

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-5001

SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

July 9, 1985

Docket Nos. 50-277
50-278

Dr. Thomas E. Murley, Administrator
Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

SUBJECT: 1985 Systematic Assessment of Licensee
Performance (SALP) for Peach Bottom
Atomic Power Station

REFERENCE: SALP Report No. 50-277/85-99
50-278/85-99

Dear Dr. Murley:

The report referenced above is the 1985 Systematic Assessment of Licensee Performance (SALP) report of our Peach Bottom Atomic Power Station (PBAPS) facility for the period January 1, 1984 through March 31, 1985.

On June 12, 1985, a joint meeting of the NRC Region I SALP Board and Philadelphia Electric Company management was held at the Peach Bottom Atomic Power Station to discuss the findings in the SALP report.

We are pleased to find acknowledgement in the report that Philadelphia Electric Company demonstrated a noticeable improvement in maintenance, fire protection and housekeeping. Since the last SALP report, we have intensified our efforts in many areas, but have been hampered by the extended outage for replacement of IGSCC sensitive primary system piping.

Philadelphia Electric Company appreciated the opportunity to meet with the NRC to discuss the SALP report and

8507150493 850709
PDR ADOCK 05000277
Q PDR

AE 40 11

to comment on the findings. Based on the discussions at the meeting, we have the following comments:

Plant Operations

The period during which Peach Bottom Atomic Power Station was evaluated included an extended outage to complete complex and difficult pipe replacement modifications. Our current plans include completion of these modifications and plant startup in July, 1985. We anticipate that the completion of these major modifications will allow more of our efforts to be directed toward other areas which require further improvement.

As indicated in the SALP report, training plays an essential role in all areas of plant operations. We have improved in this area, with five training programs having been accredited by the Institute for Nuclear Operations (INPO). These training programs for non-licensed and licensed operators, requalification for licensed operators, and training of health physics and chemistry technicians were accredited by INPO in May 1985. We are committed to a continuous strengthening of our training program and we are confident that further improvement in the training area will increase the efficiency of plant operations.

The SALP report recommends that Philadelphia Electric Company evaluate the causes of the forced outages and unplanned scrams with respect to plant operations, maintenance and testing activities. After further review of the outage summary (Section 5.5 of the SALP report), we believe that the data as presented in the report may not be accurate and may not agree with our records.

The SALP report summarizes the forced outages for the assessment period as follows:

- Unit 2 - 5 forced outages including 2 power reductions and one shutdown for refueling
- Unit 3 - 19 forced outages including 14 power reductions/load level drops

The outage history, as summarized in the SALP report, is not consistent with the data published monthly in NUREG-0020, "Licensed Operating Reactors - Status Summary Report". NUREG-0020 defines outage types as follows:

"...forced outage is an outage required to be initiated no later than the weekend following discovery of an off normal condition. Those outages which do not fit the definition of forced outage ... are scheduled outages...".

For purposes of reporting data for incorporation into NUREG-0020, we use the definitions as stated above. Every shutdown or load reduction is listed in the NUREG-0020 and defines the outage type as being either forced or scheduled. Because BWR's require occasional load reductions to accommodate control rod adjustments, some load reductions are not considered by us to be forced. Based on our records, the outage history for the assessment period utilizing the definitions of NUREG-0020 should have been reported as follows:

	<u>Unit 2</u>	<u>Unit 3</u>
Forced Shutdowns	3	8
Forced Load Reductions	0	2
Total Forced Outages	3	10
 Scheduled Shutdowns	 3	 4
Scheduled Load Reductions	3	9
Total Scheduled Outages	6	13

With regards to the recommendation to evaluate the causes of forced outages and unplanned scrams, we believe we have adequate processes in place which do this evaluation. Unplanned scrams from power are analyzed with our procedure GP-18. The appropriate corrective actions to prevent recurrence of a scram are identified in the associated upset report.

In addition, the Operating Experience Assessment Committee reviews causes of unplanned scrams and forced outages and

recommends appropriate corrective actions to prevent recurrence of the events which caused the scram.

Radiological Controls

The heavy traffic into the power block during this extraordinary outage placed a heavy load on our Health Physics programs and personnel. During the outage, we increased our attention to the radiological protection area and also increased management involvement. However, the amount of attention and involvement appears to have been insufficient to overcome the additional loads created by the outage.

The increased emphasis on the Radiological Protection Program was instrumental in maintaining the Peach Bottom history of no overexposures. During 1984, all exposures were less than 5 Rem. Additionally, during the 15-month pipe replacement outage, only 19 workers received doses in excess of 4 Rem and there were no incidents which resulted in significant internal organ burdens. The original scope of the pipe replacement outage work was accomplished within the ALARA estimate.

During the latter part of the outage, there were two incidents which had a potential for causing higher internal and external exposures. These were caused by a breakdown in administrative controls. These controls were immediately strengthened and were proved effective.

We have also reorganized the health physics and chemistry areas in an effort to further increase management control. Each group is now under the separate, individual direction of a senior-level supervisor. The division of these two activities will provide enhanced management control of both the radiological protection and the chemistry areas.

