

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA 19101

(215) 841-5001

SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

October 21, 1982

Docket Nos. 50-277
50-278

Mr. Thomas T. Martin, Director
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Martin:

Your letter of September 22, 1982, forwarded Combined Inspection Report 50-277/82-20 and 50-278/82-19. Appendix A addresses one item which does not appear to be in full compliance with Nuclear Regulatory requirements. The item is restated below along with our response.

Non-Compliance

Technical Specification 6.9.2.a(3) requires prompt notification within 24 hours with written follow-up within 10 working days for any abnormal degradation discovered in primary containment.

Contrary to the above, as of August 20, 1982, no notification was given for the abnormal degradation in primary containment, as evidenced by unacceptable Local Leak Rate Test results for nine containment isolation valves, discovered on various occasions during the Unit 2 refueling outage from February 20, 1982 to June 25, 1982.

This is a Severity Level IV violation (Supplement I) applicable to DPR-44.

Response

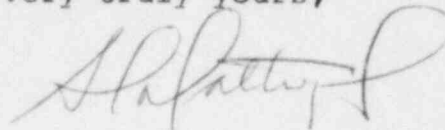
As stated in the inspection report, the licensee submitted LER 2-82-21/3L detailing the local leak rate test results after being advised by the inspector of the lack of notification. In the past, leak test results which exceeded the 10CFR50 limit of 0.6 La and MSIV individual leakages which exceeded the limits specified in Technical Specification 4.7.A.2.f had been reported by submitting a composite report 30 days after the completion of the refueling outage. This was done because during refueling, the containment boundary is not required. In the past, NRC inspectors have recognized this and concurred with our policy of issuing a composite 30-day report.

Regulatory Guide 1.16, Reporting of Operating Information - Appendix A Technical Specification, Section C.2., requires a prompt report for type B and C tests only when unit is operating and a 30-day report when containment integrity is not required at the time of the testing. In any case, we did not report the failure identified in the Inspection Report within 30 days.

In the future, we will issue a prompt report for the first LLRT failure, and a 30-day follow-up report for other failures found during the same outage, following the completion of all type B and C tests. However, we would like the NRC staff to reconsider the value of such prompt reporting in light of the fact that at the time of discovery of these failures, the plant is in an outage condition when containment integrity is not required.

If you have any questions, or require additional information, please don't hesitate to contact us.

Very truly yours,



cc: Site Inspector