

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-5001

SHIELDS L. DALYOFF
VICE PRESIDENT
ELECTRIC PRODUCTION

February 23, 1984

Docket Nos. 50-277
50-278

Inspection No. 50-277/83-31
Inspection No. 50-278/83-29

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

Dear Mr. Starostecki:

Your letter of January 27, 1984, forwarded combined Inspection Report 50-277/83-31 and 50-278/83-29. The report cited one apparent violation of NRC requirement. This letter will restate the violation and provide our response.

1. 10 CFR 50, Appendix R, Section III.I requires that the fire brigade training program shall ensure that the capability to fight potential fires is established and maintained and shall include the following:
 - Regular planned meetings held at least every three months for all brigade members.
 - Practice sessions in actual fire extinguishment at least once per year for each brigade member.

Contrary to the above, during calendar year 1983, as of November 15, 1983:

- A. Five members of the fire brigade had not attended regular planned meetings at least every three months.
- B. Six members of the fire brigade had not participated in practice sessions at least once per year.

8404170230 840410
PDR ADOCK 05000277
Q PDR

Response 1A:

Prior to this inspection, on September 9, 1983, the Quality Assurance Division of the PECO Electric Production Department identified this deficiency. The site management responded to the QA Assurance Division Audit Non-Compliance Report providing the cause and the corrective action to be taken. This non-compliance was caused by an inadequate tracking system and in part to the varied schedules of the brigade members who are primarily shift workers. Peach Bottom documents attendance in the meetings using a Surveillance Test (ST 16.19). This test is issued to the Shift Superintendents monthly and is returned to the Surveillance Test Coordinator when completed. A copy of the attendance sheet included in the surveillance test is forwarded to the Nuclear Training Section for tracking the attendance of each fire brigade member. The Nuclear Training Section sends a list of those members who have not attended a meeting during the first two months of the quarter to the Operations Engineer.

In response to the QA audit, the Operation Engineer's staff, using the list provided by the Nuclear Training Section, ensures that each individual who has not attended do so or reviews the material covered in the meeting individually if he is unable to attend the meetings due to his work schedule. The meeting attendance or individual review of material is then documented on the surveillance test attendance sheet.

The Station Superintendent of Peach Bottom has written a letter to the Operations Engineer, the Nuclear Training Section Coordinator, the Site Training Coordinator and to all shift supervision. This letter emphasized the importance of attendance at the monthly fire brigade meetings and Peach Bottom's commitment of maintaining fire protection training as a high priority item.

A review of the surveillance tests for the fourth quarter of 1983 shows that all fire brigade members have met the requirements of ST 16.19.

Response 1B:

This deficiency was also identified by the Quality Control Division of the Electric Production Department in an audit performed on September 9, 1983. The cause of this non-compliance is the limited availability of the fire school combined with the work assignments of the fire brigade members.

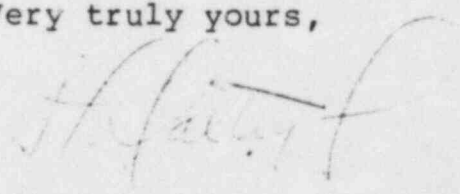
The fire school used for practice sessions is located in West Conshohocken, PA., and participation at this fire school is not limited to Philadelphia Electric Company. The practice sessions are held only in the Spring and the Fall.

All of the fire brigade members identified as being deficient have either been scheduled for training in the Spring class of 1984, or have been certified as licensed operators (licensed operators are not considered fire brigade members.)

In an effort to aid in solving the scheduling problems, PECO has instituted a change in the way operators will man the shifts at Peach Bottom. The operations staff is now on a six-man rotation for all positions except shift supervisors. The six-man rotation will result in additional time available for training. Therefore, many or most of the fire brigade members can be retrained at the fire school in a six week period by sending an entire shift to the school as a team each week. First priority has been assigned to Peach Bottom fire brigade training at the PECO fire school.

If there are any further questions, please do not hesitate to contact us.

Very truly yours,



cc: A. R. Blough, Site Inspector