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JOSEPH W. GALLAGHER
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(215) 841-5003

September 17, 1979

Re: Docket Nos.: 50-277
50-278

Inspection No.: 50-277/79-12
50-278-79-14

Mr. Eldon J. Brunner, Chief
Reactor Operations and Nuclear Support Branch
U.S. Nuclear Regulatory Commission
Region 1
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Brunner:

Your letter of August 27, 1979 forwarded combined Inspection Reports 50-277/79-12 and 50-278/79-14. Appendix A to your letter addresses three items which did not appear to be in full compliance with Nuclear Regulatory Commission requirements. These three items are categorized as infractions and are restated below with our response.

- A. Technical Specification Tables 4.2.A, 4.2.B, 4.2.C and 4.2.D specify that a Logic System Functional Test is required every six months for Containment Isolation System components.

Technical Specifications 1.0 "Surveillance Frequency" states, in part, the "Periodic surveillance tests, checks, calibrations, and examinations shall be performed within the specified surveillance intervals. These intervals may be adjusted plus or minus 25%..."

Contrary to the above, surveillance for the Primary Containment Isolation Systems Logic Systems Functional Test for Unit 3 was not performed within

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the required six months interval. ST 1.3 (Unit 3), which implements the above functional test, was last performed on August 11, 1978 and appears not to have been subsequently performed as required.

Response

This infraction is the result of a misunderstanding in the interpretation in the "once per six month" test frequency. This test frequency was interpreted to mean that testing must be performed once during each calendar half year. As a result of this inspection, the meaning of "once per six month" has been re-interpreted to mean the test must be performed at six month intervals plus or minus 25%. The once per six month surveillance tests have been rescheduled to reflect this interpretation.

- B. Technical Specification 6.8.1 states in part "Written procedures and administrative policies shall be established, implemented and maintained that meet the requirements of Sections 5.1 and 5.3 of ANSI N18.7 - 1972 and Appendix "A" of USAEC Regulatory Guide (R.G.) 1.33 (November 1972) . . ."

Paragraph 5.3.6 of ANSI N18.7 - 1972 states in part "Procedures shall be provided for periodic calibrations and testing of safety related plant instrumentations..."

Paragraph H.1 of Appendix "A" to R.G. 1.33 - 1972 states in part "Procedures of a type appropriate to the circumstances should be provided to assure that tools, gauges, instruments, controls, and other measuring and testing devices are properly controlled, calibrated, and adjusted at specified periods to maintain accuracy..."

Contrary to the above, it appears that the above calibration program has not been adequately implemented in that for three (3) calibrations previously identified and, for which procedures had been written, the calibrations had not been performed; that, for two (2) calibrations previously identified, no procedures have been written and/or issued; and, that for four (4) areas identified during the inspection as needing calibration, the need to calibrate associated instruments had not been identified.

Response

This infraction results from an administrative oversight within the newly formalized program for testing and calibration of instruments not specified in the Technical Specifications, but

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related to overall nuclear plant safety. This testing and calibration program is the result of previous NRC Inspection Reports 50-277/77-02 and 50-277/77-04. This NRC inspection identified the need to formalize this program to conform to NRC guidelines. The formalized program required the generation of approximately 1400 procedures. As the procedures were written and approved by PORC, they were then scheduled to be performed. The actual testing and calibration of the instruments was scheduled to be completed within this first operating cycle following program formalization. The infractions identified are a small percentage of the total program and are the result of human error and scheduling difficulties.

