



PEACH BOTTOM—THE POWER OF EXCELLENCE

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PEACH BOTTOM ATOMIC POWER STATION
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June 1, 1992

Docket Nos. 50-277
50-278

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

SUBJECT: Peach Bottom Atomic Power Station - Unit 2 & 3
Response to Notice of Violation 92-08-01 (Unit 2 and 3)
(Combined Inspection Report Nos. 50-277/92-08; 50-278/92-08)

Dear Sir:

In response to your letter dated April 17, 1992, which transmitted the Notice of Violation in the referenced inspection report, we submit the attached response. The subject inspection concerns a Radiological Environmental Monitoring Program (REMP) inspection that was conducted March 23-27, 1992, and March 31, 1992. The date of response to the Notice of Violation was changed to allow thirty days after receipt of the transmitted notice, which arrived April 30, 1992. This agreement was made with Al Fulvio, Regulatory Supervisor and James Joyner, Chief-Facilities Radiological Safety and Safeguards Branch on May 6, 1992.

If you have any questions or require additional information, please do not hesitate to contact us.

Sincerely,

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PDR ADOCK 05000277
PDR

JE01

cc: R. A. Burricelli, Public Service Electric & Gas
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J. J. Lyash, USNRC Senior Resident Inspector
T. T. Martin, Administrator, Region I, USNRC
H. C. Schwemm, Atlantic Electric
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C. D. Schaefer, Delmarva Power

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RESTATEMENT of VIOLATION

Section 4.8.E.1 of the Technical Specifications for Units 2 and 3 states, in part, that "The radiological environmental monitoring samples shall be collected at the locations ... as specified in Table 4.8.3.a and Offsite Dose Calculation Manual (ODCM). If equipment malfunction occurs, an effort shall be made to complete corrective action prior to the end of the next sampling period."

Contrary to the above requirements, the ODCM specified composite water sampler at the intake had been inoperable during the period August 30, 1991, to March 19, 1992, and the specified composite water sampler at the discharge had been inoperable since August 8, 1991, and remains inoperable at the time of this inspection conducted March 23-27, 1992. The licensee's efforts to complete corrective action prior to the next sampling period were ineffective.

This violation has been categorized as a Severity Level V (Supplement IV).

Corrective Steps Which Have Been Taken and the Results Achieved

An action request was initiated for the intake composite water sampler on November 7, 1991. The intake composite water sampler was cleaned, repaired and returned to service on March 19, 1992.

An action request was initiated for the discharge composite water sampler on August 24, 1991. The discharge composite water sampler was repaired and returned to service on May 26, 1992.

During the period the intake and discharge composite water samplers were out of service, composite samples were taken manually and used to perform a monthly gamma isotopic analysis as required by Tech Spec. Table 4.8.3.A. These samples were collected on a daily basis to ensure compliance with the Radiological Environmental Technical Specifications in lieu of every two hours as noted in the table. The daily sampling criteria is established in Chemistry Procedure ST-C-095-835-2, "Circulating Water Intake and Discharge and Composite Sampling", and is consistent with the guidance provided in Tech Spec 4.8.E.1. Additionally, the daily sampling frequency is supported by previous operating history at Peach Bottom where no elevated radiological releases in our routine effluent have been identified using either automatic or manual composite sampling.

In reviewing the Technical Specification criteria, it states that "if equipment malfunction occurs, an effort shall be made to complete corrective action prior to the end of the next sampling." In accordance with this guidance, action requests were generated to resolve the malfunctioning pieces of equipment. However, there is no LCO associated with this step of the Technical Specifications and therefore a lower priority was attached to the action request.

Corrective Steps Which Will be Taken to Avoid Future Violations

Actions are being taken to properly identify and categorize priority with respect to Environmental Tech Specs to ensure that the composite samplers and other environmentally related sampling equipment are repaired within a reasonable time. Once the equipment is identified, it will be recorded in the Plant Information Management System (PIMS) with appropriate references to ensure timely repair.

Date Full Compliance Will Be Achieved

Full compliance was achieved on May 26, 1992, when both the intake and discharge composite samplers were operational.