PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-5001

SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

April 28, 1980

Re: Docket Nos. 50-277
50-278

Inspection No.: 50-277/80-04
50-278/80-04

Mr. Boyce H. Grier, Director
US Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Grier:

Your letter of April 3, 1980 forwarded combined Inspection Reports 50-277/80-04 and 50-278/80-04. Appendix A to your letter addresses items which did not appear to be in full compliance with Nuclear Regulatory Commission requirements. These items are categorized as infractions and are restated below with our response.

A. echnical Specification 6.8, "Procedures" states in part, that "Written procedures and Administrative policies shall be established, implemented and maintained that meet the requirements of...Appendix A of...Regulatory Guide 1.33 (November 1972). Regulatory Guide 1.33, Section D.10 references procedures for maintaining containment integrity". Further, each procedure and administrative policy...shall be reviewed by the PORC and approved by the Station Superintendent...prior to implementation...."

Contrary to the above, on February 22, 1980, a Round Sheet designed to assure containment integrity through administrative control of the seismically qualified nitrogen supply to containment ventilation valves was

used without incorporation into system procedures and without PORC review and approval.

Response

The Round Sheet was incorporated into a daily Surveillance Test (ST), ST 7.9.2, on March 4, 1980, after PORC review and approval. This ST provides daily verification of nitrogen bottle and regulator pressure on the seismically qualified nitrogen supply to containment ventilation valves.

B. 10 CFR 50, Appendix B, Criterion XVI, "Corrective Action" states in part, "Measures shall be established to assure that conditions adverse to quality...are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

Contrary to the above, on January 3, 1980, with Unit 2 in power operation and the drywell being de-inerted, two drywell ventilation valves were fully opened; and no procedural requirements had been imposed to restrict opening of containment ventilation sytem valves to an opening whereby closure against post LOCA conditions is assured. Further, the engineering review and identification of this deficiency had been completed on March 2, 1979 and corrective action described in Philadelphia Electric Company's letter to Region I dated March 29, 1979 stated that openings of these valves are restricted, so the valves will only open to 30 degrees and that these operations were addressed in a system procedure.

Response

When the valves were discovered to be fully open, they were immediately readjusted to less than 37 degrees open. The valves had been in the full open position for approximately eight hours. On January 3, 1980, cautionary tags stating the correct operating pressure were placed on the air supply regulator for each drywell ventilation isolation valve. Procedural changes were made on February 21, 1980 to include:

a. A requirement to maintain the output of the air supply regulating valve at zero psig during reactor operation, except while inerting or de-inerting the drywell.

b. A clear explanation stating that raising the air supply above the specified value can cause the valve to open

greater than 37 degrees, removing assurance of closure during a LOCA.

As discussed in LER 2-80-1/1X-1 Narrative Description, long term modifications to the containment isolation valves are being developed.

In March 1979, after the valve closure on high differential pressure problem was identified, discussions were held with shift personnel to inform them of the 30 degree opening limitation on containment ventilation isolation valves due to high differential pressure qualification constraints. Although the operators were instructed to open the valves a maximum of 30 degrees by regulating the supply air pressure, procedures to set and restrict the valves to this limit were not generated at that time.

As noted in this Combined Inspection Report 50-277/80-04 and 50-278/80-04, there were inconsistencies in the originally submitted LER 2-80-1/1T. After the Combined Inspection, a revised LER Narrative Description was submitted which corrected the event date to December 31, 1979, not January 3, 1980, as stated in B, above.

C. Technical Specification 6.8.1 states in part, "Written procedures and administrative policies shall be established, implemented and maintained..."

1. Procedure A-14 "Plant Modification", Revision 6, dated August 5, 1978, and subsequent revisions, states in part, "The Modification Coordinator shall ensure that all aspects of the design control have been initiated by use of the PCMS. He shall document the need for procedure, blocking sequence, and drawing revisions on the PCMS."

   Contrary to the above, the need for required procedural revision was not documented on the Plant Modification Control Sheet (PCMS) for Modification 510(79-29), a modification initiated March 16, 1979.

2. Procedure A-14, "Plant Modification" Revision 6, dated August 8, 1978 and subsequent revisions states in part, "An independent design review of proposed nuclear safety related modification shall be performed and documented by signing the design review provision of the PCMS."

