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SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

November 22, 1983

Docket Nos. 50-277
50-278

Inspection Report Nos. 50-277/83-27
50-278/83-27

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

Dear Mr. Starostecki:

Your letter dated October 24, 1983, forwarded Combined Inspection Report 50-277/83-27 and 50-278/83-27. Appendix A addresses four items which do not appear to be in full compliance with Nuclear Regulatory Commission Requirements. Per your October 24, 1983, letter, Item A.4 does not require a reply since corrective action on this item was completed and verified by the Inspector during the inspection. Items A.1, A.2 and A.3 are restated below along with our response.

- A.1 Technical Specification 6.8, Procedures, requires that written procedures and administrative policies be implemented that meet Section 5.1 and 5.3 of ANSI 18.7-1972. ANSI 18.7-1972, Section 5.1.1, requires delineation of responsibilities to determine the circumstances, analyze the cause, and determine that operations can proceed safely before the reactor is returned to power after a trip. Procedure GP-18, Revision 1, July 6, 1983, Scram Review Procedure, requires the completed scram review check-off list, C.O.L. GP-18, to be reviewed by the Operations

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Engineer or alternate prior to subsequent plant startup.

Contrary to the above, a plant startup was commenced on October 2, 1983, and the C.O.L. GP-18 from a scram on September 27, 1983, had not been reviewed by the Operations Engineer or alternate.

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

RESPONSE

Immediately after the scram, the Technical Engineer (Operations Engineer was not on-site at time of the scram) proceeded to the Control Room. He was briefed on the scram by the STA and he inspected the completed C.O.L. GP-18, the computer alarm typer output, and the reactor charts. Although the procedure C.O.L. GP-18 review signoff blank was not signed or initialed, review of the transient by the Technical Engineer was documented in the STA Logbook following the scram.

The Operations Engineer, Station Superintendent, Technical Engineer, Shift Technical Advisor, and Shift Supervision were all briefed on or involved with the transient and were satisfied with the safety system operation and transient analysis following the transient. A thorough review of C.O.L. GP-18 had been completed, the transient was analyzed and the safety systems were verified to operate properly.

The Operations Engineer mistakenly signed the GP-2A check-off list for the October 2 start-up showing that he had reviewed C.O.L. GP-18 when in fact he had not. He recalled reviewing a C.O.L. GP-18, but it was for a previous scram that occurred on September 12, 1983. Both scrams were similar, had no improper operation of equipment, and had almost no operational effects on the power plant.

Upon notification by the inspector of the signoff omission, the Assistant Operations Engineer immediately performed a formal review of C.O.L. GP-18 for the October 2 scram.

As a result of this incident, the importance of complying with the exact requirements in procedural controls has been discussed with the senior staff. This should preclude future occurrences.

- A.2 Technical Specification 6.8, Procedures, requires that written procedures and administrative policies be implemented that meet Sections 5.1 and 5.3 of ANSI 18.7-1972. ANSI 18.7-1972, Section 5.1, requires that written administrative policies assure that procedures, including revisions thereto, are distributed to and used by the personnel performing the prescribed activity. Administrative Procedure A-2, Revision 25, September 7, 1983, Administrative Procedure for Control and Use of Documents requires that procedures to be used as Check-off lists or for surveillance testing be obtained from the main office files of the latest revision of procedures or copied from an up-to-date revision of the procedure.

Contrary to the above, procedures used for Check-off Lists and for surveillance testing were neither obtained from main office files of latest revisions nor copied from up-to-date revisions of the procedures, in that (1) on September 8 and 13, 1983, Surveillance Test ST 3.2.3, IRM Functional and Calibration Check, was performed using Revision 5, November 2, 1978, whereas the latest revision was Revision 6, June 13, 1983; and (2) on September 27, 1983, Check-off List C.O.L. GP-18, Scram Review Procedure, was performed using Revision 0, March 23, 1983, whereas the latest revision was Revision 3, September 21, 1983.

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

RESPONSE

The Surveillance Test ST 3.2.3, IRM Functional and Calibration Check, had been recently revised to incorporate minor improvements in recording "as found" information.

When required for startup, the surveillance test was removed and issued from a book of uncontrolled procedures kept available for startups.

The purpose of ST 3.2.3 is to verify the operability of the IRM channels. The outdated procedure revision still satisfied this purpose because the recent revisions were improvements in recording "as found" data only. Therefore, no immediate corrective actions were necessary to enhance performance of the surveillance test.

When Check-off List C.O.L. GP-18, Scram Review Procedure was required for the September 27 Unit 3 scram, an outdated revision was issued from a personal file of non-controlled procedures.

Per the April 14, 1983 NRC Inspection Report 277/83-05 and 278/83-05, the NRC inspector has reviewed GP-18 and the system for evaluating plant trips. The procedure and the evaluation process were considered technically adequate at the time. Since that date, changes were made to GP-18 in light of events at another plant. Because the past revision of GP-18 still satisfied the intent of the procedure, further immediate corrective actions were not required.

To prevent future occurrences, a letter has been sent to all Shift Superintendents, Shift Supervisors, and Shift Technical Advisors informing of the occurrences and instructing them to destroy files of uncontrolled procedures. The book of startup surveillance tests has been deleted and replaced with a single sheet listing the procedures used for a startup. Procedures required for startup will be removed from the controlled file or copied from books of controlled procedures available in the control room.

- A.3 Technical Specification 6.8 and Regulatory Guide 1.33 (November 1972) require implementation of written procedures for fire protection equipment. Administrative Procedure A-30, Revision 4, June 10, 1981, Plant Housekeeping Controls, states in paragraph 9, Maintenance of Fire Fighting Capabilities, that the storage of equipment and materials shall not impede access to fire-fighting equipment.

Contrary to the above, access to fire-fighting equipment was impeded, either through storage of material in front of equipment or by storage of the equipment away from its designated location, on September 26, 1983, for Fire Stations 135-23, 135-13, and 165-43; and on September 28, 1983, for Fire Stations 116-17 and 91-20.

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

RESPONSE

Each discrepancy was caused by a lack of attention to detail by individuals working in the areas. When informed of the discrepancies by the inspector, the problems were promptly corrected.

A letter has been sent to all Peach Bottom supervision reminding them and their personnel of their fire protection responsibilities. Work groups are also requested to report fire equipment discrepancies to their supervisors or shift supervision immediately. In addition, requirements for fire protection have been added to the Nuclear Plant Rules. These corrective actions should end any adverse fire protection trends.

Should you require additional information, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Sh. S. S. S. S.", is written over the typed name "Sh. S. S. S. S.".

cc: Mr. A. R. Blough