

**PHILADELPHIA ELECTRIC COMPANY**

LIMERICK GENERATING STATION

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August 13, 1990

GRAHAM M. LEITCH  
VICE PRESIDENT  
LIMERICK GENERATING STATION

Docket No. 50-352  
License No. NPF-39

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

SUBJECT: Limerick Generating Station, Unit 1  
Revised Reply to a Notice of Violation  
NRC Inspection Report Nos. 50-352/90-13  
and 50-353/90-12

Dear Sirs:

Attached is a revised Philadelphia Electric Company reply to a Notice of Violation for Limerick Generating Station (LGS) Unit 1, which was contained in NRC Inspection Report Nos. 50-352/90-13 and 50-353/90-12 for LGS, Units 1 and 2, dated May 7, 1990. This Notice of Violation pertains to the failure to properly control documents affecting quality and was identified during an NRC inspection conducted between March 6 and April 9, 1990, at LGS Units 1 and 2.

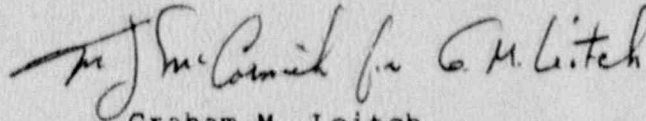
The attachment to this letter provides a restatement of the violation followed by our revised response. During the performance of the second audit of procedures as committed to in the original response, discrepancies in other controlled books were identified. We then recognized the need to revise this violation response to identify that the initial audit completed on May 10, 1990, was not sufficient to identify and correct deficiencies in the controlled copy procedure books. Furthermore, during review of the document control program by the new DAC Supervisor, additional deficiencies in other controlled documents (e.g. drawings) were identified. Therefore, this response is also being revised to include all of the corrective actions directed at these additional deficiencies. The changes are indicated by revision bar markers in the right hand margins.

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

Very truly yours,

A handwritten signature in cursive script that reads "for J. M. Cornish for G. M. Leitch". The signature is written in dark ink and is positioned above the typed name.

Graham M. Leitch  
Vice President, LGS

DMS/JLP:cah

Attachment

cc: T. T. Martin, Administrator, Region I USNRC  
T. J. Kenny, USNRC Senior Resident Inspector, LGS



Reply to a Notice of Violation

Restatement of the Violation

As a result of an inspection conducted on March 6 - April 9, 1990, and in accordance with NRC Enforcement Policy (10 CFR 2, Appendix C), the following violation was identified:

10 CFR 50, Appendix B, Criterion VI, "Document Control," requires that measures be established to control the issuance of procedures, including changes, which prescribe all activities affecting quality, and that these procedures, including changes, are distributed to the location where the prescribed activity is performed. These requirements are implemented by Administrative Procedure A-2, "Control of Procedures and Certain Documents."

Contrary to the above, on March 30, 1990, the Construction Building controlled procedures were found to not be maintained per A-2 in that there were obsolete procedure revisions, missing procedures, misfiled procedures and a missing volume of procedures.

This is a Severity Level V violation. (Supplement I)

RESPONSE

Admission of Alleged Violation

Philadelphia Electric Company (PECo) acknowledges the violation.

Background

From March 6, 1990, to April 9, 1990, the Limerick Generating Station (LGS) NRC Resident Inspectors conducted an inspection of the Document Control and Records Retention Programs for LGS. During their inspection, they issued one violation related to the Document Control Program. This violation concerned missing and misfiled controlled procedures, incorrect revisions of controlled procedures, and missing controlled procedure books identified in the Controlled Document Locations (CDL). Additionally, the Inspectors identified discrepancies with the Records Retention Program in that boxes of completed procedures were improperly stored, inspection of the PECo storage vault was not being properly performed, and periodic testing of the Bechtel storage vault fire protection system was not being performed at the established frequency.

Reason for the Violation

The cause of this violation as well as the identified discrepancies is the result of two principal factors. The first principal factor was insufficient management oversight to ensure that comprehensive programs existed in the areas of Document Control and Record Retention. The second principal factor was that the administrative controls were inadequate to ensure an effective controlled document usage and handling process.

