.	17.2.15.1.a	Added the following clarifying sentence: "As a guideline, control of nonconforming items by tagging, marking, or other means of identification is acceptable where physical segregation is not practicable, although physical segregation and marking are preferred." Change made for consistency with the LGS QAPD.	Editorial Consistency
117.	17.2.15.1.b	Replaced the entry for segregation of nonconforming items with an entry requiring a "Description of the nonconforming condition(s). Segregation is now adequately addressed by revised 17.2.15.1.a. Added the requirement to describe the nonconforming conditions to be consistent with the LGS QAPD.	Editorial Consistency



Item No.	Paragraph Number	Description of Change	Change Classification
118.	17.2.15.1.c	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. Personnel performing evaluations to determine a disposition shall have demonstrated competence in the specific area they are evaluation, have an adequate understanding of the requirements, and have access to pertinent background information. Nonconforming items may be dispositioned in any of the following methods." Second sentence above was relocated from previous 17.2.15.1.d. Change made for consistency with LGS QAPD.	Editorial Consistency
119.	17.2.15.1.c.1 through 17.2.15.1.c.4	Replaced four previous disposition categories with five new disposition categories that are consistent with the terms used by 10CFR50 Appendix B. Primary change is the term "restoration" is replaced with the terms "repair" and "rework." As a result, the new 17.2.15.c.1 states "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." New 17.2.15.c.2 discussed the repair disposition as follows: "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 Consistency
120.	17.2.15.1.c.3 [formerly 17.2.15.c.(2)]	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.	
121.	17.2.15.1.c.4 [formerly 17.2.15.c.(3)]	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 added the following sentences: "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." Added additional requirements to document the duration of anticipated interim use and the compensatory measures to be taken, if any.	Clarification
122.	17.2.15.1.c.5 [formerly 17.2.15.c.(4)]	Changed "Acceptance for use as is" to Accept the item "as is." for consistency in sentence structure. Also added the sentence: "Provide the engineering rationale/justification and independent review for a "use-as-is" disposition." in order to be consistent with the requirement applied to the "interim us-as-is" disposition and to be consistent with the LGS QAPD	Clarification
123.	former 17.2.15.1.d.	Moved this requirement to the end of the new 17.2.15.1.c	Editorial

Item No.	Paragraph Number	Description of Change	Change Classification
124.	New 17.2.15.1.d	Added the following paragraph to be consistent with the LGS QAPD: "Notification to station management and other responsible organizations of equipment malfunctions or deviations. The notification system shall include provisions for initial and follow-up information until the item is finally dispositioned."	Additional Detail
125.	17.2.15.1.e	Revised the entry from "Procedures require documentation of each of the above items from identification to final disposition. Reviews and approvals of the above are delineated in appropriate procedures." to "Documentation of the nonconforming item: from initial identification to completion of corrective action." Discussion of reviews and approvals is moved to 17.2.15.5. Changes made for consistency with the LGS QAPD.Revision.	Editorial
126.	17.2.15.2, 17.2.15.2.1 and 17.2.15.2.2	Inserted three paragraphs dealing with vendor nonconformances. First new paragraph requires PECO procurement documents to require vendors to report deviations from the purchase order requirements. Second new paragraph requires PECO Engineering to evaluate and approve vendor corrective actions for use-as-is and repair dispositions to vendor-initiated NCRs. Third new paragraph discusses deficiencies identified by PECO during source surveillances. Paragraphs added for consistency with the LGS QAPD. Paragraph formerly numbered as 17.2.15.2 is now 17.2.15.3.	Additional Detail
127.	17.2.15.3	Changed first sentence from "Nonconforming materials, parts, or components identified during receipt inspection are tagged, segregated, and controlled in accordance with administrative procedures to prevent their inadvertent use." to "Nonconforming items identified during receipt inspection are tagged, reported, and dispositioned in accordance with administrative procedures." Segregation is discussed by 17.2.15.1.a. Deleted second sentence which discusses use of the "HOLD for Clearance" tag which is detail provided by the applicable administrative procedures.	Editorial
128.	Former 17.2.15.4	Deleted the following sentence because it would be redundant with the new 17.2.15.1.d: "Identified Nonconforming materials, parts, or components shall be reported to Station Management in accordance with applicable procedures."	Editorial
129.	17.2.15.4	Inserted the following new paragraph to be consistent with the LGS QAPD: "Nonconforming items identified during installation activities and post-installation testing activities shall be identified and reported in accordance with administrative procedures."	Additional Detail

