

MAR 07 1988

Docket Nos. 50-277
50-278

Philadelphia Electric Company
ATTN: Mr. J. S. Kemper, Sr.
Vice President
Nuclear
2301 Market Street
Philadelphia, Pennsylvania 19101

Gentlemen:

Subject: Confirmatory Action Letter 86-07

This refers to your letter dated January 13, 1988, in response to our letter dated April 11, 1986.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:
Jacques P. Durr



William V. Johnston
Acting Director
Division of Reactor Safety

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cc:

J. W. Gallagher, Vice President, Nuclear Services
E. C. Kistner, Chairman, Nuclear Review Board
Dickinson M. Smith, Vice President, Peach Bottom Atomic Power Station
Jack Urban, General Manager, Fuels Department, Delmarva Power & Light Co.
John F. Franz, Plant Manager, Peach Bottom Atomic Power Station
Troy B. Conner, Jr., Esquire
W. H. Hirst, Director, Joint Generation Projects Department,
Atlantic Electric
Eugene J. Bradley, Esquire, Assistant General Counsel (Without Report)
Raymond L. Hovis, Esquire
Thomas Magette, Power Plant Siting, Nuclear Evaluations
W. M. Alden, Director, Licensing Section
Doris Poulsen, Secretary of Harford County Council
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
Commonwealth of Pennsylvania

bcc:

Region I Docket Room (with concurrences)
Management Assistant, DRMA (w/o encl)
Section Chief, DRP
Robert J. Bores, DRSS
Public Document Room (PDR)
Nuclear Safety Information Center (NSIC)

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Krasopoulos/ms

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use for
RI:DRS
Anderson

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RI:DRS
Durr

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PHILADELPHIA ELECTRIC COMPANY

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PHILADELPHIA, PA. 19101

(215) 841-5001

JOSEPH W. GALLAGHER
VICE PRESIDENT
NUCLEAR OPERATIONS

January 19, 1988

Docket Nos. 50-277
50-278

Mr. William T. Russell, Administrator
Region I
U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Subject: Peach Bottom Atomic Power Station Units 2 and 3
Special Report: Condition of Non-Conformance
with 10 CFR 50 Appendix R

Dear Mr. Russell:

The purpose of this letter is to report a condition of non-compliance with the design requirements of 10 CFR 50, Appendix R, Section III.G at the Peach Bottom Atomic Power Station Unit 3. This report responds to action 3 required in Confirmatory Action Letter 86-07 dated April 11, 1986 from S. D. Ebnetter (Nuclear Regulatory Commission) to S. L. Daltroff (Philadelphia Electric Company).

The condition of non-compliance was identified when a comparison of documentation generated by Philadelphia Electric Company personnel and our Appendix R contractor revealed an incorrect disposition of cable failures. The operation of equipment required for shutdown in Fire Area 13N is dependent upon these cables.

Condition

The safe shutdown method relied upon for Unit 3 to recover from a fire in Fire Area 13N requires the use of the Reactor Core Isolation Cooling (RCIC) System. An Appendix R assumed fire in Fire Area 13N results in the failure of cables ZA3Q1022G and ZA3Q1022R. A ground on either of these cables

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concurrent with an assumed ground on the battery distribution system results in the opening of the fuses which supply power to the RCIC logic. This loss of power results in the inability to open motor operated valve MO-3-13-132 and the loss of core cooling by the RCIC System.

Significance of Condition

An Appendix R assumed fire in Fire Area 13N would result in the inability to open MO-3-13-132 which is required to provide cooling water for the RCIC turbine lube oil heat exchanger. Since operation of the RCIC turbine requires lube oil cooling, RCIC would not be available in the event of a fire in Fire Area 13N.

Cause of the Condition

The cause for this non-compliance was personnel error in that cable failures were incorrectly dispositioned. These cables are essential for the operation of equipment required for safe shutdown in Fire Area 13N.

Recommended Interim Corrective Action

A fire watch has been established as a result of previously identified and reported Appendix R violations (as required by Technical Specifications) to assure early detection of a fire in Room 444 of Fire Area 13N. Since the plant is in cold shutdown and the RCIC System is only required for hot shutdown, further interim corrective actions are not necessary.

Modifications are in progress which will relocate the cables from Fire Area 13N prior to restarting Unit 3.

Permanent Corrective Action

Modifications to resolve this specific non-compliance will be completed prior to the restart of Unit 3. These modifications will relocate the cables out of Fire Area 13N.

In addition, a complete review of the dispositions of all cable and component failures in all fire areas (Units 2 and 3) is in progress. This review is approximately 80% complete and to date has confirmed that this condition is an isolated case. Any further non-compliance will be reported in accordance with the Confirmatory Action letter.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

Jw Sullivan

cc: Addressee
T. P. Johnson, Resident Site Inspector