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DESIGNATED ORIGINAL

Certified By

Maria Elena Grendle

July 19, 1983

Re: Docket Nos. 50-277
50-278

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

Dear Mr. Starostecki:

Your letter of June 8, 1983 (R. W. Starostecki, NRC, to S. L. Daltroff, PECO.), forwarded your Systematic Assessment of Licensee Performance (SALP) of our Peach Bottom Atomic Power Station (PBAPS) facility for the period of March 1, 1982, through February 28, 1983. On June 16, 1983, a meeting was held between the NRC staff and Philadelphia Electric Company to discuss the SALP findings. Philadelphia Electric Company appreciates the opportunity to have met with you to discuss our performance and to comment on your report findings. The Attachment to this report will formalize our comments to your 1983 SALP report associated with our performance of activities associated with our PBAPS.

As we discussed at the SALP meeting, the review period of this SALP overlapped the previous SALP for the period March 1, 1982, through June 30, 1982. As was mentioned at our meeting, the NRC required this overlap period for their own administrative purposes. Philadelphia Electric Company believes that this overlap period (thirty-three percent) may have resulted in a SALP that depicts an inaccurate and more critical overview of Philadelphia Electric Company's performance than is warranted.

Mr. R. W. Starostecki

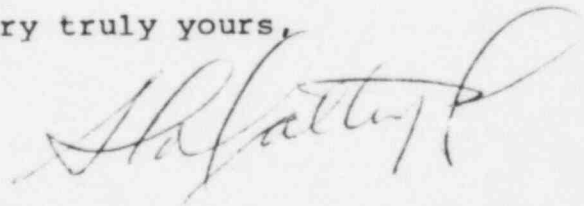
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This overlap has resulted in duplication of comments and responses.

The responses included in the attachment are separated by Category in a format similar to your report. Each response is preceded by a restatement of the appropriate NRC comment.

If you have any questions or wish to discuss further any part of our attached response to the SALP report, please do not hesitate to contact us.

Very truly yours,

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

Attachment

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

PHILADELPHIA ELECTRIC COMPANY

response to

NUCLEAR REGULATORY COMMISSION
1983 SYSTEMATIC ASSESSMENT OF
LICENSEE PERFORMANCE (SALP)

for

PHILADELPHIA ELECTRIC COMPANY'S
PEACH BOTTOM ATOMIC POWER STATION

for the review period:

March 1, 1982 - February 28, 1983

July 15, 1983

PLANT OPERATIONS

SALP Comment

"Management oversight of activities outside control room is much less evident"

"...supervisors need to be more aggressive in assuring that procedures are being followed, and in reviewing subordinates work....for acceptability."

"...licensee has not developed in site personnel a firm commitment to strict adherence to administrative controls and approved procedures."

"...licensee needs to evaluate procedure adequacy, training of personnel, and supervision of activities...to develop effective correction measures."

"...the licensee should develop a strong program to effect more thorough adherence to requirements."

Response

Management is establishing a more active role in overseeing the day to day work habits of both PECO and contractor personnel. The Station Superintendent will request that employing officers of individuals assigned to Peach Bottom, as well as station supervisors, conduct closer supervision of work and demand stricter adherence to procedures. In addition, the General Employee Training (GET) received by personnel at the PBAPS is being supplemented by instruction provided to the technical staff by Construction Division supervisory personnel. This instruction emphasizes strict adherence to established procedure. Additional individual training beyond this program is provided to personnel when needed.

Personnel errors are corrected by retraining, and where required, by disciplinary action.

In order to improve communications between all working groups at PBAPS, and to stress the need for individuals to follow procedures, the Station Superintendent in late 1982 held a series of two-hour discussions with a total of 732 site personnel. The topics discussed included health physics problem areas and requirements, radwaste minimization, housekeeping and fire protection, and the implementation of the nuclear plant rules.

