

# PHILADELPHIA ELECTRIC COMPANY

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August 16, 1984

Docket No. 50-352

Inspection Report No. 50-352/84-25

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 July 17, 1984, T. T. Martin, NRC, to J. S. Kemper, PECO, forwarded Inspection Report No. 50-352/84-25. Appendix A to your letter addresses an apparent violation of NRC requirements. This item is restated below along with our response.

Criterion V of 10 CFR 50, Appendix B, requires that activities affecting quality shall be prescribed by procedures appropriate to the circumstances and shall be accomplished in accordance with those procedures.

Administrative Directive 6.1-6, System/Component Turnover to PECO, Paragraph 5.5 states that upon acceptance of the turnover, Startup personnel will place green tags on equipment within the boundaries of the turnover and that, at completion of green tagging, no blue construction tags with the exception of NCRs, CRs, identification tags or Bechtel "Red" tags at boundary points shall remain in place. If personnel protection is deemed necessary after turnover, Bechtel Construction safety tags shall be placed on boundary equipment. Additionally PECO safety tags shall be placed on boundary equipment included in the turnover.

Contrary to the above, on May 24, 1984, it was observed that components such as valves, motor operators, pumps etc., with the exception of electrical switches and breakers, within the boundaries of the Residual Heat Removal Service Water (RHRSW) System Turnover No. 1-16A-1(F) completed on May 4, 1984, had not

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been green tagged nor had blue construction tags been removed. In addition, two boundary valves HV-2-12 and HV-2-13, which isolate the RHRSW system from the Unit 2 cooling tower and which were included in the turnover, had Bechtel Construction boundary safety tags in place but the additional PECO safety tags had not been placed on the valves.

This is a Severity Level V violation (Supplement II).

#### Response

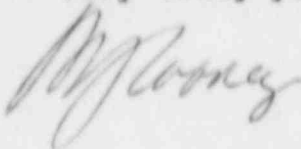
Based on the results of previous PECO Engineering & Research Department Quality Assurance Section auditing of system tagging, it is our belief that inadequate status tagging of this system was an isolated incident.

Upon notification by the NRC, Quality Assurance performed an audit which reaffirmed the situation and resulted in the issuance of an NCR having five open items. The responsible System Startup- Engineer walked down the equipment within the boundaries of the RHRSW System Turnover No. 1-16A-1(F) and assured that valves, instruments, switches, and components were properly tagged and corrected the items cited in the NCR. Upon completion, the system was walked down again by the Startup Group Supervisor and the System Startup Engineer to verify that all necessary (green, blue or safety) tagging was complete and proper.

In order to prevent recurrence of this isolated incident, the System Startup Engineer (SSE) for the RHRSW System reviewed the Administrative Directives (AD 6.1 and AD 2.2) associated with turnover tagging and a discussion was held to assure that the SSE understood the procedure. The Startup QC organization also issued a Startup Training Bulletin (TB No. 84-XXXIII, 5/25/84) to System Startup Engineers on the subject of green tagging in order to reinforce previous training and prevent further difficulties.

If you should have any questions, please do not hesitate to contact us.

Very truly yours,



cc: J.T. Wiggins, Site Inspector  
See Attached Service List

cc: Judge Lawrence Brenner  
Judge Peter A. Morris  
Judge Richard F. Cole  
Troy B. Conner, Jr., Esq.  
Ann P. Hodgdon, Esq.  
Mr. Frank R. Romano  
Mr. Robert L. Anthony  
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Atomic Safety & Licensing Appeal Board  
Atomic Safety & Licensing Board Panel  
Docket & Service Section (3 copies)  
Timothy R. S. Campbell