

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

(215) 841-5001

July 1, 1985

Docket Nos. 50-277
50-278

Inspection Report: 50-277/85-03
50-278/85-03

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

Dear Mr. Martin:

Your letter dated May 31, 1985 forwarded Combined Inspection Report 50-277/85-03; 50-278/85-03 for Peach Bottom Atomic Power Station. Appendix A of your letter addresses two items which do not appear to be in full compliance with Nuclear Regulatory Commission requirements. These items are restated below followed by our responses.

Violation (1)

Changes to the Emergency Preparedness Program

Section 9.2 of the Peach Bottom Emergency Plan states: "A specific procedure listing emergency telephone numbers shall be updated at least quarterly". 10 CFR 50.54(q) requires a licensee to follow and maintain emergency plans.

Contrary to the above, the inspector found that implementing procedure EP-209, Revision 7, "Telephone List for Emergency Use", had not been updated in accordance with the Plan. The procedure, EP-209, had not been updated as follows: Appendices D-6 and G overdue 17 months; Appendices A, F, J, K and N overdue 15 months; and Appendices E and H overdue 9 months.

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Response (1)

Denial/Evaluation of Apparent Violation

Quarterly review of the emergency telephone listings contained in the Appendices to EP-209 is performed in accordance with the requirements of surveillance test ST/EP-12, "Emergency Telephone List (EP-209) Review" and is required by the Peach Bottom Emergency Plan Section 9.2. During the inspection, it appears that the inspector did not have an opportunity to review the completed ST/EP-12 surveillance test documentation. Subsequently, Philadelphia Electric Company Emergency Preparedness personnel reviewed the ST/EP-12 documentation packages for 1983 and 1984 and determined that the required telephone lists were reviewed on the following dates: 3/15/83; 5/26/83; 8/23/83; 11/22/83; 2/24/84; 5/29/84; 8/31/84 and 12/3/84, and it was determined that no changes requiring PORC approval were necessary. Consequently, EP-209 was not processed to change its revision number. Consequently, it appears that Section 9.2 of the Emergency Plan was met.

Therefore, Philadelphia Electric Company respectfully requests NRC to reconsider this violation.

Reason for Apparent Violation

Peach Bottom Atomic Power Station administrative procedure A-1, Revision 5, requires that the revision number of a procedure shall be increased by one (1) when a procedure is revised and approved by the Plant Operations Review Committee (PORC) for issuance.

ST/EP-12 requires that changes to procedure EP-209 proper, or additions, deletions or changes of names or responsibilities contained in the Appendices to be PORC approved. Corrections to addresses or phone numbers in the Appendices may be handled as an administrative staff function without the need for PORC approval. However, the Appendices in such cases must be reviewed and signed by the Superintendent or his alternate for documentation. Because the Appendices to EP-209 did not reflect a revision number to verify completion of the quarterly telephone list review, it could be assumed that the review was not performed in accordance with Section 9.2 of the Emergency Plan.

Corrective Action Taken

In order to more readily verify the last quarterly review date of the telephone listings contained in the Appendices to EP-209, ST/EP-12 will be modified to require that the latest review date be entered in the Emergency Plan Procedures Index. This change to ST/EP-12 will be completed by July 26, 1985.

Violation (2)

Emergency Plan and Procedure Training

Section 8 of the Emergency Plan, dated December, 1983, states: "Qualification to assume an emergency organization position is met by virtue of holding the designated position in the Corporate or Plant staff organization and by completion of the training required by Table 8.1." Table 8.1 describes the general areas of training required for the Emergency Organization Positions for "Initial Training" and also for "Annual Retraining". 10 CFR 50.54(q) requires a licensee to follow and maintain emergency plans. The document, "Emergency Plan Training Program", contains a training matrix that specifies the training lesson plans required for each response organization position. The lesson plans are noted as being either "detailed" or "abbreviated".

Contrary to the above, the inspector found that for the calendar year 1984 members of the emergency response organization had not received training as stated in the Plan. The following are results from the review of 35 records from members of the emergency response organization: 11 persons had no Lesson Plan (LP) training; 14 persons had missed 3 detailed LP training sessions; 3 persons had missed 2 detailed LP training sessions; 2 persons had missed detailed LP sessions; and only 5 persons had received all the LP training described in the Peach Bottom Emergency Plan. No records were available for the abbreviated plans (LP's) described in the E-Plan.

Response (2)

Admission of Alleged Violation

Philadelphia Electric Company acknowledges the violation as stated above.

Reason for Violation

These violations occurred during a period when the Emergency Plan Training Program was undergoing some reorganization. A new person assumed the position of Site Emergency Planning Coordinator as part of this reorganization. Furthermore, the responsibility for emergency plan training was being transferred from the Emergency Preparedness Section to the Nuclear Training Section. It is apparent that during this period, training records were not adequately maintained.

Significance of Violation

The extent of this violation is minimal. The successful completion of the annual exercise provides assurance that personnel were capable of performing their emergency plan responsibilities.

Corrective Action Taken and Results Achieved

In July, 1985 a revised emergency plan training program document will be issued indicating the complete emergency preparedness training requirements for Peach Bottom Atomic Power Station. This training program description includes a matrix indicating the emergency response positions and the training required for those positions. Additionally, this training matrix identifies lesson plans required including detailed and abbreviated lesson plans. Existing lesson plans have been revised and are being approved in accordance with the Nuclear Training Section Manual. Classes are being scheduled for approved lesson plans. Additional classes will be scheduled when remaining lesson plans complete the approval process.

To ensure emergency plan training requirements are met, personnel assigned emergency response roles will receive training prior to the next annual emergency response exercise scheduled for October 17, 1985. This training is scheduled to be completed by September 20, 1985. Thereafter, retraining will be conducted on an annual basis. Following the October exercise, new personnel assigned emergency response roles will receive initial training and then follow the annual retraining schedule.

Corrective Actions Taken to Avoid Future Non-Compliance

The Nuclear Training Section, which is responsible for emergency plan training and maintaining training records,

has implemented a tracking system containing a matrix of personnel holding emergency response positions and the training requirements for those positions. Using this tracking system, personnel will be informed when training is required and the appropriate schedule of classes. Schedules have been distributed for the initial training presently in process. As personnel complete classes, attendance records and quiz results are reviewed. Information is then included in the tracking system to indicate the successful completion of training for an individual.

Date When Full Compliance Will Be Achieved

Training of emergency personnel by September 20, 1985 and the present implementation of the training records tracking system completes corrective actions for this violation.

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

Very truly yours,



cc: Dr. T. E. Murley, Administrator, Region I, USNRC
T. P. Johnson, Resident Site Inspector