Corrective Actions Taken and Results Achieved

After Plant Management was notified on March 30, 1990, by the NRC Resident Inspectors of the violation and discrepancies for the Document Control and Records Retention Programs, the following immediate corrective actions were implemented.

- o On March 31, 1990, a review of six of the largest CDLs at LGS was initiated. Approximately one-third of the procedures in these CDLs were reviewed to determine the extent of the problem. Discrepancies similar to those cited in the violation were identified in each CDL. Therefore, on April 2, 1990, an audit of procedures issued and controlled by LGS Document Administration Center (DAC) was initiated. The audit was completed by May 10, 1990, but discrepancies were identified in the master listing indicating that several CDLs were not audited. A second comprehensive audit was initiated and completed by July 31, 1990, to provide the assurance that all procedures controlled by LGS DAC and the master distribution list are being adequately maintained. All discrepancies identified during the second audit were corrected by July 31, 1990.
- o On April 12, 1990, a letter was issued from the LGS Support Manager, responsible for Document Control, to all LGS personnel providing instructions on the proper use and handling of the controlled documents in the CDLs.
- o On April 23, 1990, a letter was issued from the Support Manager to Site Management requesting their assistance to ensure the proper use of all controlled documents within their departments at LGS.
- o The boxes of completed procedures which were improperly stored were shipped to the PECO storage vault by April 6, 1990.
- o A complete audit of controlled copies of Technical Specifications (TS) books on site was completed by July 31, 1990. Prior to the audit we reevaluated the number



- of controlled copies of TS books significantly reduced the distribution and removed the deleted books. Obsolete pages, missing pages, and misfiled pages were discovered and immediately corrected.
- o A 100% audit of Technical Specification PORC Positions, a controlled document, is in progress and expected to be complete by August 15, 1990.
  - o A 100% audit of all as-built drawings is in progress and expected to be complete by August 17, 1990.
  - o The distribution of Nuclear Group Administrative Procedures at LGS will be reviewed and a 100% audit of all locations is expected to be complete by September 25, 1990.
  - o The Final Safety Analysis Report (FSAR) books at LGS have not been audited; however, distribution of the initial issuance of the Updated Final Safety Analysis Report is currently being performed. The distribution has been significantly reduced and the DAC will assume responsibility for all future updates. This eliminates the need to audit the FSAR books.
  - o Review and evaluation of documents including but not limited to Root Cause Analysis Manual, Industrial Safety and Health Manual, Testing and Laboratories Procedures, and Evaluated Chemicals/Materials List is being performed to determine the required level of control and the groups responsible for maintaining this information. This is expected to be complete by December 31, 1990.
  - o Administrative Procedure A-6.1, "Control of Vendor Manuals," was issued on July 24, 1990 to define the Vendor Manual Program.

#### Corrective Actions to Prevent Recurrence

To assure adequate oversight of all controlled documents at LGS, the following administrative controls and corrective actions will be implemented and completed. These corrective actions will prevent recurrence of the violation as well as the discrepancies addressed in Section 10 of this Inspection Report.

- o A random sampling methodology is being developed using Military Standard 105, "SAMPLING PROCEDURES AND TABLES FOR INSPECTION BY ATTRIBUTES." This periodic random sampling methodology will be performed on all the CDLs and will identify specific deficiencies, potential problem areas, and adverse trends in a timely manner. Follow up actions will

be developed for errors identified during the periodic random sampling based on the number and the severity of the errors. A procedure will be written to ensure this periodic random sampling methodology is performed on an established frequency. An "Administrative Guideline" (AG) will be written to describe how to perform the periodic random sampling methodology. The AG will be implemented through the above procedure. This random sampling methodology will be implemented by October 1, 1990. In the interim, a complete audit of procedures issued and controlled by LGS DAC was completed on July 31, 1990. This audit was initiated to provide additional assurance that all procedures controlled by LGS DAC are being adequately maintained. Another 100% audit to provide additional assurance that distribution schedules are correct and all procedures are accurate is expected to be completed by September 25, 1990.

