

PHILADELPHIA ELECTRIC COMPANY

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SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

(215) 841-5001

October 3, 1983

Docket Nos. 50-277
50-278

Inspection Report Nos. 277/83-20
278/83-20

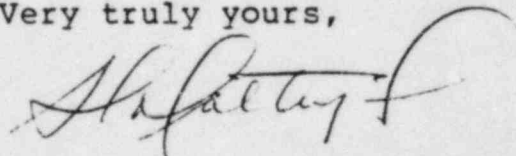
Mr. Thomas T. Martin, Director
Division of Engineering and Technical Programs
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Martin:

Your letter of September 2, 1983, forwarded Combined Inspection Report 50-277/83-20 and 50-278/83-20 concerning Peach Bottom Atomic Power Station.

Activities have been identified which do not appear to be in full compliance with NRC requirements. These violations are restated followed by our responses in Appendices A & B. Appendix B discusses aspects of the physical security at a nuclear power plant; therefore, it is requested that this Appendix be withheld from public disclosure pursuant to Sections 2.790 and 73.21 of 10 CFR. An affidavit in support of this withholding is attached hereto.

Very truly yours,



Attachments

cc: *A. R. Blough, Site Inspector

*Without Appendix B

Appendix B to this letter contains Safeguard Information.

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APPENDIX A

- A.1 Technical Specification 6.8 and Regulatory Guide 1.33 (November 1972) require implementation of procedures for equipment control. Administrative Procedure A-8, Revision 5, March 14, 1983, Procedure for Control of Locked Valves, requires that valves on Locked Valve Lists be locked unless maintenance or operations in progress require otherwise. When a valve on the Locked Valve List previously unlocked for maintenance or operations is restored to the normal condition and locked, Procedure A-8 requires that the restored section of the Locked Valve Log be completed.

Contrary to the above:

- A.1.1 On July 28, 1983, Diesel Fire Pump Discharge Basket Strainer Flush Valve, HV-0421, was not locked. On August 16, 1983, Standby Liquid Control Pump Discharge Hose Connection Valve, HV2-11-32, was not locked. These valves are on Locked Valve Lists and no maintenance or operations requiring them to be unlocked was in progress.
- A.1.2 On April 20, May 16, May 20 and May 21, 1983, locked valves on the Locked Valve List on the Emergency Service Water inlet and outlet of various ECCS room coolers were restored to the normal condition and, as of August 18, 1983, the restored section of the Locked Valve Log was not completed.

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

Response to Violation A.1.1 and A.1.2:

On July 28, 1983, and August 16, 1983 after inspector notification of properly positioned but unlocked valves HV-0421 and HV-2-11-32 respectively, station personnel promptly locked each valve. The cause of each occurrence was individual personnel error because prior surveillance and valve lineup testing had certified the proper positioning and locking of each valve.

After each valve was correctly locked, Locked Valve Check-Off Lists were completed twice on both units. No additional deficiencies were identified. A letter to operations personnel concerning locked valves and the use of the Locked Valve Log was read at the shift meeting and posted. These corrective actions were initiated the same day as the event.

Those individuals involved who were identified were counselled on the proper completion of check-off lists and on Administrative Procedure A-8, Procedure for the Control of Locked Valves.

The event involving the properly positioned, locked valve on August 18, 1983, occurred because of a misunderstanding of the interface between the Procedures for the Control of Locked Valves and Local Blocking Permits. After inspector notification of the incomplete Locked Valve Log entries, the associated Blocking Permits were immediately reviewed and the restored section of the Locked Valve Log was properly completed. Oral warnings were given to the individuals involved for failure to comply with the requirements of the Administrative Procedure for the Control of Locked Valves.

In addition to the corrective action taken for each event, keys for locked valves have been tagged to indicate that a Locked Valve Log entry is required. The Auxiliary Operator qualification manual now requires that the Procedure for the Control of Locked Valves, the color code used to indicate proper valve position, and the Locked Valve Log be discussed with the trainee. Locked Valve Log Appendices A-8A, A-8B, and A-8C are now required to be completed by each trainee before qualification to Auxiliary Operator.