We have also developed guidelines to be used during future major modification outages. The guidelines include assigning Health Physics/ALARA Technical Assistants (TA's) to each of the major work areas in the plant. These TA's will ensure ALARA considerations are properly reviewed and implemented.

The TA will be responsible for ensuring that an appropriate PWP is used for each assigned job and for monitoring the assigned work area via periodic, frequent work area tours. A conference will also be organized by the TA prior to each job

covered by an RWP to aid in worker awareness. This area supervision will ensure that there is adequate Health Physics support to maintain an effective Radiation Protection Program. We are confident that these changes will preclude the radiological control problems evident during the Unit 2 outage.

Meanwhile we are considering the recommendation for a third party audit in this area to ascertain what further actions may be used to improve performance.

Security and Safeguards

Another area which was affected by the heavy workload due to the demanding tasks of the pipe replacement outage was the area of Security and Safeguards.

During the outage, the capacity of the security computer to monitor alarms was heavily taxed. We noted these difficulties and made changes in the computer software which have improved operation. Additional computer changes are currently being designed which will further benefit the security activities.

With the completion of the Unit 2 outage, along with the subsequent decrease in power block traffic, many of the security areas discussed will no longer be problem areas.

During the SALP period, increases and changes to the contractor security organization were made which we believe will improve security personnel and hardware performance at Peach Bottom. The contractor security force has been strengthened by the addition of an Assistant Trainer and Assistant Supervisor to the contractor staff. Additionally, the contractor security organization has added a special assistant to the PECO Site Security Supervisor for the monitoring of security related hardware.

Management commitment to better and more thorough oversight of contractors is being pursued. We also agree, as stated in the SALP report, that there is a possible need for an Assistant Site Security Supervisor at Peach Bottom. We have recently initiated an effort to fill this position.

Surveillance

Although the SALP report confirms that our surveillance testing program is technically sound and well planned, weaknesses were reported in the implementation and review cycle of the surveillances.

In an effort to improve performance in the surveillance area, we are pursuing, along with other items, further and more efficient use of a computer for tracking the implementation and review cycles.

The SALP report also raised some concerns over the methods we used to track and compute "as found" leak rate values. The methodology used to obtain and account for "as found" leakage rate additions to the ILRT are currently being reviewed by Philadelphia Electric Company.

Fire Protection/Housekeeping

Fire barriers were reported as being a continuing weakness. We have acknowledged these weaknesses and have moved promptly to improve in this area. The Engineering and Research Department has instituted a Fire Protection Review Checklist to be used for all plant modifications in order to evaluate the impact of each new modification on the fire barriers.

Further, fire barrier and penetration seal identification signs have been installed to allow personnel to be more aware of fire barrier requirements at the plant.

The door closure problems have been investigated. Some of the closure problems have been attributed to the nearly completed penetration seal program. Now that the penetrations are sealed, rooms are significantly more air tight which causes a greater pressure differential across the door than previously existed. Since this new differential pressure problem across doors has been recognized, we are pursuing possible corrective modifications.

Emergency Preparedness

Some problems were identified in the January, 1985 inspection and were included in the SALP report. One of these problems, as stated, concluded that the appendices to the emergency plan that contains the names and telephone numbers of

personnel to be contacted during an emergency were seventeen months overdue for a review/update.

Each change to the body of a procedure requires that the revision number of the procedure be changed. Only this revision number was reviewed during the January inspection and not all of the documentation including the surveillance documentation was reviewed.

An internal review indicates that the telephone list was surveillance reviewed for correctness every quarter of 1983 and 1984 and at that time no changes which would require PORC approval (and thereby require a new revision number) were necessary.

Because the revision number of the emergency plan procedure was not changed, the inspector concluded that the quarterly update had not been accomplished, when in fact the quarterly update had been completed and documented every quarter during the previous twenty-four months by way of the surveillance tests.

We are presently in the process of revising the procedures to allow easy identification of the quarterly review of telephone numbers.

License Activities

The SALP report recommends that we pay more attention to the structuring of our licensing staff in order to accommodate the additional efforts required by the Limerick facility.

We have recently increased our licensing staff and have added another senior-level engineer. The licensing staff was also reorganized to accommodate the Limerick plant under the separate supervision of a senior engineer.

We fully expect that the reorganization and the additional staffing will improve our response and resolution time of license issues for Peach Bottom.

Conclusion

Two areas stand out in the SALP report as requiring more attention than others: Radiological Controls and Security/Safeguards. The recommendations in both of these

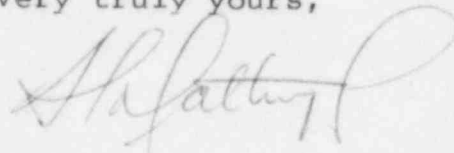
Dr. Thomas E. Murley

July 9, 1985
Page 8

areas include increased management attention and efforts to ensure improvement. Philadelphia Electric Company is moving to correct these deficient areas and we are confident that the next assessment will confirm the corrected conditions.

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

Very truly yours,

A handwritten signature in cursive script, appearing to read "T. E. Murley", written in dark ink.

cc: T. P. Johnson, Resident Site Inspector