



PECO NUCLEAR

A UNIT OF PECO ENERGY

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

July 1, 1996

Docket Nos. 50-352
50-353
50-277
50-278

License Nos. NFF-39
NPF-85
DPR-44
DPR-56

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

SUBJECT: Limerick Generating Station, Units 1 and 2
Peach Bottom Atomic Power Station, Units 2 and 3
Request for Approval to Change the Quality Assurance Program
Description by Changing the Fire Protection Assessment Frequencies

Gentlemen:

This letter is submitted in accordance with 10CFR50.54(a)(3), which requires prior NRC approval for any change which reduces the commitments in a previously accepted Quality Assurance Program Description (QAPD). The Quality Assurance Program is described in Appendix D of the Peach Bottom Atomic Power Station (PBAPS) Updated Final Safety Analysis Report (UFSAR) and Chapter 17.2 of the Limerick Generating Station (LGS) UFSAR. The QAPDs commit PECO Energy Company (PECO Energy) to perform three separate assessments of the Fire Protection Program. These assessments range in frequencies from once every 12 months to once every 36 months. PECO Energy is proposing to consolidate the three Fire Protection Assessment commitments described in the QAPDs into one commitment in each QAPD to be performed once every 24 months.

The proposed changes to the LGS and PBAPS QAPDs and their affected pages are provided in Attachments 1 and 2 respectively.

Assessment Description

The current Fire Protection Program assessment frequencies are based on NUREG-0123, "Standard Technical Specifications for General Electric Boiling Water Reactors", Section 6.5.2.8, "Audits", items h, i, and j. These assessment frequencies are described by Generic Letter 82-21, "Technical Specifications for Fire Protection Audits." Currently, these assessments are invoked by three commitments included in PBAPS QAPD, Rev. 13, Section 17.2.18.1.1 and LGS QAPD, Rev. 5, Section 17.2.18.6, as follows.

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ADD: NRC/DISP/EMS 1 1
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APP 6
Ltr. Encl.

Assessments of plant activities in the following areas shall be performed under the cognizance of the NRB:

- g. The Fire Protection Program and implementing procedures at least once every 24 months.
- h. An independent fire protection and loss prevention inspection and assessment shall be performed annually utilizing either qualified offsite PECO personnel or an outside fire protection firm.
- i. An inspection and assessment of the Fire Protection and Loss Prevention Program shall be performed by an outside qualified fire consultant at intervals no greater than thirty-six months.

The current sections of the PBAPS and LGS QAPDs were evaluated in accordance with 10CFR50.54(a)(3). No other references to Fire Protection assessment frequencies are described in the QAPDs or the Fire Protection Program. The affected pages of the LGS and PBAPS QAPDs are contained in Attachments 1 and 2 respectively.

Proposed Change to Assessments

PECO Energy requests approval of the consolidation of these commitments in the following areas.

The consolidation will change the frequency for the independent fire protection and loss prevention inspection and assessment from once every 12 months to once every 24 months. This frequency change is based on the fact that during the interval between fire protection assessments, an on-going surveillance is conducted to provide progressive assessments of functional performance.

The consolidation will change the frequency for the inspection and assessment of the Fire Protection and Loss Prevention Program performed by an outside qualified fire consultant from once every 36 months to once every 24 months. This change facilitates the commitment consolidation.

The frequency for the assessment of the Fire Protection Program and implementing procedures will remain the same.

Consolidation of the noted commitments will require that the Fire Protection Program and implementing procedures, including the inspection and assessment of the Fire Protection and Loss Prevention Program, be performed utilizing an outside qualified fire protection consultant at least once every 24 months.

Reason for the Change

The purpose for consolidating the commitments is for clarity, as well as appropriate allocation of assessment resources based on evaluation of plant functional area performance.

The consolidation is prompted by the guidance provided for assessment frequency by NRC Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance" under the Reviews and Audits section.

The consolidation of Fire Protection assessment commitments will result in an increase in the Quality Assurance Program effectiveness. Currently, the subject assessment area is regimentally scheduled for assessment on an annual basis without due consideration of the need for the assessment in view of performance as indicated by empirical data, events, and trends. This can result in an inappropriate allocation of assessment resources when other areas are in need of an assessment as indicated by performance data.

Assessment activities, to be effective, must be performed on a frequency commensurate with their safety significance, and with due consideration of performance data. The change in frequency for the noted assessment areas to at least once every 24 months will enable NQA management to schedule Fire Protection assessments and allocate personnel resources based on performance data. This mode of operation is substantiated by the fact that during the interval between assessments, an on-going surveillance is conducted to provide for progressive assessment of functional performance.

The overall net effect of this change is that over a six-year period at least three assessments (all involving an outside fire protection consultant) will be required. Currently, six assessments (two involving outside consultants) are required.

Program Continues to Satisfy Criteria

The proposed change to the assessment frequencies will continue to satisfy 10CFR50, Appendix B and will be adequately described in the respective QAPDs. The purpose, scope, and thoroughness of the current Fire Protection assessments will not be affected by the change. Management oversight of the assessment process will not be diminished by the change.

Changing the frequency of the independent fire protection and loss prevention inspection and assessment to at least once every 24 months does constitute a reduction in commitment relative to the frequency as described in the QAPDs. However, this change will not reduce the effectiveness of the Quality Assurance Program, nor will this change reduce the PECO Energy commitment to quality or to compliance with 10CFR50, Appendix B on the following basis:

1. The Fire Protection assessment will be scheduled based on empirical performance data such as trends, events, and surveillance results.

