

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-5001

SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

April 11, 1983

Docket Nos. 50-277
50-278

Insp. Report 50-277/83-02
50-278/83-02

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

Dear Mr. Starostecki:

Your letter dated March 11, 1983, forwarded Combined Inspection Report 50-277/83-02 and 50-278/83-02. Appendix A 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 10 CFR 50 Appendix B, Criterion III, Design Control, requires measures to assure that applicable design bases are translated into specifications, drawings, and instructions. FSAR Section 5 and Appendix C indicate that the Containment Atmosphere Dilution (CAD) System is a Seismic Class I system. The CAD System atmosphere analyzers require a nitrogen reference gas supply for proper operation.

Contrary to the above, seismic design requirements of the CAD analyzer reference gas supplies were not translated into specifications, drawings, and instructions (i.e., the Construction Job Memorandum, Engineering Work Letter, and Construction Drawing), either prior to installation of the supplies during October 1978 through April 1979, or at any time thereafter until about February 7, 1983.

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

Response:

The CAD analyzer system was installed in 1975-76 as MOD 1. A commitment was made in FSAR, Supplement 1, Response to Question 14.6 that the analyzers will be designed to withstand the Maximum Credible Earthquake without loss of function. Seismic analysis and testing of the analyzers was performed and the analyzers were included in the Project Q-List (Q-Number 19.715). Details of the extent of Q-Listing were shown on Quality Assurance Drawing (QAD) M-872. The analyzer panels were classified as safety-related equipment while their span, zero, and reference gas supplies were not.

Originally, one gas supply furnished both the zero and reference gas for the analyzers. In 1978-79 the analyzer zero and reference gas supplies were divided into two individual and separate supplies (one for the zero and one for the reference) because of operating difficulties which were being experienced. This work was performed as MOD 1-F. All work outside of the analyzer cabinets was designated as non-Q consistent with the Q-List/QAD classification and therefore was completed in accordance with non-seismic requirements.

During the inspection period, there was insufficient time to thoroughly review the CAD analyzer system. Since that time, we have completed a review of the CAD analyzer design and installation and has concluded that the analyzer reference gas supplies (N2) are not essential for the reliable operation of the analyzers. The reference gas in question is utilized to provide a convenient basis of comparison for the thermal conductivity analyzers used to monitor hydrogen concentration. The manufacturer's Technical Director has advised that the use of non-flowing nitrogen, or even ambient air, will not materially effect analyzer operation for the ranges and sensitivities of interest. In concert with the review of the analyzer design and installation, a test calibration has been performed using ambient air as a reference gas and verified that indeed analyzer operation remains unaffected. We

regret that this information was not available in a timely matter to meet the inspector's needs.

Based on the above evaluation, it appears that the CAD analyzer system was installed as designed and that the proper design control was exercised. Therefore it seems appropriate for Philadelphia Electric Company to request that the NRC reconsider this violation.

In response to the inspector's request to provide positive measures concerning Seismac Class I bottles, the following information is furnished. Positive measures have been taken to ensure that all Seismic Class I bottles are properly identified and maintained in a seismically qualified condition. Surveillance Test (ST) 7.9.2, Rev. 5 dated March 17, 1983 has been issued. This revision requires that the individual visually verify the integrity of the system. This includes verifying that bottles are placed in their installed racks and secured with the seismic restraints at all times. Additionally, St 7.9.2 requires that a seismic "restraint secured" check-off be satisfactorily completed. Operators have been instructed that only the proper size bottles which can be installed in the seismic restraint racks without disconnecting the tubing supports are to be used and that the tubing supports are not to be disconnected.

- A.2 Technical Specification 6.8 and Regulatory Guide 1.33 (November 1972) require implementation of written procedures for fire protection. Administrative Procedure A-30, Revision 4, May 21, 1981, Plant Housekeeping Controls, requires all fire doors to be kept closed except to accommodate the movement of personnel or equipment.

Contrary to the above, at 12:30 p.m., January 26, 1983, the fire door between Unit 3 RHR Rooms 'B' and 'D' was blocked open; and at 11:20 a.m. February 7, 1983, the fire door to the Diesel Driven Fire Pump Room was blocked open. Neither of these doors was open to accommodate the movement of personnel or equipment.

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

Response:

Upon notification by the inspector, both doors in question were immediately closed. The door between the Unit 3 B and D RHR rooms had been opened to accommodate hoses for decontamination. The door was inadvertently left open when the decontamination crew left the area which was unattended for a period of less than one hour. The decontamination crews' supervision was instructed on the importance of maintaining fire doors closed.

The door to the Diesel Fire Pump Room was open to facilitate maintenance in the area. When personnel exited the area, the door was not closed because this door did not have a "Fire Door, Keep Closed" sign posted on it. This door was inadvertently overlooked during preparation of the surveillance test for fire door inspections. This omission resulted in a "Fire Door, Keep Closed" sign not being placed on the door. Subsequently, a "Fire Door, Keep Closed" sign was placed on the door and a surveillance test was initiated on February 10, 1983 for a weekly check of the door.

Since the time of this event an alarm circuit has been installed on the door and the surveillance test which checks the integrity of fire doors has been revised to include this door. The revised surveillance test has been in use since March 30, 1983. These actions should prevent future occurrences.

Sincerely,

A handwritten signature in dark ink, appearing to read "R. Starostecki", written in a cursive style.

cc: A. R. Blough, Site Inspector Peach Bottom