

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

JOSEPH W. GALLAGHER
MANAGER
ELECTRIC PRODUCTION DEPARTMENT

(215) 841-5003

March 31, 1980

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

Inspection No.: 50-277/80-02
50-278/80-02

Mr. Robert T. Carlson, Chief
Reactor Construction and Engineering Support Branch
US Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Carlson:

Your letter of March 6, 1980, forwarded combined Inspection Report 50-277/80-02 and 50-278/80-02. Appendix A to your letter addresses one item which did not appear to be in full compliance with Nuclear Regulatory Commission requirements. This item is categorized as an infraction and is restated below with our response.

Technical Specifications Section 3.14.D.1 states in part that: "Penetration fire barriers protecting the following areas shall be functional... Diesel Generator Rooms... Control Room..." Technical Specifications Section 3.14.D.2 states in part that: "If the requirements of 3.14.D.1 cannot be met, establish a continuous fire watch on at least one side of the affected penetration within 1 hour."

Contrary to the above, on January 10, 1980, unsealed penetrations through fire barrier walls were observed in the Diesel Generator Room and in the Control Room without the benefit of fire watch in the affected areas.

This item is an infraction.

Response

As soon as the problem was identified, a continuous fire watch was posted in the diesel generator building as required by Technical Specification 3.14.D.2 until the four mechanical penetrations were permanently sealed on January 10, 1980.

Control room personnel were notified of the improperly sealed penetration between the cable spreading room and the control room, and acted as the continuous fire watch as required by Technical Specification 3.14.D.2 until the penetration was temporarily sealed on January 10, 1980. The penetration was permanently sealed on March 19, 1980.

The current procedure for control of temporary seals installed on penetrations has been revised to include a documented weekly inspection of all temporary seals. This revised procedure will be effective as of April 1, 1980.

The surveillance test which verifies the integrity of fire barriers in areas specified in Technical Specification 3.14.D.1, did not include the cable penetration fire barrier described above and had not previously included mechanical penetrations. It will be revised to include these items by June 1, 1980. As a part of this revision, a survey has been made of fire barriers on mechanical penetrations and the deficiencies found have been temporarily sealed and will be permanently sealed by April 14, 1980. The temporary seals will be subject to the weekly inspection until they are made permanent.

Very truly yours,

JW Ballaghen