

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

JOSEPH W. GALLAGHER  
MANAGER  
ELECTRIC PRODUCTION DEPARTMENT

(215) 841-5003

May 12, 1980

Re: Docket Nos. 50-277  
50-278

Inspection Nos. 50-277/79-30  
50-278/79-33

Mr. Boyce H. Grier, Director  
Office of Inspection and Enforcement  
Region I  
United States Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, PA 19406

Dear Mr. Grier:

This letter is in response to combined Inspection Report 50-277/79-30 and 50-278/79-33 dated April 21, 1980. Appendix A to your letter addresses two items which do not appear to be in full compliance with Nuclear Regulatory Commission requirements. Item A, categorized as an infraction, and Item B, categorized as a deficiency, are restated in the attached Appendix A with our responses.

Appendix B to your letter contains an infraction which does not appear to be in full compliance with Nuclear Regulatory Commission requirements and pertains to the details of the physical security plans of a licensed facility. Therefore, it is hereby requested that the information included in the attached Appendix B be withheld from public disclosure pursuant to Section 2.790 of the Commission's Regulations. An affidavit in support of this request is attached hereto. The infraction is restated in the attached Appendix B with our response.

Very truly yours,

*JW Gallagher*

8007230722

COMMONWEALTH OF PENNSYLVANIA :

ss.

COUNTY OF PHILADELPHIA :

J. W. GALLAGHER, being first duly sworn, deposes and states as follows:

1. He is Manager of the Electric Production Department of Philadelphia Electric Company (hereinafter referred to as the "Company"); he is authorized to execute this Affidavit on behalf of the Company; and he has read Appendix B to the letter to the United States Nuclear Regulatory Commission, Office of Inspection and Enforcement, containing the Company's response to Inspection Report Number 50-277/79-30 and 50-278/79-33 (hereinafter referred to as "the Response"), and knows the contents thereof.

2. The Response which is sought to be withheld from public disclosure contains details of the physical security plans for Peach Bottom Atomic Power Station.

3. To the best of his knowledge, information and belief, the information set forth in the Response has been treated as confidential and proprietary information and has been withheld from public disclosure by the Company in accordance with the Company's practice of treating all information dealing with the details of security procedures as confidential and proprietary information.

4. The Response should be considered by the Nuclear Regulatory Commission as confidential and proprietary information and be withheld from public disclosure on the grounds that it contains details of the physical security plans of a licensed facility, such disclosure is not required in the public interest, and such disclosure would adversely affect the interest of Philadelphia Electric Company.

JW Gallagher

Subscribed and Sworn to  
before me this 12<sup>th</sup> day  
of May, 1980

Elizabeth H. Boyer

Notary Public  
ELIZABETH H. BOYER  
Notary Public, Phila., Phila. Co.  
My Commission Expires Jan. 30, 1982

PHILADELPHIA ELECTRIC COMPANY  
RESPONSE TO INSPECTION REPORT NUMBERS  
50-277/79-30 & 50-278/79-33

APPENDIX A

- A. Technical Specification 6.11, "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 14, dated September 24, 1979, Section III states in part... "The responsibility for following the requirements of the RWP will be accepted by each individual when he signs in on the RWP".... RWP 2-94-0628A dated November 10, 1979, issued for decontaminating and painting planking in the Unit 2 RBCCW Room states that taped openings are required under anti-contamination requirements.

Contrary to the above requirements, on December 11, 1979, one individual who had signed in on RWP 2-94-0628A was observed working in the painting area, a contaminated area, with untaped open coveralls. (Recurrent item).

Response

The individual who had not fully complied with the requirements of the Radiation Work Permit (RWP) was identified to a Health Physics Technician, who immediately directed the taping of the individual's coveralls, and reinstructed the man to ensure his future complete compliance with RWP requirements.

PECo management recognizes the need for and importance of compliance by all site personnel with radiation protection requirements. Therefore, several station staff members have recently conducted formal lectures with site personnel to re-emphasize this need.

- B. Technical Specification 6.8.1 requires in part: "Written procedures and administrative policies shall be established,

implemented, and maintained...". Procedure ST 7.2.3.C, "Analysis of the Time Reactor Water Chloride and Conductivity are Above Limits", revision 1, dated May 9, 1979, step D.1 stated in part: "Enter `running totals` from the previous week on first line of data sheet".

Contrary to the above, during performance of the referenced surveillance tests on Units 2 and 3 on October 9, 1979 (week 79-4-1), all zeros, rather than the actual running totals were recorded on the first line of the data sheet for each unit.

### Response

Health Physics and Chemistry Supervision explained proper completion of the surveillance test data sheet to the responsible technician as soon as the error was identified. Although zeros were mistakenly entered on the first line of the data sheets in the procedure referenced in Item B, it was verified that correct conductivity and chloride running totals, both for the week and the year, had been entered on the data sheets, and that no error in yearly totals would result from these improper entries.

Although the procedure specified that the conductivity and chloride running totals for the year from the previous week should be entered on the first line of the data sheet, the heading on the data sheet itself for this line was worded awkwardly. The procedure was revised February 7, 1980, to more precisely define and clarify the data sheet entries.