CCN 91-14062

PHILADELPHIA ELECTRIC COMPANY
PEACH BOTTOM ATOMIC POWER STATION
R. D. 1, Box 208
Delta, Pennsylvania 17314
(717) 456-7014

PEACH BOTTOM—THE POWER OF EXCELLENCE

D. B. Miller, Jr.
Vice President

May 2, 1991

10 CFR 2.201

Docket Nos. 50-277
50-278

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 Nos. 50-277/91-12; 50-278/91-12

Dear Sir,

In response to your letter dated 4/9/91 which transmitted the subject Inspection Report and Notice of Violation, we submit the attached response. The Inspection Report concerned our Radiological Effluent Control Program.

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

Sincerely,

Attachment

cc: R. A. Burricelli, Public Service Electric & Gas
T. M. Gerusky, Commonwealth of Pennsylvania
J. J. Lyash, USNRC Senior Resident Inspector
T. T. Martin, Administrator, Region I, USNRC
H. C. Schwemm, Atlantic Electric
R. I. McLean, State of Maryland
J. Urban, Delmarva Power

IE01
1/1

bcc:

J. W. Austin	A4-4N, Peach Bottom
J. A. Basilio	52A-5, Chesterbrook
G. J. Beck	52A-5, Chesterbrook
J. A. Bernstein	51A-13, Chesterbrook
R. N. Charles	51A-1, Chesterbrook
Commitment Coordinator	52A-5, Chesterbrook
Correspondence Control Program	61B-3, Chesterbrook
J. B. Cotton	53A-1, Chesterbrook
G. V. Cranston	63B-5, Chesterbrook
E. J. Cullen	S23-1, Main Office
A. D. Dycus	A3-1S, Peach Bottom
J. F. Franz	A4-1S, Peach Bottom
A. A. Fulvio	A4-1S, Peach Bottom
D. R. Helwig	51A-11, Chesterbrook
R. J. Lees, NRB	53A-1, Chesterbrook
C. J. McDermott	S13-1, Main Office
D. B. Miller, Jr.	SMO-1, Peach Bottom
PB Nuclear Records	A4-2S, Peach Bottom
J. M. Pratt	B-2-S, Peach Bottom
J. T. Robb	51A-13, Chesterbrook
D. M. Smith	52C-7, Chesterbrook

Restatement of the Violation

Section 6.8.1 of the Technical Specification requires establishing and implementing written procedures and administrative policies that meet the requirements of Sections 5.1 and 5.3 of ANSI N18.7-1972 and Appendix "A" of Regulatory Guide 1.33 (1972).

Contrary to the above, the electronic calibrations of the liquid radwaste effluents radiation monitor performed prior to and on May 5, 1989, were performed without a written and approved procedure.

Cause of the Violation

The electronic calibrations of the liquid radwaste effluent radiation monitor (LRERM) were performed prior to and on May 5, 1989 without the use of an approved controlled procedure as a result of not having a procedure available. A surveillance test existed to perform the radioactive source calibration required by Technical Specifications (Tech Specs). The surveillance test is performed by chemistry personnel. If this test fails, as was the case in the May 5, 1989 event, a maintenance request is generated and Instrumentation and Control (I&C) personnel perform an electronic calibration. On May 5, 1989, the electronic calibration was performed in accordance with the controlled vendor manual rather than an approved controlled procedure.

Corrective Steps Taken and Results Achieved

An I&C controlled procedure was approved on 1/23/90. This procedure covers the electronic calibration of the LRERM. Similar Tec' Spec instrumentation was reviewed to determine if controlled and approved calibration procedures existed. This resulted in the generation of a controlled procedure for the calibration of the Main Stack Noble Gas Monitor on 2/26/91.

Corrective Steps Which Will Be Taken To Avoid Further Violations

In addition to the corrective actions identified above, an I&C surveillance procedure was generated for the LRERM. This procedure requires that a yearly electronic calibration of the LRERM be performed regardless of the results of the yearly radioactive source calibration surveillance. This procedure was approved by the Plant Operations Review Committee on 4/23/91.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved upon the next performance of the electronic calibration of the LRERM which is scheduled to be completed by 6/30/91. This calibration will utilize the new surveillance procedure and the I&C procedure as required.