

APPENDIX A

NOTICE OF VIOLATION

Philadelphia Electric Company

Docket Nos. 50-277  
50-278

Based on the results of an NRC inspection conducted on March 17-21, 1980, it appears that one of your activities was not conducted in full compliance with conditions of your NRC license. This item is an infraction.

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 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 an 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 an MRF.