This random sampling would identify discrepancies of the type identified in a previous Violation, 50-353/89-81-01. However, the corrective actions taken in response to that violation would not have prevented the discrepancies identified in this violation from occurring.

- o On April 2, 1990, the Document Administration Center (DAC) supervisor was reassigned to a staff function outside of the Document Control and Records Retention Program areas. The DAC supervisor was replaced on an interim basis by the Superintendent-Administration until a permanent replacement could be established. On May 21, 1990, a new DAC supervisor was appointed to assume the DAC responsibility. The new DAC supervisor previously worked at LGS as the Bechtel Document Control supervisor and has eleven years experience in this field. This individual will provide enhanced management oversight of the Document Control Program needed to ensure that these discrepancies will not recur.
- o General Employee Training (GET) will be revised to include a segment which emphasizes the responsibilities of all LGS personnel for proper use and handling of controlled procedures. The administrative guidance provided in the April 12 and April 23, 1990 letters, described previously, will also be addressed in this training. This item will be implemented by August 31, 1990.
- o A review of the current Document Control and Record Retention Programs is presently being performed by the new DAC supervisor. After this review is completed, a reference manual describing the DAC functions, responsibilities, and training requirements will be developed and reviewed with all current and future DAC personnel. This manual will be controlled and periodically reviewed by the DAC supervisor.



This item will be completed and implemented by December 31, 1990.

- o A revision to Administrative (A) Procedure A-46, "Maintenance of Plant Quality Assurance Records," and a new procedure A-46.1, "Nuclear Records Management," was issued on June 29, 1990. These procedures provide additional clarification on the Record Retention Program processes and define the responsibilities of the DAC personnel and of the personnel who interface with the DAC personnel regarding the storage of controlled documents.
- o Quarterly inspection of the PECO storage vault was a responsibility of the previous DAC supervisor who was reassigned on April 2, 1990, as a result of the previous document control problems. This function is now the responsibility of a clerk under the direction of the new DAC supervisor. The issue regarding this Inspection Report was reviewed and discussed with the new supervisor and clerk to stress the importance of performing inspections in accordance with all procedures.
- o Control of the Bechtel storage vault fire protection system has been fully assumed by the LGS Fire Protection group. Procedures RT-2-022-601-0 and RT-7-022-344-0 were issued on July 31, 1990 to assure that the fire protection system for this vault is properly tested. Functional testing of the detectors is performed on a six month frequency.
- o The existing method of distributing information from and to Nuclear Group Headquarters and Peach Bottom Atomic Power Station is being revised. All controlled documents will be distributed to a single point of accountability at each location. For LGS, this will be the DAC supervisor. Direct distribution to individuals from any of the three locations will be discontinued, providing better control and accountability for all documents. We expect this new process to be completely in place by December 31, 1990.

Previous Violations 50-352/87-05-01, and 50-352/87-19-01, and Section 2.2 of Inspection Report 50-352/90-02, discuss discrepancies with Category I red-lined (as-built) drawings. This sub-group of drawings is controlled by the Modification Coordination Section with procedure A-6, "Control and Distribution of Drawings, Manuals, and Drawing Logs," rather than the DAC personnel with procedure A-2. Because of this, the corrective actions identified for these items would not have precluded this violation from occurring.

Date When Full Compliance Was Achieved

Full compliance with procedures controlled by LGS DAC was achieved by July 31, 1990. Full compliance with onsite controlled copies of Technical Specifications books was achieved by July 31, 1990. Full compliance with Technical Specifications PORC Positions and as-built drawings will be achieved at the completion of ongoing audits that are expected to be complete by August 17, 1990. Full compliance with Nuclear Group Administrative Procedures at LGS is expected by September 25, 1990. Full compliance for other controlled documents will be achieved after determining the required level of control, the group responsible for maintaining such documents, and performing audits of these documents. This is expected to be complete by December 31, 1990.