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May 13, 1980

Re: Docket Nos. 50-277
50-278

Inspection Nos. 50-277/80-06
50-278/80-06

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

Dear Mr. Brunner:

Your letter of April 21, 1980, forwarded combined Inspection Report 50-277/80-06 and 50-278/80-06. Appendix A 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 Specification 6.8.1 requires that written procedures and administrative policies shall be established, implemented and maintained that meet the requirements of Regulatory Guide 1.33, Appendix "A".

Station Procedure A-43, "Surveillance Testing System", and A-47, "Procedure Generation of Surveillance Tests," requires the use of procedures for the performance and documentation of surveillance tests.

Station Procedure A-43 requires that if any test proves unsatisfactory, a Maintenance Request Form (MRF) be initiated to ensure proper corrective action.

Technical Specification 4.9.A.2.c, Unit Batteries, states the following: "Once each operating cycle, the stated batteries

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shall be subjected to a rated load discharge test. The specific gravity and voltage of each cell shall be determined after the discharge and logged."

Contrary to the above, two surveillance tests were not conducted and documented in accordance with existing station surveillance procedures; corrective maintenance was performed without documentation per a MRF; and final battery cell voltages and specific gravities were not recorded in that:

In conjunction with inspection and maintenance of the Unit 2 125 volt batteries during the 1978 refueling outage, discharge capacity tests were performed on these batteries but there was no documentation indicating that the discharge tests were performed in accordance with station procedure ST 8.4, 125/250 Battery Discharge Test. Attached to the MRFs and maintenance procedures were data sheets indicating the capacity tests were satisfactory; however, there was no documentation (e.g., calculations and data) supporting the final results.

For the above discharge tests, battery cell voltages and specific gravities subsequent to the discharge test were not logged as required by Technical Specification 4.9.A.2.c.

The Cable Spreading Room vent dampers were tested on August 21, 1979, per ST 16.4, Cable Spreading Room Cardox Simulated Activation and Air Flow Test, and records indicate that three of eight dampers did not operate satisfactorily. A shift supervisor's log entry on September 8, 1979 documents the vent dampers were satisfactorily repaired and retested. However, retest of the vent dampers was not performed nor documented per ST 16.4 and corrective maintenance was not documented nor controlled by use of a MRF.

Response

Corrective action is addressed in two sections, since the infraction involves two separate surveillance tests. The first section (A), describes corrective action taken concerning ST 8.4, the second (B), concerning ST 16.4.

- A. Although the completed surveillance test ST 8.4 could not be located, battery test data sheets used by Maintenance Division personnel were obtained and used to complete portions of ST 8.4 for record purposes. This was completed on April 30, 1980. This data included calculations made to prove satisfactory battery capacity, and battery cell voltages obtained subsequent to the discharge test. Specific

gravity data, required by Technical Specification 4.9.A.2.c to be logged subsequent to this discharge test could not be obtained; however, Peach Bottom Surveillance Test ST 8.3, "Station Battery Quarterly Check", Revision 4, directs that specific gravity and voltage measurements be made on each cell, as required by Technical Specification 4.9.A.2.b. The specific gravity and voltage data from ST 8.3 tests performed subsequent to the 1978 refueling outage were reviewed to verify that values were satisfactory.

Additionally, ST 8.4 is being performed during the current Unit 2 refueling outage. Specific gravity readings subsequent to the discharge test on batteries A and C are satisfactory. The remaining two battery tests will be completed prior to the end of the outage, and will be reviewed to verify the condition of each cell.

- B. Repairs of the three Cable Spreading Room dampers were performed by one of the engineers who performed ST 16.4 on August 21, 1979. Subsequent to the repairs he verified proper operation of the three repaired dampers, without proper use of a Maintenance Request Form (MRF) and without documenting this test. When management became aware of this deficiency, ST 16.4 was scheduled, and performed satisfactorily on May 2, 1980.

On May 6, 1980, the personnel who perform these tests were reminded of the importance of properly documenting all work and testing. Full compliance will be achieved subsequent to completion of ST 8.4, prior to the end of the current refueling outage.

Very truly yours,

JW Ballou