Item No.	Paragraph Number	Description of Change	Change Classification
130.	17.2.15.5 (formerly 17.2.15.3)	At the end of the first sentence changed "the Peach Bottom" to "PBAPS" for consistent use of acronym. Changed the second sentence from "However, when the non-conformity is due to the lack documentation and , where technical adequacy is demonstrated to PECO Nuclear's satisfaction, some nonconforming materials, parts, or components may be permitted for installation." to "Where technical adequacy is demonstrated to PECO Nuclear's satisfaction, use of some nonconforming materials, parts, or components may be permitted. In no case will use of nonconforming materials, parts, or components be permitted if a hazard to the health and safety of the public could result from their use. Revised the last sentence from "Administrative procedures identify the responsible individual and authority for disposition and approval of nonconforming materials, parts, or components." to "Administrative procedures shall delineate acceptance and approval mechanisms for permitting use of nonconforming materials, parts, or components." Changes made to be consistent with the wording of the LGS QAPD.	Editorial
131.	17.2.15.6 (former 17.2.15.5)	Relocated the topic of the first two sentences (review and trend analysis of nonconformances) to new 17.2.15.7. For the last sentence, changed the beginning of the sentence from "Reviews are performed" to "Nonconformance reports are reviewed." At the end of the sentence added the words "in accordance with administrative procedures." Changes made for consistency with the LGS QAPD.	Editorial
132.	17.2.15.7 (formerly part of 17.2.15.5)	Second sentence of former 17.2.15.5 relocated to 17.2.15.7. First sentence of former 17.2.15.5 no longer needed because it is now incorporated into the new 17.2.15.6 (in accordance with administrative procedures).	Editorial
133.	17.2.15.5 (formerly 17.2.15.7)	Revised last 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." in order to be consistent with the wording of the LGS QAPD.	Editorial
134.	17.2.15.11	Added the following new requirement in order to be consistent with the LGS QAPD: "PECO Nuclear shall report abnormal occurrences and unusual events to the USNRC as required by NRC Regulations and PBAPS Technical Specifications."	Addition Detail
135.	17.2.16.1	Deleted from the first sentence the words "by means of administrative procedures" because of redundancy with 17.2.16.4. Changed second sentence from "PECO Nuclear defines conditions adverse to quality as failures..." to "Conditions adverse to quality are failures..." For the last sentence removed the words "are consistent with their importance to safety and" because the relevant importance to safety is inherent in the discussion that follows.	Editorial
136.	17.2.16.1.a	Added the word "significant" before "conditions adverse to safety" to address the concept of relevant importance to safety.	Editorial
137.	17.2.16.1.b	Added specific requirement to report significant CAQs to PORC and the NRB in order to be consistent with the LGS QAPD.	Additional Detail

Item No.	Paragraph Number	Description of Change	Change Classification
138.	17.2.16.2	Revised the first sentence from "The responsibility for the above is assigned to a cognizant staff member in the affected activity." to "The above responsibilities are assigned to staff members responsible for the various activities. Deleted the second sentence dealing with identification of root cause, correcting CAGs, and informing Station Management because the sentence content was redundant with 17.2.16.3 and 17.2.16.4.	Editorial
139.	17.2.16.3	Broke the paragraph into two sentences by changing "NQA through its activities may identify conditions which require corrective action and shall report these conditions to Station Management for corrective action in accordance with applicable procedures." to "NQA may identify conditions which require corrective action. Such conditions shall be reported to responsible management for corrective action in accordance with applicable procedures." Change made to improve readability and for consistency with the LGS QAPD.	Editorial
140.	17.2.16.4	Relocated former 17.2.16.7 to here for better placement and for consistency with the LGS QAPD. Changed the beginning of the introductory sentence from "Procedures shall be established..." to "Procedures are established..." in order to accommodate the current status of QA Program. Former paragraphs 17.2.16.4 through 17.2.16.6 are renumbered as a result.	Editorial
141.	17.2.16.4.c (former 17.2.16.7.c)	Revised beginning of sentence from "The appropriate engineer shall review..." to "The appropriate engineer or designated individual shall review..." in order to accommodate review by staff personnel other than engineers.	Clarification Editorial
142.	17.2.16.5 (former 17.2.16.4)	Revised the beginning of the sentence from "The status of noncompliances and significant nonconformances identified by NQA shall be reported..." to "The status of conditions adverse to quality identified by verifications, assessments, or surveillances shall be reported..." for consistency with the LGS QAPD.	Editorial
143.	17.2.16.7	Edited the existing paragraph in order to achieve consistency with the LGS QAPD. 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 effectiveness 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