   Contrary to the above, the design review provision was not signed on the PCMS for Modification 510

(79-29), a safety related modification initiated March 16, 1979.

3. Procedure A-26, "Procedure for Corrective Maintenance", a Revision 21, dated February 14, 1980, states in part, "Use of MRF:...Copy 2 shall be forwarded to the Control Operator.... The Control Operator shall...prepare...the permit (Form 196-21057) Philadelphia Electric Company Operating Handbook, Permits and Blocking). If the Technical Specification "yes" block has been checked, on the Permit Line Marked "apparatus" write the words "Tech Spec"..

   Contrary to the above, Local Permit (Form 196-21057) number 3-7C9-81, initiated on February 19, 1980, did not stipulate "Tech Spec", even though the Technical Specification "yes" block was checked on the associated MRF.

4. Philadelphia Electric Company Station Operating Handbook-Permits and Blocking, Section 140A., Reprinted 1974, "Application of Blocking" states in part, "The Supervisor or his authorized representative doing the blocking must take the original copy of the permit with him, perform each item of blocking in the sequence entered on the permit, tag and record each item as it is done...."

   Contrary to the above, on February 20, 1980, the individual performing the block associated with Local Permit #3-7C9-81 did not perform each item of blocking entered on the permit in that a different valve was closed and tagged in place of one of the valves required by the permit.

Response

Item 1. The PMCS for this modification was corrected April 18, 1980 to reflect the need for procedural revision. The procedural revisions required by this modification were made by February 25, 1980. Other actions planned to avoid further items of this nature are included in the final Response Section, dealing with management control.

Item 2. The design review for this and for every major modification is performed off-site by the Philadelphia Electric Company Engineering & Research Department in accordance with their own internally approved procedures. The intent of procedure A-14 is to document on the PMCS only design review for minor modifications generated on site. Within 60 days, procedure A-14 will

be revised to reflect the need for the PMCS to serve as a point of documentation for design review for minor modifications only.

Item 3. The omission of the "Tech Spec" stipulation on Local Permit (Form 196-21057) number 3-7C9-81 was determined to be caused by inadequate attention to the specific requirements of the associated MRF. The responsible Control Operator was individually counseled as soon as the cognizant supervising engineer was made aware of the deficiency. Additionally, all Control Operators have been re-instructed at shift meetings of the requirement to accurately fill out the necessary forms for documentation.

Item 4. Both the operator who prepared the permit and the operator who improperly performed the block have been counseled, prior to February 28, 1980, by Shift Supervision concerning the importance of clearly identifying equipment on blocks and questioning their supervision if problems arise.

It was determined that valve tags were not on the valves in question, and that Check-Off-Lists (C.O.L.) had not yet included these because they were newly installed as part of an ongoing modification. New valve tags were installed by February 27, 1980, and appropriate C.O.L.'s (S.3.9.1.A C.O.L. and S.3.9.1.B C.O.L.) revised by March 6, 1980. Sketches of the different stages of completion of the modifications to containment isolation air and nitrogen piping were reviewed with shift personnel by February 27, 1980.

Your cover letter to this combined inspection states in part, "In addition to the need for corrective action regarding these specific items of noncompliance, we are concerned about the implementation of your management control systems that permitted them to occur. Consequently, in your reply, you should describe, in particular, those actions taken or planned to improve the effectiveness of your management control systems."

RESPONSE:

We have reviewed in detail these inspection report findings and have determined that a need for improvement in the administration of plant modification control exists. Two specific areas have been identified as requiring improvement. The improvements required are: 1) improved staffing in the modification coordinator position; 2) improved administrative controls to ensure that the operating staff has sufficient and proper information and approved procedures to operate systems and equipment which have undergone modifications.

The first area will be resolved by dedicating an experienced, qualified individual to the modification coordinator position. Improved administrative controls will be established through the revision of Administrative Procedure A-14 "Plant Modifications". The revision will establish the mechanisms to ensure that a modification is successfully tested, approve operating and surveillance procedures are provided, operating personnel receive the required training, and controlled information is properly updated. These changes will be completed within 60 days.

Very truly yours,