

APPENDIX A
NOTICE OF VIOLATION

Philadelphia Electric Company
Fech Bottom Atomic Power Station Units 2 and 3
Delta, PA

Docket Nos. 50-277 and 50-278
License Nos. DPR-44 and DPR-56

During an NRC inspection conducted on June 15, through August 2, 1993, three violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1992), these violations are listed below:

- A. Technical Specification 6.8.1 states that written procedures shall be established, implemented and maintained that meet the requirements of Sections 5.1 and 5.3 of ANSI N18.7-1972. ANSI 18.7-1972, Section 5.1, states, in part, that "operators shall adhere to procedures," and ANSI Section 5.3, states, in part, that "Nuclear Power Plants shall be operated in accordance with written procedures."

Contrary to the above, the licensee did not properly implement procedures while withdrawing a control rod. Specifically: On June 24, a power increase was commenced by withdrawing control rod 14-31 to its fully withdrawn position without adhering to GP-5, Section 5.0, "Power Operations," which requires power increases to be performed under the guidance of procedure RE-31, "Reactor Engineer Start-Up/Load Drop Instructions." RE-31 specified the position for control rod 14-31 to be notch 34 vice fully withdrawn. Operator error resulted in control rod 14-31 being mispositioned for approximately 2 hours.

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

- B. Technical Specification 6.8.1 states that written procedures shall be established, implemented and maintained that meet the requirements of Sections 5.1 and 5.3 of ANSI N18.7-1972. ANSI 18.7-1972, Section 5.1, states, in part, that "operators shall adhere to procedures," and also that "if documentation of an action is required, the procedure should be present and followed step-by-step, and necessary data should be recorded as the task is performed." ANSI Section 5.3, states, in part, that "Nuclear Power Plants shall be operated in accordance with written procedures."

Contrary to the above, the licensee did not properly establish or implement applicable procedures during a maintenance evolution. Specifically: On July 9, during performance of Instrumentation and Control Work Order R0526192-01, a procedure was not present at the job site or in the control room. Additionally, the controlling procedure (IC-11-00574, "Calibration Procedure for G.E. HCU Accumulator Level Switches"), the work order, and the calibration data sheet all specified different torque values for the N₂ charging connection cap. Finally, neither the work order nor the data sheet required the torque value to be recorded.

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

- C. Technical Specification 6.8.1 states that written procedures shall be established, implemented and maintained that meet the requirements of Sections 5.1 and 5.3 of ANSI N18.7-1972. ANSI 18.7-1972, Section 5.1, states, in part, that "operators shall adhere to procedures," and ANSI Section 5.3, states, in part, that "Nuclear Power Plants shall be operated in accordance with written procedures."

Contrary to the above, the licensee did not properly implement their health physics (HP) procedures on several separate occasions during the Unit 3 outage (July 4 - 14). Specifically: (1) Two individuals were observed inside a contaminated area with their protective clothing open in the chest/neck area. This is contrary to HP-C-510, "Selection, Use and Control of Protective Clothing," Section 7.2.1. (2) Personnel exiting the RWP area on the refuel floor and the drywell were observed removing their inner set of plastic gloves prior to removing their shoe covers. This is not consistent with HP-215, Exhibit 2, steps 9 and 10. (3) A contaminated boundary on the refueling floor was not marked in accordance with procedure HP-215, "Establishing and Posting Controlled Areas," in that the marking tape was placed approximately 12 inches inside the boundary rope. (4) Lastly, a HP technician failed to sign out of the accountability log after exiting the Unit 3 spent fuel pool and reactor cavity RWP area as required by procedure A-C-130, Section 7.8.1.

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

Pursuant to the provisions of 10 CFR 2.201, Philadelphia Electric Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region I, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of receipt of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.