Item No.	Paragraph Number	Description of Change	Change Classification
144.	17.2.17.3	Added the following to the existing text: "It should be recognized that the naming of records may vary. For a record type not specifically listed below, identify the record type that most closely describes the record in question and establish the new record's retention period to match the listing below." This topic used to be addressed by former 17.2.17.6 but it was move here (and edited) for better placement.	Editorial
145.	17.2.17.3.1 17.2.17.3.2	Revised "five" to "5" and "ten" to "10" for consistent use of numbers in text.	Editorial
146.	17.2.17.4	Changed "Nuclear Records Management System" to "Nuclear Records Management Programs" in order to accommodate additional record systems used for tracking electronic records, which are not tracked by NRMS.	Clarification
147.	17.2.17.4.1	Revised sentence from "The records shall be stored in predetermined locations as necessary to meet the requirements of applicable standards, codes, and regulatory agencies." to "The records shall be stored in predetermined locations to prevent destruction of the records by fire, flooding, theft, and deterioration by environmental conditions as required by applicable standards, codes, and regulatory agencies." Revision made for consistency with the LGS QAPD.	Additional Detail
148.	17.2.17.5	Added the following sentence to the middle of the paragraph: "The procurement documents shall specify the records to be provided to PECO Nuclear, the time of submittal, and whether or not PECO Nuclear approval is required." Sentence added for consistency with the LGS QAPD.	Additional Detail
149.	17.2.17.5.1	Revised end of second sentence from "...submitted to the Document Services for inclusion in the Nuclear Records Management System." to "...submitted to Document Services for record retention."	Editorial
150.	17.2.17.6	The content of this paragraph has been moved to the end of 17.2.17.3.	Editorial
151.	17.2.17.6.1	Renumbered as 17.2.17.6. Beginning of sentence changed from: "NQA and other organizations responsible for records control..." to "Organizations responsible for records control..."	Editorial
152.	17.2.18.1.g.	Re-written to reflect NRC approval for assessment frequency change from annual to once every 2 years.	Programmatic ECR 96-01530
153.	Former 17.2.18.1.h and former 17.2.18.1.i.	Deleted based upon re-write of 17.2.18.g. As a result of these deletions, former steps 17.2.18.1.j through 17.2.18.1.m are now renumbered 17.1.18.1.h through 17.1.18.1.k. Also removed periods from all substeps except the new 17.2.18.1.g.	Editorial ECR 96-01530



