

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-5001

SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

April 8, 1982

Docket Nos. 50-277
50-278

Inspection No. 50-277/82-03
50-278/82-03

Mr. Richard W. Starostecki, Director
Division of Project & Resident Programs
United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Starostecki:

Your letter of March 12, 1982, forwarded combined Inspection Report 50-277/82-03 and 50-278/82-03 Appendix A and addresses several items which do not appear to be in full compliance with Nuclear Regulatory Commission requirements. These items are restated below along with our response.

- A.1 Technical Specification 6.8 and Regulatory Guide 1.33 require implementation of procedures for fire protection systems. Licensee procedure 12.1, revision 2, November 12, 1981, "Procedure for Controlling Technical Specification Firewatch and Firewatch Patrols," requires dedicated fire watches for inoperable cardox suppression systems and for inoperable cable spreading room fire barriers. Additionally, the fire watch must have a portable fire extinguisher (in addition to permanently mounted extinguishers that may be in the area).

Contrary to the above, the following conditions were observed:

1. At 2:30 PM on February 16, 1982, fire barrier penetration 2xT 010 in the cable spreading room was inoperable and the required dedicated fire watch was not posted.
2. On February 16 and 17, 1982, a fire watch posted because of cable spreading room cardox system inoperability did not have a portable fire extinguisher.

This is a Severity Level V Violation (Supplement I) applicable to DPR-44 and DPR-56.

RESPONSE

The two occurrences listed above were investigated. This investigation indicated that a fire watch was not posted during the period of time that a fire barrier penetration in the cable spreading room was inoperable due to a procedural deficiency. The existing procedure relating to removal of fire barriers erroneously required only the notification of shift supervision and did not explicitly include the requirement for a fire watch. The placement of a fire watch was left to shift supervision for implementation and was therefore, as such, subject to potential for misunderstanding or oversight. Our investigation determined that this was the case in this incident. The lack of detail in the implementing procedure resulted in inadequate communications between Shift Supervision and the work force; thereby, resulting in this occurrence. The implementing procedure which deals with the installation and inspection of fire barriers has been revised to provide additional specific detail such that Shift Supervision will be informed of fire barriers which are to be opened, their location, and the need to post fire watches. This notification will be provided before permitting work on any fire barrier. The new procedure will be implemented after approval by appropriate management personnel. Verbal instructions have been given to the personnel involved in this area to provide the needed information to shift supervision. This temporary measure and final approval of the new procedure should prevent recurrence.

The failure of a fire watch to have a portable fire extinguisher is considered a personnel error. The present Administrative procedure A-12.1, Fire Watch Associated With Tech. Spec. Requirements, requires that a portable fire extinguisher be in the possession of the fire watch. This information is given to the individual in written form when he is assigned fire watch responsibility. In order to prevent recurrence, personnel who are assigned fire watch responsibilities have received training during recent safety meetings. This training has been completed and should prevent recurrences of this nature.

A.2 Technical Specification 6.11 requires adherence to procedures for radiation protection. Licensee procedure HPO/CO-10, revision 17, February 4, 1981, "Conduct in Controlled Areas -- Minimum Exposure," requires individuals to always wear provided dosimetry.

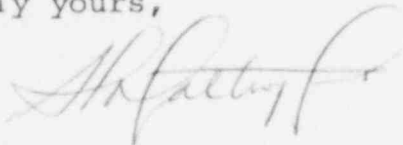
Contrary to the above, at 2:25 PM on February 16, 1982, an individual was in a controlled area, the Unit 3 Torus Room, without his Eberline TLD, an item of dosimetry provided for monthly exposure determinations.

This is a Severity Level VI Violation (Supplement IV) applicable to DPR-56.

RESPONSE

This violation of HPO/CO-10, revision 17, is the result of an individual personnel error. While in the change area, the individual, a vendor, inadvertently left his Eberline TLD with his clothes when he entered the controlled area. When this error was discovered, health physics technicians notified the individual and corrected the dosimetry problem. The individual was wearing his Harshaw badge and self reading pocket dosimeter. The individual's Harshaw badge was pulled and it read less than 10 mrem. In addition, the Harshaw badge of a co-worker who had accompanied the worker into the controlled area was also pulled. It also read less than 10 mrem. It is therefore concluded that the individual's dose for February 16, 1982, was less than 10 mrem. The Eberline TLD cycle change was completed on March 31, 1982. A 10 mrem exposure was assigned to the individual's official reading. This violation is considered an isolated case. The individual was new at Peach Bottom Atomic Power Station. He was instructed to pay particular attention in the area of personnel dosimetry.

Very truly yours,



cc: C. J. Cowgill - Site Inspector

COMMONWEALTH OF PENNSYLVANIA

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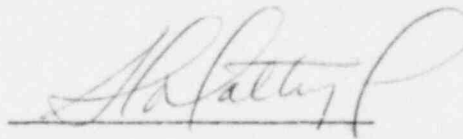
SS.

COUNTY OF PHILADELPHIA

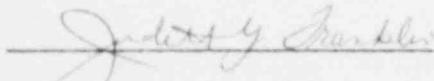
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S. L. Daltroff, being first duly sworn, deposes and says:

That he is Vice President of Philadelphia Electric Company,
the Applicant herein; that he has read the foregoing response to
Inspection Report No. 50-277/82-03 & 50-278/82-03 and knows the
contents thereof; and that the statements and matters set forth
therein are true and correct to the best of his knowledge,
information and belief.



Subscribed and sworn to
before me this 8th day
of APRIL, 1982


Notary Public

Notary Public, Philadelphia, Philadelphia Co.
My Commission Expires July 28, 1983