

JUL 29 1985

Docket Nos. 50-277
50-278

Philadelphia Electric Company
ATTN: Mr. S. L. Daltroff
Vice President
Electric Production
2301 Market Street
Philadelphia, Pennsylvania 19101

Gentlemen:

Subject: Inspection Report Nos. 50-277/85-23 and 50-278/85-23

This refers to the routine safety inspection conducted by Mr. D. Florek of this office on June 4, and 9-13, 1985, at the Peach Bottom Atomic Power Station Units 2 and 3, Delta, Pennsylvania of activities authorized by NRC License No. DPR-44 and DPR-56 and to the discussions of our findings held by Mr. Florek with Messrs. R. Fleischmann and D. Smith of your staff at the conclusion of the inspection. This also reflects a subsequent telephone discussion between Mr. D. Florek and Mr. R. Fleischmann on June 19, 1985.

Areas examined during this inspection are described in the NRC Region I Inspection Report which is enclosed with this letter. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector.

Based on the results of this inspection, it appears that one of your activities was not conducted in full compliance with NRC requirements, as set forth in the Notice of Violation, enclosed herewith as Appendix A. This violation has been categorized by severity level in accordance with the revised NRC Enforcement Policy (10 CFR 2, Appendix C) published in the Federal Register Notice (49 FR 8583) dated March 8, 1984. You are required to respond to this letter and in preparing your response, you should follow the instructions in Appendix A.

During the course of this inspection, a conflict was noted with your technical specifications and 10 CFR 50 Appendix J. Technical Specification 4.7.A.2.e. indicates that a failed containment integrated leak rate test (ILRT) measured value may be reduced by local leak rate data, taken before and after repairs, in order to meet the acceptance criteria. It further states that the containment ILRT need not be repeated if the above actions satisfy acceptance criteria. 10 CFR 50 Appendix J does not allow these reductions to meet acceptance criteria and furthermore requires successfully conducting a Type A containment ILRT. It is requested that you respond to the above conflict and submit technical specification changes to resolve this conflict. It should be noted that at no time during the Peach Bottom Unit 2 ILRT did this conflict become an issue since the plant staff was working to the requirements of 10 CFR 50 Appendix J. However, station procedures should be revised to allow only the Appendix J method for meeting the acceptance criteria.

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The responses directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Your cooperation with us in this matter is appreciated.

Sincerely,

Stewart D. Ebnetter, Director
Division of Reactor Safety

Enclosures:

1. Appendix A, Notice of Violation
2. Combined NRC Region I Inspection Report Number 50-277/85-23 and 50-278/85-23

cc w/encls:

R. S. Fleischmann, Station Superintendent
John S. Kemper, Vice President, Engineering and Research
Troy B. Conner, Jr., Esquire
A. J. Pietrofitta, General Manager, Power Production Engineering,
Atlantic Electric
Eugene J. Bradley, Esquire, Assistant General Counsel (Without Report)
Raymond L. Hovis, Esquire
Thomas Magette, Power Plant Siting, Nuclear Evaluations (Without Report)
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
Commonwealth of Pennsylvania

bcc w/encls:

Region I Docket Room (with concurrences)
Senior Operations Officer (w/o encl)
R. Gallo, Chief, Section #2A, RPB#2, DRP
G. Gears, LPM, NRR

RI:DRS
Flores/argb

7/18/85

RI:DRS
Broth

7/19/85

RI:DRS
Bettenhausen

7/24/85

07/24/85