- A.2 10 CFR 19.11, Posting of Notices to Workers, requires posting, within two working days after receipt, of any Notice of Violation involving radiological working conditions.

Contrary to the above, as of 4:00 p.m., August 12, 1983, a Notice of Violation dated July 20, 1983, involving radiological working conditions and received by the licensee on August 1, 1983, had not been posted.

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

Response to Violation A.2:

As stated in the inspector's report, when informed by the inspector, the licensee promptly posted the notice. This occurrence was caused by an administrative oversight. Philadelphia Electric Company has established a new mechanism to ensure immediate posting upon receipt of Notice of Violations involving radiological working conditions.

- A.3 10 CFR 20 requires High Radiation Areas, i.e., areas accessible to personnel in which a major portion of the body could receive a dose in excess of 100 millirems in one hour; to be conspicuously posted with a radiation caution symbol and the words, "Caution--High Radiation Area".

Contrary to the above, about 2:40 p.m. on August 18, 1983, a High Radiation Area on the Unit 3 Refuel Floor was not posted with the required symbol and words. Radiation from temporarily stored underwater lighting fixtures existed at a level such that a person could receive a dose of 200 millirems in one hour.

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

Response to Violation A.3:

When notified by the inspector, the area was immediately resurveyed and posted. As indicated in the inspector's report, the area was indicated as having been posted on the latest radiation survey. Investigation is continuing into the possibility that the posting was removed during maintenance activities in the area.

This situation should have been identified and corrected by the health physics control point leader.

The appropriate health physics control point leader was counselled on the importance of ensuring frequent tours of his area of responsibility to detect such conditions.

APPENDIX B

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INFORMATION, NOT FOR PUBLIC
IS INTENTIONALLY LEFT BLANK

COMMONWEALTH OF PENNSYLVANIA :

: SS.

COUNTY OF PHILADELPHIA :

S. L. Daltroff, being first duly sworn, deposes and states as follows:

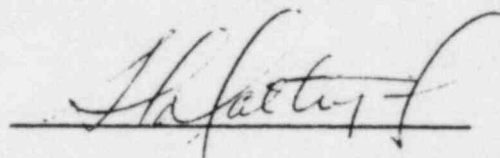
1. He is Vice President - Electric Production Department, of Philadelphia Electric Company (hereinafter referred to as the "Company"); he is authorized to execute this Affidavit on behalf of the Company; and he has read Appendicies A and B to the foregoing letter to the United States Nuclear Regulatory Commission, Office of Inspection and Enforcement, containing the Company's response to Combined Inspection Number 50-277/83-20 and 50-278/83-20 (hereinafter referred to as "the Response"), and knows the contents thereof; and the statements and matters set forth in the Response are true and correct to the best of his knowledge, information and belief.

2. Appendix B to the Response which is sought to be withheld from public disclosure, contains Safeguards Information and details of the physical security plans for Peach Bottom Atomic Power Station.

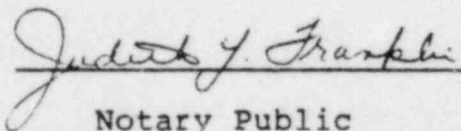
3. To the best of his knowledge, information and belief, the information set forth in Appendix B has been treated as

Safeguards Information and confidential and proprietary information and has been withheld from public disclosure by the Company in accordance with the Company's practice of treating all information dealing with the details of security procedures as confidential and proprietary information.

4. Appendix B to the Response should be considered by the Nuclear Regulatory Commission as confidential and proprietary information and be withheld from public disclosure on the grounds that it contains Safeguards Information and details of the physical security plans of a licensed facility, such disclosure is not required in the public interest, and such disclosure would adversely affect the interest of Philadelphia Electric Company.



Subscribed and sworn to
before me this 3RD day
of OCTOBER, 1983



Notary Public

Notary Public, Philadelphia, Philadelphia Co.
My Commission Expires July 28, 1987