

APPENDIX A

NOTICE OF VIOLATION

Philadelphia Electric Company
Peach Bottom Units 2 and 3

Docket/License: 50-277/DPR-44
50-278/DPR-56

As a result of the inspection conducted on September 14, 1985 - October 25, 1985, and in accordance with the revised NRC Enforcement Policy (10 CFR 2, Appendix C) published in the Federal Register on March 8, 1984 (49 FR 8583), the following violations were identified:

1. Technical Specification 6.8.1 and Regulatory Guide 1.33, November 1972, require implementation of procedures for surveillance testing.

Surveillance Test Procedure ST 4.9.B, Portal Monitor Calibration and Source Check, requires a quarterly source check and a semi-annual calibration of the portal monitors throughout the plant, including portal monitor number 332.

Contrary to the above from about July 7, 1985 to September 25, 1985, portal monitor number 332 was overdue for calibration and in use at the 165 foot elevation of the administration building bridge, and the semi-annual calibration had not been performed since January 7, 1985.

This is a Severity Level IV Violation (Supplement 1) applicable to DPR-44 and DPR-56.

2. Technical Specification 6.8.1 and Regulatory Guide 1.33, November 1972, require that written procedures and administrative policies be established, implemented and maintained.

Administrative Procedures A-26, Rev. 24 and A-26A, Rev. 2 state that the Control Operators shall prepare blocking permits. Procedure A-2 states that revised Administrative Procedures must contain equivalent, more conservative, or additional requirements to be issued on an expedited basis.

Contrary to the above: 1) In early September 1985, a practice was instituted allowing Plant Operators-Nuclear to prepare blocking permits, and 2) on October 11, 1985 an expedited change to A-26 and A-26A was made, which eliminated the requirement that Control Operators prepare blocking permits, and did not contain equivalent, more conservative or additional requirements.

This is a Severity Level IV Violation (Supplement 1) applicable to DPR-44 and DPR-56.

3. Technical Specification paragraph 4.6.D.4 requires that each main steam safety relief valve be manually opened once per operating cycle with the

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reactor pressure equal to or greater than 100 psig to demonstrate its ability to pass steam. Surveillance Test 10.4, Relief Valve Manual Actuation, implements this requirement.

Contrary to the above no manual test of relief valves 71 B, G, and K were performed on Unit 3 during the operating cycle 6 from September, 1983 to July, 1985.

This is a Severity Level IV Violation (Supplement 1) applicable to DPR-56.

4. 10 CFR 50.72 requires the licensee notify the NRC Operations Center via the Emergency Notification System within 4 hours and 10 CFR 50.73 requires the preparation of a Licensee Event Report of any event or condition that results in manual or automatic actuation of any engineered safety feature, including the reactor protection system.

Contrary to the above, eight (8) reactor protection system actuations occurred between August 29 and October 10, 1985 and, as of October 25, 1985, no reports were made to the NRC.

This is a Severity Level IV Violation (Supplement 1) applicable to DPR-56.

Pursuant to the provisions of 10 CFR 2.201, Philadelphia Electric Company is hereby required to submit to this office within 30 days of the date of the letter transmitting this Notice, a written statement or explanation of reply, including: (1) the corrective steps which have been taken and the results achieved; (2) the corrective steps which will be taken to avoid further violations, and (3) the date when full compliance will be achieved. Where good cause is shown consideration will be given to extending the response time.