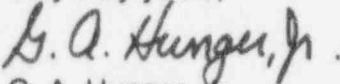
2. On-going surveillance is conducted during the 24-month frequency interval that provide for progressive assessment of functional performance.
3. The allocation of assessment resources will be based upon performance data and thereby provide for timely assessment coverage of areas which warrant oversight attention.

Conclusion

The proposed change in assessment frequency does constitute a reduction in commitment as described in the QAPDs. This reduction requires NRC approval prior to implementation pursuant to 10CFR50.54(a)(3). The effectiveness of satisfying 10CFR50, Appendix B, requirements will not be reduced as a result of the change.

Because approval of this change would improve resource allocation and the effectiveness of the Fire Protection assessment, we request the NRC's prompt attention to approve these changes. If you have any questions or need additional information, please contact us.

Very truly yours,



G. A. Hunger, Jr.
Director-Licensing

Attachments

cc: T. T. Martin, Administrator, Region I, USNRC
W. L. Schmidt, Senior Resident Inspector, PBAPS, USNRC
N. S. Perry, USNRC Senior Resident Inspector, LGS
R. R. Janati, Commonwealth of Pennsylvania

ATTACHMENT 1

LGS UFSAR

LGS UFSAR

17.2.18.6

Assessments of plant activities in the following areas shall be performed under the cognizance of the NRB:

- a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions at least once every 24 months.
- b. The performance, training, and qualifications of the operating staff at least once every 24 months.
- c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems, or method of operation that affect nuclear safety at least once every 24 months.
- d. The performance of activities required by the operational QA Program to meet the criteria of 10CFR50, Appendix B, at least once every 24 months.
- e. The emergency and implementing procedures at least once every 12 months.
- f. The Security Plan and implementing procedures at least once every 12 months.
- ~~g. The Fire Protection Program and implementing procedures at least once every 24 months.~~
- ~~h. An independent fire protection and loss prevention inspection and assessment shall be performed annually utilizing either qualified offsite PECO personnel or an outside fire protection firm.~~
- ~~i. An inspection and assessment of the Fire Protection and Loss Prevention Program shall be performed by an outside qualified fire consultant at intervals no greater than thirty six months.~~
- new g. The Fire Protection Program and implementing procedures, including an inspection and assessment of the Fire Protection and Loss Prevention Program, shall be performed utilizing an outside qualified fire protection consultant at least once every 24 months.
- ‡ h. The Radiological Environmental Monitoring Program and the results thereof at least once per 24 months.
- * i. The Offsite Dose Calculation Manual and implementing procedures at least once per 24 months.
- ± k. The Process Control Program and implementing procedures at least once per 24 months.

ATTACHMENT 2

PBAPS UFSAR

- 17.2.17.6 Types of quality records with minimum retention periods are listed in Section 17.2.17.3. It should be recognized that the nomenclature of these records may vary. For records not listed in Section 17.2.17.3, the type most nearly describing the record in question should be followed with respect to its retention period.
- 17.2.17.6.1 NQA and other organizations responsible for records control are defined in the administrative and implementing procedures.
- 17.2.17.7 Original design, manufacturing, and installation records and specifications shall be controlled and maintained.
- 17.2.18 Assessments
- 17.2.18.1 Assessment Program
- 17.2.18.1.1 Assessments of plant activities in the following areas shall be performed under the cognizance of the NRB.
- a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions at least once every 24 months.
 - b. The performance, training, and qualifications of the operating staff at least once every 24 months.
 - c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems, or method of operation that affect nuclear safety at least once every 24 months.
 - d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of 10CFR50, Appendix B, at least once every 24 months.
 - e. The Emergency Plan and implementing procedures at least once every 12 months.
 - f. The Security Plan and implementing procedures at least once every 12 months.
 - ~~g. The Fire Protection Program and implementing procedures at least once every 24 months.~~

~~h. An independent fire protection and loss prevention inspection and assessment shall be performed annually utilizing either qualified offsite PECO Energy personnel or an outside fire protection firm.~~

~~i. An inspection and assessment of the Fire Protection and Loss Prevention Program shall be performed by an outside qualified fire consultant at intervals no greater than 36 months.~~

new g. The Fire Protection Program and implementing procedures, including an inspection and assessment of the Fire Protection and Loss Prevention Program, shall be performed utilizing an outside qualified fire protection consultant at least once every 24 months.

‡ h. 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.

* i. The Offsite Dose Calculation Manual and implementing procedures at least once per 24 months.

‡ j. The Process Control Program and implementing procedures at least once per 24 months.

⊞ k. Any other area of facility operation considered appropriate by the NRB or the Senior Vice President and Chief Nuclear Officer.

17.2.18.1.2 Assessments shall include verification of compliance and effectiveness of implementation of programs, procedures, regulations, and license provisions in the areas audited. Written reports of such assessments shall be transmitted for appropriate action to supervisors having responsibility in the areas assessed.

17.2.18.1.3 Assessments shall be performed by NQA personnel or by specially selected groups or individuals who have no immediate responsibility for the activity they assess and do not, while performing the assessment, report to a management representative who has immediate responsibility for the activity being assessed. Timely follow-up action, including re-assessment where appropriate, shall be taken when deficiencies are noted.

17.2.18.1.4 The assessment program and schedules shall be reviewed semi-annually by the NRB.