PECO has also established as of January 1, 1983, an expanded GET program for new or recently transferred employees to PBAPS. This program, patterned after the Institute of Nuclear Power Operations (INPO) guidelines, includes practical exercises requiring every attendant of the class to:

- a) Dress in anticontamination (anti-C's) clothing.
- b) Self-frisk with radiation monitoring instrument.
- c) Demonstrate their ability to use and interpret a radiation work permit.
- d) Demonstrate their ability to read and understand their personal radiation monitoring device.

This expanded GET program is expected to reduce health physics infractions.

A yearly requalification training program is required for employees to maintain their unrestricted access to the station. This training is also used as an opportunity to review with PBAPS employees major incidents during the past year.

Employee training is an ever changing program which requires participation by both training staff and supervisory personnel. The new training programs identified by letter dated April 27, 1983 (V. S. Boyer, PECO, to R. C. DeYoung, NRC), demonstrates the commitment Philadelphia Electric Company has to safety and quality in operation of our facility.

RADIOLOGICAL CONTROLSSALP Comment

"...licensee management had not placed sufficient emphasis on overall health physics performance or ALARA."

Response

An action plan was developed to delineate specific steps for improving radiation protection. This action plan was developed from:

- a) NRC inspections and the health physics appraisal program.
- b) INPO special assessment audit requested by PECO.
- c) PECO management recommendations.

Significant progress has been made in resolving the issues in the action plan. As of June, 1983, of the 52 issues dealing with ALARA, radiation protection, training and administration, 42 - or more than 80% have been resolved. Of the 13 rad waste related issues, 10 - or more than 75% have been resolved. Of the 24 good practice recommendations, 16 - or more than 65% have been resolved. Efforts continue on the remaining issues. A monthly status report is being provided to management.

The ALARA program in effect since October, 1981, has been formalized into a procedure and has been approved by the Plant Operating Review Committee (PORC). At PECO's request, the Institute of Nuclear Power Operations (INPO) reviewed the procedure and its implementation during two separate plant visits; one prior to, and one during the current Unit 3 refueling outage. No major deficiencies were identified. However, INPO provided recommendations to improve the program, which are being adopted where appropriate.

The formation of an ALARA Committee has begun. This committee will be headed by the site ALARA coordinator. Representatives will be provided from Construction, Maintenance, Operating, Health Physics and Chemistry, and the Corporate Radiation Protection Section.

The Director - Radiation Protection Section will initiate ALARA audits in concert with the site ALARA coordinator.

SALP Comment

"The licensee did not have formal procedures covering major areas of the radiation protection program."

Response

This comment appears to refer to the 'Radiation Protection Procedures' comments contained in Inspection Report 50-277/82-26 and 50-278/82-25 dated January 21, 1983. Included within this report were six specific items relating to radiation protection procedures. Each of these radiation protection procedures have been implemented by Philadelphia Electric Company. The stop work authority for Health Physics is authorized by Control Procedure HPO/CO-101.

SALP Comment

"Several unplanned exposures resulted from failure to adhere to procedures. ...a disregard of procedure requirements and of good health physics practices."

Response

It is important to note that there have been no overexposures at the PBAPS. This comment refers to personnel experiences above that expected on a particular job, generally because of a failure to follow procedure. In December, 1982, a Quality Team was created to review the problem of failure to follow procedures and to improve personnel adherence to radiation protection. This team consists of representatives from Construction, Maintenance, Operation, Health Physics and Chemistry, and Instrument and Control personnel. The team has met several times and will complete their report within one month. The finished report will be reviewed by plant staff and Quality Assurance for incorporation into plant procedures.

SALP Comment

"A lack of storage and staging space, and of aggressiveness in resolving technical problems in processing and packaging, resulted in storage of more than 300 drums of radioactive waste

in areas that impacted on the effectiveness of ALARA performance."

Response

A contractor was hired in January to process, package and remove the backlog of waste drums stored throughout the PBAPS facility. Thru July 15, 1983, this contractor has removed over 1500 waste drums. The contractor is expected to finish removal of this backlog (plus waste drums generated during the period January through June 1983) by the end of August, 1983.