Our records show for the three (3) calibration procedures which had been written, that ST 2.25.2 Core Spray Pump Flow was performed on June 27, 1978, and ST 2.25.7 - ESW Pump Discharge Pressure was performed on July 31, 1979. ST 2.20.22 - Recirculation Pump Speed is normally scheduled during refueling outages. This calibration will be performed during the September, 1979 Unit 3 Outage, however, the Unit 2 calibration was performed in October 1978. Procedures have been written for the two (2) instrument calibrations which had no procedures at the time of the audit. The RCIC Pump Flow and Diesel Fuel Oil Storage Tank Level instrument calibrations will be performed by the end of November, 1979. The inspector identified four (4) areas which require instrument calibration procedures. CAD Liquid Nitrogen Tank Level, Fire Pump Flow and Pressure, Diesel Fire Pump Fuel Oil Tank Level, and CO2 Tank Pressure and Level Instrument Calibration procedures will be written and performed by the end of November, 1979.

Administrative Procedure A-29 has been written to ensure that any new instrument testing and calibration requirements are identified as Technical Specification revisions are received.

- C. Technical Specification 6.8.1 states in part, "Written procedures and administrative policies shall be established, implemented and maintained that meet the requirements of Section 5.1 and 5.3 of ANSI N18.7 - 1972 and Appendix "A" of USAEC Regulatory Guide 1.33..."

Administrative Procedure A-26, Procedure for Corrective Maintenance, specifies, among other requirements, the following:

Shift supervision shall indicate the Tech. Spec. status of Maintenance Request Forms (MRF's) on the MRF and should indicate the Tech. Spec. status in the Control Room MRF Log Book.

1. Contrary to the above eight MRF's initiated during the period January 4, 1978 through May

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1, 1979 were identified during the inspection in which Section 2 of the MRF was identified as a Tech. Spec. item with no Tech. Spec. status indicated in the MRF Log Book.

The prescribed flow path for the original of a MRF from its initiation to final disposition, including close out in the MRF Log Book.

2. Contrary to this specified flow path for a MRF original, the original for six MRF's issued during the period April 29, 1978 through October 27, 1978, identified as open in the MRF Log Book on May 22, 1978 could not be located.

Shift supervision approval in Section 4 of the MRF, and control operators equipment turnover in Section 5 of the MRF, be completed before actual work on equipment is undertaken.

3. Contrary to this requirement, MRF's in the Control Room awaiting the completion of Section 7, operator verification, on May 24, 1979 had their work performed without shift supervision approval in Section 4, and three of these MRF's and their work performed without Section 5 equipment turnover completed.

The inspection and clean up of a work area, by the lead craftsman, upon completion of work. This inspection to include the cleanup of the work area and proper housekeeping practices involving the tools, equipment and materials used in performance of the work.

4. Contrary to this requirement, an area in the base of the plant stack was noted where previous maintenance had obviously been performed in which stack flow transmitter water tight covers had been let adrift, a junction box cover left off, and a general lack of cleanliness and housekeeping was evident.

Response

Item C.1 identified a problem with logging of the Technical Specification requirements in the MRF log book. This is a result of human error. Procedure A-26 states that shift supervision shall indicate the Technical Specification status in the appropriate check-off box in section 2 of the MRF and indicate the Technical Specification in the MRF log book. The original intent of marking the Specification status in the MRF log book was to aid shift supervision in a MRF review which is required prior to startup. It has been found that this system of marking

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the log book and section 2 of the MRF are redundant. The procedure will be revised to delete this requirement and a new check-off procedure will be implemented which meets the original intent by specifically indicating which work is required for plant startup.

Procedure A-26 will be revised to reflect the changes mentioned above by the end of November 1979.

Items C.2 and C.3 are the result of the supervisor's failure to properly execute an administrative procedure. The importance of following administrative as well as the importance of operating procedures has been emphasized, and in particular, Administrative Procedure A-26 has been discussed with the individuals involved.

Item C.4 is the result of human error on the part of the maintenance craftman as well as the shift supervision. The craftman should have addressed housekeeping, additionally shift personnel have a responsibility to maintain good housekeeping. Shift supervision and maintenance supervision have been reminded of this requirement and the need to constantly police good housekeeping. They have also been instructed to communicate this to their personnel.

Very truly yours,

