

APPENDIX A
NOTICE OF VIOLATION

PECO Energy Company
Peach Bottom Atomic Power Station
Units 2 and 3

Docket Nos. 50-277, 50-278
License Nos. DPR-44, DPR-56

During an NRC inspection conducted from September 8 to November 9, 1996, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1996), the violations are listed below:

- A. 10 CFR 50.120 requires, in part, that PECO establish and maintain a systems approach to training program for plant electrical and mechanical maintenance personnel, which includes evaluation of the mastery of tasks.

Contrary to the above, PECO did not establish and maintain a systems approach to training program for plant contractor electrical and mechanical maintenance personnel, which included evaluation of mastery of tasks. Specifically, in each of the examples below PECO had not evaluated the technicians ability to perform the intended safety-related work activities which included: soldering and crimping of electrical connections, and torquing of mechanical connections.

1. In March 1995, a contract technician incorrectly performed a solder connection during a Unit 3 high pressure coolant injection system modification. The connection subsequently failed resulting in inoperability of the high pressure coolant injection system for about 25 hours.
2. In October 1996, work activities involving crimping and torquing were performed by contract electricians during the installation of Modifications 2-P232 and 2-P262.

This is a Severity Level IV violation (Supplement I).

- B. Technical Specification 3.3.1.1 "Reactor Protection System Instrumentation" requires, in part, that while operating in MODE 1, the absolute difference of at least 2 APRM channels per trip system and calculated thermal power shall be within $\leq 2\%$ of rated thermal power, if not, the APRM scram clamp and flow biased scram functions are to be declared inoperable and within one hour TS action statement 3.3.1.1.F (be in MODE 2 within six hours), shall be entered.

Contrary to the above, on October 7, while operating Unit 2 in MODE 1 at approximately 35% reactor power, the absolute difference of at least 2 APRM channels per trip system and calculated thermal power was not within $\leq 2\%$ of rated thermal power, causing the APRM scram clamp and flow biased functions to be inoperable, and within one hour TS Action Statement 3.3.1.1.F was not entered. Specifically, due to an undetected error in the calculation of core thermal power, the APRMs indicated 3.5% of rated thermal power below actual core thermal power, for approximately six hours.

This is a Severity Level IV violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, PECO Energy Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region 1, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at King of Prussia, PA
this 18th day of December 1996