Plans have been developed for the construction of a new rad waste storage/staging facility. Construction should start late summer of 1983 with completion expected by early 1985. This new construction will add to the existing drum storage.

In addition, an engineering safety evaluation report was performed establishing and documenting the ability to use the former PBAPS Unit 1 new fuel vault area to store radioactive material in compliance with the NRC's rules and regulations. Procedures are being prepared to take advantage of this finding.

SALP Comment

"No program to control and reduce the generation of radioactive waste has been implemented."

Response

There have been efforts to control the volume of rad waste. A "green is clean" campaign has been initiated. Certain plant areas are designated as clean waste deposit areas. Green drums are located in the areas for this purpose.

Workers are instructed to minimize transport of clean cartons and containers into the plant.

Rad waste trash is inspected for the purpose of checking for free standing liquids. In the process recoverable items are removed thereby reducing rad waste volume.

Respirator cannisters are re-cycled after successful testing, thus reducing waste volume.

Waste water and oil drums are analyzed and when found contaminated, are processed via a new carbon/resin filtration system for recovery.

These efforts have resulted in some reduction in rad waste volume. Additional efforts are still in the formulative stage. These include the procurement of trash sorting, monitoring and shredding requipment, either of which could result in substantial reduction in rad waste volume.

MAINTENANCESALP Comment

"...significant housekeeping and contamination control problems occurred during Unit 2 outage..."

Response

Management is developing an awareness program as part of its renewed commitment of improved housekeeping. This program includes specific instruction and emphasis during GET training, review of overall plant performance during GET requalification, and reinforcement by visual exhibits.

SALP Comment

"Coordination and communications involving maintenance occasionally breakdown or are incomplete... Inadequate pre-briefing and radiological controls consideration contributed to a significant worker contamination event..."

Response

This item was addressed in detail in Attachment II of our April 27, 1983 response to NRC fine EA No. 83-7 (V. S. Boyer, PECO, vs R. C. DeYoung, Director, Office of Inspection and Enforcement, NRC), and our response to SALP comments relating to Radiological Controls. Philadelphia Electric Company will significantly improve its radiation protection record with the implementation by PBAPS of an ALARA program, together with the establishment of a 'Quality Team', which is enhancing the coordination and communications involving maintenance during the planning of radiation area work. As part of the ALARA program, an ALARA group within the Health Physics (HP) section was established for the purpose of generating an "ALARA traveler", a step-by-step outline of the HP and ALARA work requirements needed to perform a specific job. This 'ALARA traveler' is kept with the radiation work permit (RWP) and is signed by the craftsman and HP technicians when each part of a job is completed. The establishment of this procedure has resulted in closer communication between crafts and HP technicians.

As described in previous responses, the training program for General Employee Training was modified to stress the need for improved personnel contamination control procedures such as frisking of outer clothing when exiting any potentially contaminated area. In addition, a remedial one-hour training program was provided to essentially all site personnel (676) during May and June of 1982. This remedial program specifically addressed frisking and contamination control requirements. In the fall of 1982, new more sensitive portal monitors were installed at the Guard House. Individuals identified as being slightly contaminated at this location are handled in accordance with the established practices identified in Administrative Procedure A-86, various HPO/CO procedures, and the Nuclear Plant Rules. Additional sensitive monitors were also installed at the exit of the power block in December of 1982. Starting in January of 1983, the General Employee Training Program was modified such that those individuals who received General Respiratory Training are required to don and remove anti-C clothing while being observed by an examiner. These actions, along with the location of frisking stations in permanent positions throughout the plant, is expected to improve control of personnel contamination.

As discussed in our response to LA No. 83-7, the Items in this response constitute and identify a broad-based program which will result in significant improvement in the radiation protection programs at Peach Bottom.

