

# PHILADELPHIA ELECTRIC COMPANY

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SHIELDS L. DALTROFF  
VICE PRESIDENT  
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February 28, 1980

Re: Docket Nos.: 50-277  
50-278

Inspection No.: 50-277/79-29  
50-278/79-32

Mr. Eldon J. Brunner, Chief  
Reactor Operations & Nuclear Support Branch  
US Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

Dear Mr. Brunner:

Your letter of February 8, 1980, forwarded combined Inspection Reports 50-277/79-29 and 50-278/79-32. Appendix A to your letter addresses two items as not appearing to be in full compliance with Nuclear Regulatory Commission requirements. Both items are infractions and are restated with our responses.

- A. Technical Specification 6.1.1, "Radiation Protection Program", requires that procedures for personnel radiation protection shall be prepared consistent with requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel exposure. Health Physics Procedure HPO/CO-4, "Radiation Work Permits", revision 13, dated March 20, 1979, requires in part in Section VI that all personnel who desire to enter the area covered by the RWP shall read and be familiar with the data and the instructions on the RWP, sign their own name, and provide name, date, .... time in, dosimeter reading, ....

Contrary to the above requirement, on November 8, 1979, one individual from the operations staff entered the Unit 3 165 foot elevation turbine and turbine hall areas for an

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inspection without signing in or providing appropriate data required by RWP 3-I-5 governing such inspection entries. (Recurrent item).

Response

On November 8, 1979, during the startup of Unit 3, a verbal report of a steam/water leak on the high pressure turbine inlet piping was received by Shift Supervision. A member of the operations staff entered the area to investigate a potentially serious problem; however, he failed to sign the posted RWP.

The observed leakage was not serious and no additional action was required immediately. Total exposure to the person involved was approximately 10 mRem.

Reference has been made to Inspection Report 79-23/25 as being similar to this occurrence. Item 3 of Appendix A of that report involved persons performing routine work in an area of low radiation which was controlled by an RWP, without signing in on the RWP. The recent occurrence involved a knowledgeable individual who took appropriate safety and HP precautions and entered an area of potential high radiation with a portable instrument for measuring dose rate. The decision to enter the area was made after a judgment that a potential emergency situation could have existed and that there was a need for immediate action.

Based on the precautions which were taken, the health and safety of the individual were not compromised. The operations staff and operating personnel have been reminded of the importance of following the RWP procedures at all times.

Procedure HPO/CO-4 contains certain provisions for entering a radiation area to expedite work or inspections without filling out the RWP first. In order to clarify the circumstances for which an expedited entry is permissible, a review of the procedure will be performed and appropriate revisions made as required.

- B. 10 CFR 10 Appendix B, Criterion XVI, states in part:  
"Measures shall be established to ensure that conditions adverse to quality, such as failures, ... are promptly identified and corrected ... ."

Contrary to the above, a cable tray penetration (Nomenclature ZB2MV180), located in the Unit 2 Reactor Building 135 foot elevation was found on November 8, 1979, to have a broken seal which compromised the seal and fire protection capability. Additionally, the seal enclosure contained trash and debris, constituting a potential fire

hazard. This seal had last been inspected on April 23, 1979, and no measures or licensee inspection had identified and corrected this penetration inadequacy.

Response

The fire seal on the cable tray penetration was opened on April 23, 1979, as part of a new cable installation for the security system. This penetration was documented as being temporarily sealed on April 23, 1979, in accordance with Construction Division Implementing Procedure 16 (CDIF-16). A temporary seal was used because of the uncertainty involved with the routing of additional security system cables in this area. Permission for extended use of the temporary seal for more than 48 hours was obtained from shift supervision and documented as required. The temporary seal was apparently damaged after installation and as a result, the exposed enclosure was later found to contain trash and debris.

After discovery of the broken fire seal, Construction Division personnel removed the trash and debris from the floor penetration and permanently resealed the tray. The fire seal was inspected and accepted the following day, November 9, 1979, in accordance with CDIP-16.

The deficiency of Procedure CDIP-16 to require documented periodic follow-up inspections of temporarily sealed penetrations led to this infraction. Therefore, procedure CDIP-16 will be revised by March 31, 1980, to require a documented weekly review and inspection to assure the integrity of all temporarily sealed penetrations.

Operations shift personnel have also been requested to inspect fire seals as part of the periodic inspections of assigned plant areas required by Administrative Procedure A-30. The "Request for Housekeeping" form has been revised to remind the operator to check fire seals and list those which are damaged.

Very truly yours,

