

June 4, 1997

Mr. D. M. Smith, President
PECO Nuclear
Nuclear Group Headquarters
Correspondence Control Desk
P. O. Box 195
Wayne, Pennsylvania 19087-0195

SUBJECT: ROUTINE INTEGRATED INSPECTION 50-277/97-02 AND 50-278/97-02

Dear Mr. Smith:

This letter refers to the inspections conducted from March 8 through May 3, 1997, at the Peach Bottom Atomic Power Station, Delta, Pennsylvania. We performed these inspections to determine whether your staff conducted activities authorized by your license safely and in accordance with NRC requirements. At the conclusion of the inspection, Mr. W. L. Schmidt discussed the findings with Mr. G. Edwards and other members of your staff. The inspectors based these findings on independent observation of activities, interviews, and document reviews.

Your staff continued to operate both units safely. The problem identification and corrective actions processes have had positive effects on the operations of the units. Station management provided strong support for implementation of these programs, which included a low reporting threshold and positive self-assessment culture throughout the organization. An area for improvement was noted in documenting the initial performance enhancement process significance levels.

Operators responded well to plant transients and initiated a Unit 3 manual reactor scram when the operating recirculation pump tripped while in single loop operation. We noted, however, that non-safety-related equipment failures continued to cause challenges to the operators. While operators performed well in identifying that a reactor feed pump trip indicating lamp was not lighted, they did not fully review nor understand its significance. The failure to understand the condition, along with problems with the engineering review, led to the Unit 3 C reactor feed pump high level trip being inoperable in excess of the time allowed by technical specifications, without reactor power being lowered to less than 25%. This issue is considered a violation of NRC requirements.

We found that your staff adequately implemented the improved technical specifications, including the relocated items and development of new surveillance requirements. During this review, however, we noted that your station qualified reviewers may not have understood fully the need to review changes posted against the updated final safety analysis report. We consider this an unresolved item, pending further review.

In review of maintenance activities, we found that the modification to the Unit 3 high pressure coolant injection steam line was conducted well and has reduced, but not eliminated, the piping vibration. However, we noted that temporary scaffolding, installed to support work,

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was in contact with or in close proximity to operable safety-related equipment. These installations were outside the analyzed bounds for scaffolding as defined by station procedures and were not previously analyzed by your engineering department. As such, the scaffolding placed the safety-related systems in a condition that was unanalyzed with regard to design. This is also considered a violation of NRC requirements.

The surveillance tests observed were conducted well. However, during review of several systems and associated testing, we found several instances where either the basis for the testing was not fully understood or documented, or where the tests specified to meet technical specification requirements did not fully verify operability. As such, these instances are considered unresolved items, pending further review.

The engineering inspection found a technically competent staff with an attitude of ownership for their assigned responsibilities. Your engineering department properly responded to a high pressure service water leak, analyzing the potential flaw and developing an adequate repair plan. As with the previous emergency service water piping leakage, we remain interested in the cause of this piping leak. This good performance was tempered by the apparent lack of engineering continuity in dealing with the reactor feed pump trip issue discussed above.

Inspectors reviewed the emergency preparedness and security programs, finding that they were well implemented and directed toward protecting public health and safety.

The two violations discussed above are cited in the enclosed Notice of Violation, with the specific circumstances described in the enclosed inspection report. Please note that you are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

We appreciate your cooperation.

Sincerely,

ORIGINAL SIGNED BY:

Richard R. Keimig, Chief
Projects Branch 4
Division of Reactor Projects

Docket/License No. 50-277/DPR-44
50-278/DPR-56

Enclosure:

1. Appendix A, Notice of Violations
2. NRC Inspection Report 50-277/97-02 and 50-278/97-02

cc w/encl:

G. A. Hunger, Jr., Chairman, Nuclear Review Board and Director, Licensing
T. Mitchell, Vice President, Peach Bottom Atomic Power Station
G. Rainey, Senior Vice President, Nuclear Operations
D. B. Fetters, Vice President, Nuclear Station Support
T. Niessen, Director, Nuclear Quality Assurance
A. F. Kirby, III, External Operations - Delmarva Power & Light Co.
G. Edwards, Plant Manager, Peach Bottom Atomic Power Station
G. J. Lengyel, Manager, Experience Assessment
J. W. Durham, Sr., Senior Vice President and General Counsel
J. A. Isabella, Manager, Joint Generation, Atlantic Electric
W. T. Henrick, Manager, External Affairs, Public Service Electric & Gas
R. McLean, Power Plant Siting, Nuclear Evaluations
J. Vannoy, Acting Secretary of Harford County Council
R. Ochs, Maryland Safe Energy Coalition
J. H. Walter, Chief Engineer, Public Service Commission of Maryland
Mr. & Mrs. Dennis Hiebert, Peach Bottom Alliance
Mr. & Mrs. Kip Adams, Peach Bottom Alliance
Commonwealth of Pennsylvania
State of Maryland
TMI - Alert (TMIA)

Mr. D.M. Smith

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