SURVEILLANCE

SALP Comments

"...lapses have led to significant events involving improper equipment lineups and ineffectiveness of independent checks and supervisory reviews."

"...strong commitment by workers and supervisors to carefully adhere to established administrative and procedural controls is not evident."

"...poor personnel performance has repeatedly weakened that (surveillance) program."

Response

Supervisory participation in the formal and informal training given employees; together with the initiation of communications through the establishment of our ALARA program will result in improved personnel performance and supervisory control of work.

The goal of all the aforementioned programs is to improve personnel performance, improve supervision of performance and documentation of the improved performance by elimination of procedural errors.

Further discussion relating to these items is included in the response to SALP comments relating to Maintenance and Radiological Controls.

FIRE PROTECTION AND HOUSEKEEPINGSALP Comment

"...vigilance is needed by supervisors and managers to change fundamental attitudes toward housekeeping...to avoid...deteriorations characteristic of past performance."

"Fire protection training programs are not carefully implemented."

"Fire watch requirements were not met on at least three occasions."

"...the licensee needs to devote more attention to detail by all managers, supervisors, and work performers."

Response

Philadelphia Electric Company is committed to providing a safe clean working environment for all PBAPS personnel. The establishment of an administrative Fire Training Program includes the creation of the position of 'Fire Protection Assistant' by October 1, 1983. This employee will be part of the Administration Engineering Section, and, as part of his duties, this employee will be responsible for overseeing the Fire Protection Training at PBAPS. Among the other duties of Fire Protection Assistant will be the review and oversight of fire watch requirements. For the response relating to housekeeping, see our response to SALP Comment, Maintenance Section.

The Division Superintendent, plant superintendent, and the assistant superintendent have discussed the importance of attention to detail to all levels of supervisory personnel in the PBAPS facility. Each plant staff meeting includes a review of the importance of the attention to detail, which in turn is relayed to work performers.

REFUELING/OUTAGE ACTIVITIES

SALP Comment

"...failure to adequately consider potential problems during a high tempo of outage activity."

Response

The establishment and implementation of ALARA programs and procedures into PECO's employee daily regimen is expected to be in place by Unit 2's next outage, and should allow for an orderly programming of Unit 2's outage.

SALP Comment

"Improved supervision of in-vessel work and closer overview of vendor activities is needed to effectively prevent potentially serious events from occurring."

Response

More attentive quality assurance audits, HP review and ALARA implementative, together with improved communication between management and workers and additional attention by outage management to fuel pool activities will result in improved in-vessel work (by both PECO and contractor personnel). Similar work performed during Unit 3's present outage and scheduled for this fall's Unit 2 outage (such as Mark I torus attached piping work) will result in more efficient use of time.

LICENSING ACTIVITIESSALP Comment

"...Philadelphia Electric has been a leader in completing major items such as NUREG-0737..... One exception, however, is NUREG 0737 Item II.B.2, Plant Shielding, for which the licensee's analysis was incomplete."

Response

As the SALP Report stated, Philadelphia Electric Company has been responsive in the implementation of the TMI Action Plan requirements. Many of the improvements were initiated prior to the issuances of the NRC requirements by a PECO task force studying the lessons learned from the TMI event. We take particular pride of our accomplishments in the areas of Emergency Procedures, Emergency Response Facilities, meteorological monitoring system, post-accident sampling system, safety relief valve position monitoring, and containment integrity improvements. However, we do acknowledge some inadequacies in the Plant Shielding Study as submitted to the NRC in January, 1980. We attribute this deficiency to the following:

- a) Failure of PECO to followup the original submittal to the NRC with a more comprehensive study and report in a timely manner. We will endeavor to improve our response to NRC regulations as described in our response to your SALP Comment relating to our fire protection program.
- b) The quality of the original submittal was impacted by the schedule restraints and the volume of requirements imposed by NUREG 0578, 'TMI-2 Lessons Learned Recommendations', the predecessor to NUREG 0737 'Clarification of TMI Action Plan Requirements'. The requirements, issued October 30, 1979, required completion of the plant shielding study within two months. This timetable provided insufficient time to accommodate a comprehensive study that included support from the Architect-Engineer, and to review and prepare a final report. We believe that most of the deficiencies in the report were due to poor presentation of the material, not with the technical quality of the study.

