



Gerald R. Rainey
Vice President
Peach Bottom Atomic Power Station

PECO Energy Company
RD 1, Box 208
Delta, PA 17314-9739
717 456 7014

September 15, 1994

Docket Nos. 50-277
50-278
License Nos. DPR-44
DPR-56

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

Subject: Peach Bottom Atomic Power Station Units 2 & 3
Response to Notice of Violation (Combined Inspection Report No.
50-277 & 50-278/94-15 And 50-352 & 50-353/94-19)

Gentlemen:

In response to your letter dated August 18, 1994, which transmitted the Notice of Violation concerning the referenced inspection report, we submit the attached response. The subject report concerned a Senior Reactor Operator Limited to fuel handling (LSRO) combined examination for Peach Bottom and Limerick Generating Stations that was conducted August 1-5, 1994.

If you have any questions or desire additional information, do not hesitate to contact us.

A handwritten signature in cursive script that reads "G. R. Rainey".

Gerald R. Rainey
Vice President
Peach Bottom Atomic Power Station

Attachment

CCN #94-14150

220031
9409220176 940915
PDR ADDCK 05000277
Q PDR

TEO1

cc: R. A. Burricelli, Public Service Electric & Gas
R. R. Janati, Commonwealth of Pennsylvania
T. T. Martin, US NRC, Administrator, Region I
W. L. Schmidt, US NRC, Senior Resident Inspector
H. C. Schwemm, VP - Atlantic Electric
R. I. McLean, State of Maryland
A. F. Kirby III, DelMarVa Power

bcc: J. A. Bernstein
Commitment Coordinator
Correspondence Control Program
D. M. Smith
J. B. Cotton
W. H. Smith
J. Doering, Jr.
E. J. Cullen
A. A. Fulvio
G. A. Hunger
M. C. Kray
C. J. McDermott
G. R. Rainey
J. T. Robb
R. K. Smith

63C-7, Chesterbrook
62A-1, Chesterbrook
61B-3, Chesterbrook
63C-3, Chesterbrook
53A-1, Chesterbrook
62C-3, Chesterbrook
63C-5, Chesterbrook
S23-1, Main Office
SMB4-6, Peach Bottom
62A-1, Chesterbrook
62A-1, Chesterbrook
S13-1, Main Office
SMB4-9, Peach Bottom
61C-1, Chesterbrook
A4-5S, Peach Bottom

RESPONSE TO NOTICE OF VIOLATION

Restatement of Violation

10 CFR 55.25 requires that if a licensed operator develops a physical condition that causes the operator to fail to meet the medical qualification requirements, the facility shall notify the Commission within 30 days of learning of the diagnosis.

Contrary to the above, PECO Energy (the facility) did not notify the Commission within 30 days of learning of a licensed operator with a physical condition that caused the operator to fail to meet the medical qualifications. Specifically, on December 13, 1991, a medical examination of a licensed reactor operator identified that the operator's vision did not meet medical qualification limits without corrective lenses, and the facility notified the Commission of the diagnosis on July 14, 1994, as part of license renewal.

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

Reason for the Violation

Medical personnel understood the requirements relative to visual acuity for licensed operators and that the use of corrective lenses effectively addressed visual deficiencies. There was confusion on the part of medical personnel, however, whether an update notification to the NRC was required for an operator license when a condition arose concerning the need for corrective lenses. NRC Form-396's, "Certification of medical examination by facility licensee" were accurately completed and placed in file, but medical personnel did not consider the need for corrective lenses to be significant enough to require that notification be made to the NRC. Although there was NRC guidance on licensed operator medical requirements, it was unclear to PECO Energy personnel that a condition for which the use of corrective lenses is required was also a condition that required a 30 day notification to be made to the NRC. As a result, medical procedures did not clearly identify the need for a 30 day notification to the NRC when the use of corrective lenses was required for licensed operators to meet medical standards.

At the time of this violation there was no single station procedure that provided overall control of interfaces, responsibilities and accountability relative to licensed operator medical requirements. Guidance information was either fragmented or in draft form, and there was not an adequate management tool to ensure that proper interfaces occurred and that required notifications were made. Since most of the activities related to licensed operator medical requirements were accomplished by experienced personnel, the perceived need for an overall control document was limited. In addition, due to the lack of a control process, self-assessment in this area was weak. As a result, process problems and weaknesses were not self-identified and corrected.

The Corrective Steps That Have Been Taken and the Results Achieved

Medical procedure, MDI/N-2 "Procedure for the Medical Evaluation of Personnel Requiring Nuclear Power Plant Operator Licenses (RO, SRO, LSRO) for the Nuclear Division and the Certification Thereof" was revised September 2, 1994, to include specific instruction for medical personnel to notify the Experience Assessment Group, Senior Manager of Operations or Manager Reactor Services of any changes in licensed operator medical conditions that would require submittal of a revised NRC Form-396 to the NRC. In addition, appropriate personnel in the areas of Operations, Training, Medical and Experience Assessment have been notified of NRC requirements for submittal of changes to operator's licenses.

An audit of facility licensed operator files, including LSRO's and former licensed operators, was conducted both at Peach Bottom and Limerick Generating Stations. Results of these audits indicated that most of the records reviewed were consistent with NRC requirements, however, oversights were identified at both facilities where the 30 day change notification had not been made. NRC Form-396's were completed and forwarded to the NRC to update corrective lens restrictions for licensed operators where previous NRC notification or license renewals had not been made.

The Corrective Steps that Will Be Taken to Avoid Further Violations

A Nuclear Group procedure is currently under development to properly delineate areas of responsibility and accountability for operator licenses, clarity on corrective lens issues and NRC Form-396 requirements, and 10 CFR 50.74 submittals to the NRC. This procedure will be completed and implemented by December 31, 1994. As a result of this procedure and the delineation of responsibility, appropriate groups will better assess the process and their contributions to it as part of the plant self-assessment process.

Date When Full Compliance Was Achieved

Full compliance was achieved September 2, 1994, when audit identified discrepancies at Peach Bottom and Limerick were corrected by submittal of updated NRC Form-396's to the NRC.