Item No.	Paragraph Number	Description of Change	Change Classification
154.	New 17.2.18.1.h (Formerly 17.2.18.1.j)	Revised "The Radiological Environmental Monitoring Program and the results thereof to meet the provisions of Regulatory Guide 4.1, Revision 1, April 1975, 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." Change made because of broader scope of RG 4.15 which encompasses RG 4.1 and for consistency with the LGS QAPD	Editorial Additional Detail
155.	17.2.18.1.2	Changed end of first sentence from "in the areas audited" to "in the areas "assessed" in order to use the term "assessment" consistently.	Editorial
156.	17.2.18.1.4	Changed the sentence from "The assessment program and schedules shall be reviewed semi annually by the NRB." to "The assessment program and schedules shall be reviewed at least once every 6 months by the NRB to ensure that the assessments are being performed in accordance with this section." Change made to preclude any confusion over the term "semiannually" and to be consistent with the LGS QAPD.	Editorial
157.	17.2.18.1.5	Revised the designation for the ANSI standard to include ASME.	Editorial
158.	17.2.18.5	Revised the sentence from "The Director, NQA, or an appointed designee, is responsible to identify overdue corrective action of noncompliance to the appropriate responsible management." to "NQA monitors the status of required corrective actions and periodically reports overdue corrective actions to PECO Nuclear management." Change made to more accurately reflect the method by which NQA performs this activity.	Editorial
159.	17.2.18.6	Revised "Dependent upon such factors as" to "Dependent upon factors such as" in order to be consistent with the LGS QAPD.	Editorial
160.	Appendix 17.2A	Added the following introductory paragraph: 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. Addition made for consistency with the LGS QAPD.	Additional Detail Editorial
161.	Appendix 17.2A, Item 4	Changed beginning of last paragraph from "Line organizations that have responsibility for procedures or procedure categories will perform biennial self-assessments of..." to "At least once every 2 years line organizations that have responsibility for procedures or procedure categories will perform self-assessments of..." Revised to preclude confusion over meaning of biennial.	Editorial

Item No.	Paragraph Number	Description of Change	Change Classification
162.	Appendix 17.2A, Item 6.d	Revised the first sentence from "The rotating of certain electrical motors in storage, which must be energized to release an electrical brake, will be stored and maintained in accordance with manufacturers' recommendations." to "For electric motors in storage which must be energized to release and electric brake, shafts are periodically rotated as recommended by the manufacturer." Revision made for clarification and grammatical correctness.	Editorial
163.	Appendix 17.2A, Item 6.g and Item 19	Revised the designation for the ANSI standard to include ASME.	Editorial
164.	Figure 17.2.1 (Formerly Exhibit 1)	Updated Corporate Leadership Chart	Organizational ECR 96-02783
165.	Figure 17.2.2 (Formerly Exhibit II)	Updated Nuclear Group Organizational Chart	Organizational ECR 96-02783
166.	Figure 17.2.10 (Formerly Exhibit X)	Inserted a header to indicate that identified procedures constitute PECO Nuclear Administrative procedures. Also deleted NEDP series from Nuclear Engineering Procedures listing because all NEDPs have been superseded.	Clarification ECR 96-02783

## ATTACHMENT 2

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 these plant modifications and projects included in Revision 9 of the Peach Bottom Atomic Power Station (PBAPS) Units 2 and 3, Fire Protection Program (FPP) or Revision 14 of the PBAPS, Units 2 and 3, Updated Final Safety Analysis Report (UFSAR) that were not previously submitted in the 1995 or 1996 PBAPS Annual 10CFR50.59 Report. The list does not represent a complete list of UFSAR and FPP change packages incorporated.

<u>Modification Number</u>	<u>Unit Number</u>	<u>Description</u>
5385	2	Replacement and Upgrade of the Radwaste and Recombiner Radiation Monitoring System
5399	2&3	Replacement and Upgrade of Control System for the Auxiliary Boilers
P00055	2&3	Installation of Non-Safety Related Relays to Monitor the Output of Alternative Shutdown Panel Inverters
P00365	3	Installation of Pipe Taps to the Off Gas Sampling System
P00393	2&3	Replacement of Supports for Discharge Canal PH Probe Piping
P00459	2&3	Replacement of Air Operated Valves and Installation of Manual Maintenance Valves on Condensate Filter-Demineralizer System
P00475	2&3	Relocation of Oxygen Injection System Tap on the Suction Side of the Condensate Pump Suction Header
P00527	2	Installation of Manual Isolation Valves on High Pressure Coolant Injection System Steam Supply Drain Line
P00533	2	Installation of Charging Header for Hydraulic Control Units
P00558	2&3	Installation of Ultrapure Water Facility
P00575	3	Replacement of High Pressure Service Water Pump Motor
P00636	2&3	Intake Water System Upgrade

**UFSAR  
CHANGE  
PACKAGE**