



1881 - 1981

## PHILADELPHIA ELECTRIC COMPANY

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SHIELDS L. DALTROFF  
VICE PRESIDENT  
ELECTRIC PRODUCTION

July 16, 1981

Re: Docket Nos. 50-277  
50-278

Insp. Nos. 50-277/81-02  
50-278/81-02

Mr. Gary L. Snyder, Chief  
Emergency Preparedness and Program  
Support Branch  
Division of Emergency Preparedness and  
Operational Support  
Region I  
U.S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, PA 19406

Dear Mr. Snyder:

Your letter of June 22, 1981, forwarded combined Inspection Report 50-277/81-02 and 50-278/81-02. Appendix A addresses two items which do not appear to be in full compliance with Nuclear Regulatory Commission requirements. These items are categorized as Severity Level VI violations in accordance with your interim enforcement policy, 45 FR 66754 (October 7, 1980), and are restated below with our responses.

- A. Section 3.2.1 of the PBAPS Environmental Technical Specifications specifies, in part, that the chlorine analyzer shall be calibrated monthly.

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1. Contrary to the above, during the October 1980 calibration of the analyzer, the chlorine analyzer was found out of calibration according to the acceptance criteria of Procedure ST 7.3.2b and no action was taken for subsequent adjustment of the analyzer, such that that analyzer was not effectively calibrated for that month.
2. Contrary to the above, from July through October, 1979, and June and September, 1980, the grab samples used to calibrate the analyzer had "less than 0.1" or 0 mg/l of chlorine, levels too low to elicit a quantifiable response from the analyzer. This, therefore, did not constitute calibration of the system.

This is a Severity Level VI Violation (Supplement I).

Response

- A.1 Due to the continued difficulty of obtaining satisfactory chlorine analyzer readings which satisfactorily compare to grab sample results, despite calibration of the analyzer according to manufacturer's recommendations, the chlorine analyzer has been taken out of service. A new chlorine analyzer has been installed along the discharge canal, which samples water at the point of discharge to the Conowingo Pond. The analyzer is currently operated on a test basis, and is expected to be in full operation by January 1, 1982. Daily Surveillance Test ST 7.3.2.a, 'Analysis of Circulating Water for Free Residual Chlorine' was revised and approved on June 4, 1981, to now require that grab samples be taken at the beginning, midpoint, and end of chlorination in lieu of use of the chlorine analyzer.

Procedure ST 7.3.2.b will be revised to remove any reference to the currently installed in-plant chlorine analyzer.

A request for change to Environmental Technical Specification Section 3.2.1 monitoring requirements will be submitted to reflect the current method of chlorination monitoring.

Additionally, all Chemistry Technicians were counseled to pay closer attention to the limitations and requirements of all procedures, and of the importance of notification of supervisory personnel if any requirement of a test cannot be satisfied.

- A.2 Changes made in the recent revision to ST 7.3.2.a remove reference to the automatic chlorine analyzer, because it is no longer used, and, as discussed in response A.1, an Environmental Technical Specification change request will be submitted. When the chlorine analyzer which is currently being tested is placed in operation, standard solutions will be used for calibration. This will ensure a quantifiable response. Full compliance with Environmental Technical Specification requirements has been achieved at this time.
- B. Section 3.2.1 of the PBAPS Environmental Technical Specifications specifies that in the event that the continuous chlorine analyzer is inoperable, manual measurements of the free residual chlorine level in the condenser discharge water shall be made at the start, midpoint, and end of chlorination.

Contrary to this requirement, during the intervals June 1 through 3 and 23 through 30, and July 1 through 8, 1979, grab samples were collected only at the end of the chlorination period and not at the start or midpoint.

This is a Severity Level VI Violation (Supplement I).

#### Response

The cause of these occurrences is inattention to detailed procedural requirements. Chemistry Technicians were counseled as discussed in response A.1. Additionally, operations personnel were reminded to pay closer scrutiny to all test results which require their approval.

As discussed in response A.1, Procedure ST 7.3.2.a now requires that a grab sample be taken at the start, midpoint, and endpoint of chlorination, and analyzed for determination of free chlorine residual levels. Additionally, the procedure now requires verification of grab sample pump operability prior to chlorination, providing further assurance of sampling capability. Full compliance has been achieved at this time.

If you have any questions or require additional information, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in cursive script, appearing to read "J. J. Salty". The signature is written in dark ink and is positioned below the typed text "Very truly yours,".