

DEC 20 1985

Docket Nos. 50-277/DPR-44
50-278/DPR-56

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

Gentlemen:

Subject: Combined Inspection 50-277/85-29; 50-278/85-33

This transmits the findings of the routine safety inspection by Messrs. T. P. Johnson, J. P. Rogers, and J. H. Williams, on September 14 - October 25, 1985, at the Peach Bottom Atomic Power Station, Delta, Pennsylvania. These findings were based on observation of activities, interviews, measurements and document reviews, and have been discussed with Mr. R. S. Fleischmann of your staff.

Based on the results of this inspection, it appears that several of your activities were not conducted in full compliance with NRC requirements, as set forth in the Notice of Violation, enclosed herewith as Appendix A. These violations have 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.

As discussed in Appendix A, one issue cited relates to an apparent misinterpretation of NRC reporting requirements under 10 CFR 50.72 and 50.73. We are concerned, not only with the lack of reporting of Unit 3 reactor protection system actuations, but also with the issuance of guidance which modified, in a less conservative direction, a PORC approved Administrative Procedure, which was intended to implement the requirements of 10 CFR 50.72 and 50.73. In addition to your response to the specific violation, please provide us with a discussion of the management controls used to ensure that PORC approved procedures are not revised in a less conservative direction via the issuance of non-PORC reviewed guidance.

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.

A copy of this letter and the enclosures are being placed in the NRC Public Document Room.

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Your cooperation with us is appreciated.

Sincerely,

original signed by

Samuel J. Collins, Chief,
Projects Branch 2
Division of Reactor Projects

Enclosures:

1. Appendix A, Notice of Violation
2. NRC Region I Combined Inspection Report Nos. 50-277/85-29 and 50-278/85-33

cc w/encls:

R. S. Fleischmann, Manager, Peach Bottom Atomic Power Station
John S. Kemper, Vice President, Engineering and Research
Troy B. Conner, Jr., Esquire (Without Report)
Eugene J. Bradley, Esquire, Assistant General Counsel (Without Report)
Raymond L. Hovis, Esquire (Without Report)
Thomas Magette, Power Plant Siting, Nuclear Evaluations (Without Report)
W. H. Hirst, Director, Joint Generation Projects Dept., Atlantic Electric
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 encls)
R. Gallo, Section Chief, DRP

DRP:RI
Williams/mjd

12/18/85

DRP:RI
Johnson

12/18/85

DRP:RI
Gallo

12/18/85

DRP:RI
Collins

12/18/85

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