



PEACH BOTTOM—THE POWER OF EXCELLENCE

**PHILADELPHIA ELECTRIC COMPANY**

PEACH BOTTOM ATOMIC POWER STATION

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D. B. Miller, Jr.  
Vice President

June 21, 1991

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 91-14-01/01  
(Combined Inspection Report Nos. 50-277 '91-14; 50-578/91-14)

Dear Sir:

In response to your letter dated May 23, 1991, which transmitted the Notice of Violation in the referenced inspection report, we submit the attached response. The subject inspection report concerns an inspection on environmental qualification conducted April 1-5, 1991.

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

Sincerely,

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

TE01

bcc. J. W. Austin	A4-4N, Peach Bottom
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J. M. Pratt	B-2-S, Peach Bottom
J. T. Robb	51A-13, Chesterbrook
D. M. Smith	52C-7, Chesterbrook

ATTACHMENT

Response to Notice of Violation 91-14-01/01

Restatement of the Violation

10CFR 50, Appendix B, Criterion V, states, in part, that: "Activities affecting quality shall be prescribed by documented instructions, procedures ... and shall be accomplished in accordance with these instructions, procedures ..."

Material Specification M-38A provided for fiberglass piping insulation for the modification package no. 5046.

Licensee Procedure No. NEDP 3.8, Section 2.1.1, states, in part, that: "Requests for authorization to depart from referenced specifications during the installation of a modification shall be processed as an Engineering Review Request (ERR) using the Engineering Review Request Form (ERRF)."

During the facility walkdown on April 3, 1991, the NRC inspector identified the installation of combustible anti-sweat insulation on the emergency service water piping system. Contrary to the above procedures, the licensee failed to complete the required ERRF, resulting in the use of materials that were not specified in the modification package (5046).

This is a Level IV Violation (Supplement I).

Reason for the Violation

During performance of modification (mod) work on the Unit 2 Emergency Service Water (ESW) system, unapproved insulation (Rubatex) was installed on small piping appendages such as clean-outs, caps, and plugs without prior engineering approval as required by procedure. The plant specifications called for these small appendages to remain uninsulated. Because of possible pipe-sweating that could create a housekeeping concern, the lead installation engineer approved installation of Rubatex to minimize pipe sweat as well as to prevent potential head-knocking injuries. The reason to install Rubatex was due to the assumption that Rubatex was an insulating material approved for plant use. Rubatex existed throughout the plant and was available in the storeroom.

Corrective Steps Taken and Results Achieved

A non-conformance report was generated on 4/5/91 to document the unapproved Rubatex insulation installation. It was determined that the advantage of installing anti-sweat insulation was not significant and the insulation installed during the modification was removed by 4/8/91. A corrective action report was also initiated on 4/5/91 to investigate and

prevent recurrence of installing material without engineering evaluation and approval.

On 4/5/91 a plant walkdown confirmed that Rubatex and other similar insulation was used throughout the plant.

The installations personnel involved in the event were informed of the significance of the event and counselled not to deviate from approved mod installation specifications without prior review and approval.

#### Corrective Steps Which Will be Taken to Avoid further Violations

Appropriate installations personnel were informed of this event including the need to thoroughly understand the scope and applicability of design specifications and the requirement to obtain engineering approval prior to deviating from installation instructions.

An engineering review is in progress to determine the extent and possible effects of installed Rubatex insulation. Preliminarily, there appears to be no fire protection concerns in respect to 10 CFR 50 Appendix R or combustible loading requirements. The review will also consider electrical separation concerns regarding combustible material between safety related cable trays and will determine the acceptability of using Rubatex, including properties of its adhesive. This review will be completed by 9/91.

#### Date When Full Compliance Will Be Achieved

Compliance with the insulation specification for the subject mod work was achieved on 4/8/91 with the removal of the Rubatex insulation. The engineering review of accessible areas to be completed by 9/91 will determine if further corrective actions are required. Inaccessible areas will also be evaluated with appropriate corrective action being taken when access is permitted.