

# PHILADELPHIA ELECTRIC COMPANY

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SHIELDS L. DALTROFF  
VICE PRESIDENT  
ELECTRIC PRODUCTION

April 17, 1984

Docket Nos. 50-277  
50-278

Inspection Report Nos. 50-277/84-03  
50-278/84-03

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 dated March 19, 1984, forwarded Combined Inspection Report 50-277/84-03 and 50-278/84-03. Appendix A of your letter addresses two items which do not appear to be in full compliance with Nuclear Regulatory Commission requirements. These two items are restated below along with our response.

- A. Amendment 53 (dated May 23, 1979) to Facility Operating Licenses DPR-44 and DPR-56, and its associated Fire Protection Safety Evaluation, require implementation of a program for inspection and lubrication of yard hydrants in the fall of each year, including a maintenance program to ensure that no standing water remains in the hydrant.

Contrary to the above, an adequate hydrant maintenance program was not implemented, in that deficiencies involving standing water in Hydrant H-5, although noted and documented during the inspection on November 1, 1983, were allowed to persist until about January 23, 1984, which led to the hydrant being inoperable for some undetermined time due to freezing.

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

Response

This occurrence resulted from a procedural deficiency. Surveillance procedure, ST 16.15, "Fire Hydrant Lubrication", is scheduled to be performed once per year during the month of September to satisfy fire hydrant lubrication and inspection requirements. This test was completed in conjunction with Philadelphia Electric Company Safety Department procedure SAF-TIP-13, "Fire Hydrant Shutoff and Lubrication Procedure", on September 21, 1983. The procedure identified a drainage problem with hydrant H-5; and as specified in the procedure, a Maintenance Request Form was submitted to correct the problem. However, the procedure did not identify any preliminary corrective actions. As a result, the consequences of failing to drain the hydrant barrel were not immediately realized.

On January 20, 1984, ice was found in the H-5 hydrant barrel. Maintenance personnel returned the hydrant to service after defrosting and draining the water from the barrel. Weekly inspections were then performed to ensure that the hydrant barrel remained free of standing water during subfreezing weather. No additional icing problems with this hydrant were observed.

Excavation of the area revealed that the ground around the hydrant was too water saturated to keep the hydrant barrel sufficiently drained. Philadelphia Electric Company's Mechanical Engineering Division has been requested to provide an alternate means of draining this hydrant.

Surveillance procedure, ST 16.15, will be revised to better address deficiencies which could lead to problems during subfreezing weather. This revision will include preliminary corrective actions such as manually draining hydrants with drainage problems, followed by periodic inspections until permanent corrective action can be taken. The procedural revision will be completed prior to the tests next scheduled issuance date.

- B. 10 CFR 50, Appendix B Criterion XVI, Correction Action, as well as Section 2.16 of the licensee's approved Quality Assurance Plan (Revision 4, January 1980, and subsequent revisions), requires measures to assure that conditions adverse to quality are promptly identified and corrected. Chicago Bridge and Iron Nuclear QA Manual for ASME Section III Products, Issue 8, March 22, 1978, applicable to major torus structural modifications, requires in Division 4, Section 14.4, that all nonconformances except (1) surface irregularities that are eliminated by surface

conditioning, and (2) welded corrections to welds made during the course of deposition to be reported, documented, and formally dispositioned. If a nonconformance is repaired, the repairs are required to be per an approved repair procedure or contract drawing.

Contrary to the above, during torus structural modifications in the Spring 1982 Unit 2 outage, a nonconforming condition (i.e., through-wall damage to the torus vent header shell in the area of a stiffener support plant weld) was not reported, documented or formally dispositioned. Further, the damage was partially repaired without use of an approved repair procedure or contract drawing. These nonconformances were not identified or corrected until February 20, 1984.

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

#### Response

While Unit 2 was shutdown, an inspection of the vent header inside the torus on February 20, 1984, found a defect that resulted from installation of stiffeners during torus modifications performed in 1982. This discrepancy was reported in our response of March 30, 1984 (S. L. Daltroff to T. E. Murley) relative to I.E. Bulletin 84-01, Cracks in BWR Mark I Containment Vent Headers. The defect found was through-wall damage to the torus vent header behind a support plate for a stiffener and therefore visible only from inside the header. As stated in the inspection report, no nonconformance or field repairs were documented for this defect.

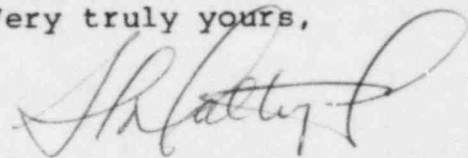
The nonconforming condition (i.e., through-wall damage to the torus vent header) resulted from the improper action of an individual craftsman while welding plates on the external surface of the vent header. The fact that the damaged area was covered over by the new plate made subsequent detection during Q.C. surveillance virtually impossible from the exterior of the vent header. Failure of the craftsman to report the nonconformance indicates a need to further emphasize to personnel working in the plant that they have an obligation to report nonconforming conditions to their supervisor for corrective action, with no penalty to the individual reporting the condition.

Accordingly, we will (1) incorporate this obligation into the written Nuclear Plant Rules, and (2) revise the General Employee Training (GET) program to better emphasize this

obligation. The improvements include the presentation of the revised Nuclear Plant Rules during each type of GET program, which is an annual requirement for all personnel. In addition, increased emphasis of the obligation has been incorporated into the new Radiation Protection video tape. These improvements will be implemented on or before July 1984. A copy of the Rules is currently handed out to the GET participants and will be incorporated into the Radiation Safety Handbook provided all personnel.

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

Very truly yours,

A handwritten signature in dark ink, appearing to read "J. H. Fattig". The signature is fluid and cursive, with a large, sweeping initial "J" and a long, horizontal stroke extending to the right.

cc: A. R. Blough, Site Inspector