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VICE PRESIDENT
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April 16, 1981

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

Dear Mr. Grier:

Your letter of April 7, 1981, referred to the April 3, 1981, telephone conversation between E. C. McCabe, NRC, and M. J. Cooney, Philadelphia Electric Company, concerning radioactive releases from Peach Bottom Atomic Power Station. This conversation was precipitated by an improper "feed and bleed" of the Unit 2 Drywell Chilled Water System which resulted in an unplanned and unmonitored release of radioactive liquid to the environment. Following are the commitments specified in your letter to prevent recurrence and our schedule for accomplishing these items.

Action To Be Taken:

1. Performing documented review of all presently contaminated, normally non-radioactive systems to assure that permissible activities will not result in unplanned or unmonitored radioactive releases to the plant or environs.

Response

A documented review of the Unit 2 Reactor Building Closed Cooling Water System and Drywell Chilled Water System has been completed. These systems are normally non-radioactive and are presently contaminated. In addition a similar review has been conducted on the Unit 2 Turbine Building Cooling Water System. The review was documented by marking up P&IDs and listings of valve and piping configurations in each system which required additional considerations. As a result of this review, measures have been

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taken to avoid further unplanned or unmonitored radioactive releases from these systems. These measures include additional control of activities via blocking tags, cutting and capping certain drain lines, and identification of some potentially contaminated areas with ropes and signs. The items identified for further consideration will be provided to Engineering for evaluation and corrective action as described in paragraph 3 of your letter. Some additional temporary modifications and measures are being considered to further ensure containment of the contaminated liquids.

A similar review and analysis will be performed on Unit 3 before startup from the present refueling outage.

2. Conducting activities which could result in a radioactive release to the environs only in accordance with procedures reviewed by the Plant Operations Review Committee and approved by the Station Superintendent or designated alternate. These procedures will provide careful safeguards against unplanned or unmonitored releases to the plant or environs and will include provisions, where feasible, for locking components whose operation could result in a radioactive release to the environs. For normally uncontaminated systems which become contaminated, the procedures will provide for evaluating the feasibility of eliminating the contamination sources before removing contaminants from the system. Contamination Control procedures will be applied to activities involving both contaminated and potentially contaminated systems.

Response

As a result of the reviews conducted, procedures for feed and bleed of the contaminated liquid in the Reactor Building Closed Cooling Water and Drywell Chilled Water Systems have been developed, reviewed, approved, and implemented. These procedures include prerequisites and specific instructions which provide safeguards against unplanned or unmonitored releases. It is believed that the source of contamination has been eliminated for the present problem. This will be verified as a result of the feed and bleed procedure. The individual procedures presently approved do not require elimination of the contamination source before establishing a feed and bleed on the systems. Site personnel have been made aware of the necessity to identify the source of contamination at the earliest opportunity after radioactive contamination of any normally nonradioactive system is identified. Site staff personnel have also been made aware that specific detailed procedures must be written and approved prior to implementing feed and bleed operations on systems which become contaminated in the future or when performing operations

which are recognized as having a potential for release of contaminated liquids to the plant or the environs.

As indicated above, temporary measures have been taken to identify the systems which are normally non-radioactive and are presently contaminated. These measures include posting of potentially contaminated signs or safety blocking. It is our intention to mark the piping systems and components which could potentially be contaminated such that individuals maintaining and operating these systems would be aware of a potential contamination problem. These component and piping system markings are expected to be completed by July 1, 1981, on Unit 2 and before startup from the present refueling outage on Unit 3. A procedure which addresses contamination control will be written and applied to activities involving work and operation of the potentially contaminated systems. This procedure will be implemented by August 1, 1981.

3. Performing a documented review of potential liquid release paths to the environment, including drain systems, with recommendations for improvement of the safeguards against unplanned or unmonitored releases to the plant or environs to be provided and acted upon, and with a schedule for appropriate corrective actions to be developed, promulgated, and aggressively pursued.

Response

A documented review of potential liquid release paths to the environment will be completed by October 1, 1981. Potential modifications will be evaluated and a schedule for appropriate corrective actions developed by December 1, 1981.

In addition, in response to IE Bulletin 80-10, "Contamination of Nonradioactive System and Resulting Potential For Unmonitored, Uncontrolled Release to Environment", a review was made of non-radioactive systems which could possibly become contaminated through interfaces with radioactive systems. A routine sampling and analysis program was initiated to promptly identify any contaminating events which could lead to unmonitored or uncontrolled releases to the environment. Appropriate sample taps are being added as part of this program. Detailed information on this program was submitted in a letter from S. L. Daltroff, Philadelphia Electric Company, to P. H. Grier, NRC, on July 2, 1980. Since our submittal, we have been proceeding to complete the design of the required modifications. In addition, we have evaluated the causes of Turbine Building Cooling Water and Drywell Chilled Water contamination and are completing the

design of modifications to eliminate these problems during normal operation.

4. Development, approval, and implementation of procedures for operation, surveillance, and testing of liquid process radioactivity monitors, including the Reactor Building Cooling Water System radioactivity monitors, to include calibration, expected readings, routine checks, resolving discrepant indications, and additional sampling when the monitors are inoperable.

Response

Procedures for operation, routine calibration, and monitoring of Reactor Building Closed Cooling Water, Service Water, Radwaste Discharge and Emergency Service Water System radioactivity monitors are being developed. These procedures will include provisions for placing the monitors in service and removing the monitors from service, routine calibrations and response checks, and routine sampling of system inventory when monitors are inoperable. Procedure changes will be made to require periodic comparisons of the monitor readings to expected values. These procedures and mechanisms will be established by September 1, 1981.

Very truly yours,

A handwritten signature in cursive script, appearing to read "H. Grier", is written in dark ink below the typed text.