- c) The failure to adequately identify vital areas in the Shielding Study was impacted by a difference in interpretation of the requirements between the NRC staff and PECO. We partially attribute this to the delay between our submittal date and the initial NRC response (nearly three years).

SALP Comment

"...the licensee's management involvement in Fire Protection provides little evidence of prior planning and assignment of priorities and indicates poorly understood policies. Reviews concerning fire protection have not been timely, thorough, or technically sound. ...the licensee has sought frequent time extensions for resolution of the Fire Protection program. This may be due to poor staffing, lack of understanding of the issues, or poor prior planning and assignment of priorities. ...the licensee has shown, until recently, a lack of aggressiveness in responding to the NRC initiative on Fire Protection."

Response

Since the promulgation of the Fire Protection Program (Appendix R), Philadelphia Electric Company has incorporated many improvements into the design, procedures, and training of our Peach Bottom Atomic Power Station (PBAPS) to minimize fire hazards, enhance fire detection and suppression, and mitigate the consequences of fire damage. We do concur with your comments to the extent that they apply to the fire detector design and the safe shutdown capability provisions (Appendix R, Section III.G). We attribute the slow progress in implementing these provisions to the following:

- a) Failure of PECO to dedicate sufficient manpower resources in a timely manner addressing the analysis and design requirements of Appendix R.
- b) The failure of Appendix R schedules to recognize the magnitude of the effort to implement major revisions to vital safety systems. It is essential that the design, selection of material, safety reviews and installation of these modifications be performed in a careful and deliberate manner so as not to adversely impact plant safety.

Earlier this year, the manpower dedicated to the Appendix R issue was more than tripled to implement modifications that comply with the requirements of Section III.G. The NRC staff has been consulted on a continuing basis to assure compliance with NRC criteria prior to implementation.

The Philadelphia Electric Company licensing group has been directed to more closely monitor the progress of the engineering and operating department's implementation of NRC regulations, and notify management via periodic staff meetings of potential licensing problems. Electric Production management will re-emphasize the NRC concerns expressed in the SALP Report directly with the management of the Engineering Divisions.

Additionally, we had anticipated a more favorable response by the NRC regarding the exemption requests from several requirements in Section III.G. The denial of all exemptions requested further impacted the schedule to resolve the Appendix R issues. By maintaining the recent increased number of communications between our licensing group and NRC staff, Philadelphia Electric Company will establish and develop a clearer understanding of NRC regulations.

SALP Comment

"Degraded Grid Voltage - modifications completed; TS (Technical Specification) change - poor progress"

Response

By correspondence dated February 18, 1982, the NRC approved the proposed degraded grid voltage protection modification, and requested changes to the Technical Specifications to provide operability and surveillance requirements for the new system. PECO responded with an amendment application on May 12, 1982. Subsequently, on June 16, 1982, NRC staff requested that the application be modified to conform with a recently revised NRC Standard Technical Specifications (STS). By correspondence dated July 22, 1982, October 29, 1982, and March 14, 1983, we proposed changes to our amendment application, and provided justification for testing the degraded voltage relays semiannually rather than monthly as stated in the STS. The offsite safety review committee has expressed concern that frequent testing at full power would introduce an additional risk of

unanticipated transients with little additional benefit. While the issue of testing frequency has delayed final approval of the amendment, we believe that the additional time was essential to an in-depth consideration of the safety concerns associated with excessive testing requirements. Recently, on June 14, 1983, we received the NRC evaluation of our Technical Specification amendment requests. The evaluation concluded that additional changes to the amendment are necessary. We are currently revising the amendment application to reflect the requested changes.