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PHILADELPHIA ELECTRIC COMPANY
Peach Bottom Atomic Power Station
Delta, Pennsylvania
17314

April 12, 1979

Mr. Boyce H. Grier
Office of Inspection and Enforcement
Region I
United States Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

SUBJECT: REPORTABLE OCCURRENCE - PROMPT NOTIFICATION

Confirming W. T. Ullrich's conversation with Mr. Greenman, Region I, United States Nuclear Regulatory Commission on 4/12/79.

Reference: Docket No. 50-277/278
Peach Bottom Units 2 and 3
Technical Specification Reference: 6.9.2.a(9)

Report No. 2-79-16/1P
Occurrence Date: April 11, 1979

Identification of Occurrence:

Engineering review of plant valve line-ups indicated the seismically qualified Emergency Service Water (ESW) system was normally connected to a heat exchanger in a non-seismically qualified system (RBCCW).

An Engineering review determined that the valving associated with the ESW supply to the RBCCW system was normally aligned in the open position. This provided a supply of ESW to the RBCCW system during a loss of outside power condition without operator action. The emergency service water system is a seismically qualified system. Reactor building cooling water system is not required to be seismically qualified. The manual valve line-up, therefore, could have resulted in leakage from the emergency service water system if a seismic event resulted in failure of a RBCCW heat exchanger.

Apparent Cause of Occurrence:

The FSAR indicates that the reactor building closed cooling water system remains operable during a loss of power transient in order to supply cooling water to in-containment components during such a transient. The heat exchanger is provided with emergency service water during this period since normal service water pumps are not fed from emergency buses. The FSAR does not address to the seismic qualifications of the RBCCW system. Plant staff incorrectly assumed the reactor building closed cooling water system was seismically qualified. Procedures were therefore written to reduce manual valving operations following loss of power transient. This resulted in a valve lineup which specified that

the emergency service water valves to and from reactor building closed cooling water heat exchangers be opened during normal plant operations.

Analysis of Occurrence:

Significance of this system line-up is considered minimal based on the low probability of a seismic event. Additionally, following a seismic event, operator action could have been taken in sufficient time to maintain the operability of the emergency service water system even if a leak occurred in the reactor building closed cooling water heat exchanger.

Corrective Action:

Valve line-ups were immediately realigned such that ESW valves connecting to the RBCCW heat exchanger were in the closed position. Information sessions were held with shift operators and temporary tags placed in the control room to ensure proper operator response during a loss of power transient.

Long term corrective action will involve review and revision of various malfunction procedures, operational transient procedure and system check-off list.

Since the original valve line-up is preferable, the RBCCW system will be analyzed to determine its performance during a seismic event. Based on this review, plant modification may be made to permit a return to the original operating mode.

Previous Failures:

None similar.

Very truly yours,

W. T. Ullrich, Superintendent
Peach Bottom Atomic Power Station

WTU:llm