

50-277-810808
50-277-810827

APPENDIX A

NOTICE OF VIOLATION

Philadelphia Electric Company
Peach Bottom Unit 2

Docket No. 50-277
License No. DPR-44

As a result of the inspection conducted on August 4 - September 3, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

- A. Technical Specification 3.7.D and Table 3.7.1 require that primary containment isolation valves, including High Pressure Coolant Injection (HPCI) steam line exhaust drain valves, be operable during power operation, or that at least one valve in each line with an inoperable isolation valve be in the isolation position, or that an orderly shutdown be initiated.

Contrary to the above, from about 11:30 a.m., August 8, 1981 until about 7:20 a.m., August 9, 1981, HPCI Turbine Exhaust Drain Line Isolation Valve A0-4248, which had been found failed shut on August 8, 1981, was manually blocked open during power operation rendering its primary containment isolation function inoperable: no valve in that drain line was placed in the isolated (shut) position and an orderly shutdown was not initiated.

This is a Severity Level III Violation (Supplement I) applicable to DPR-44.

- B. Criterion V, Appendix B, 10 CFR 50, requires activities affecting quality to be prescribed by and accomplished in accordance with documented instructions, procedures, or drawings, of a type appropriate to the circumstances. The licensee's approved QA Plan, Revision 4, January 1980, Section 2, requires that personnel participating in an activity be aware of and use proper and current drawings. Peach Bottom Procedure A-6, Revision 7, April 19, 1981, requires that controlled drawings be updated to show significant changes and requires that operating personnel use controlled copies. Drawing M-372, Containment Atmosphere Dilution System, is included in the scope of Procedure A-6.

Contrary to the above, by August 18, 1981, the control room copy of drawing M-372 had not been updated to include the Unit 2 radioactive gas sampler containment isolation valve installed in October, 1980. Further, a later revision to M-372, distributed on August 21, 1981, did not legibly show the radioactive gas sampler containment isolation valve on controlled copies in the control room and shift supervision office.

This is a Severity Level V Violation (Supplement I) applicable to DPR-44.

- C. Technical Specification 3.1 and Table 3.1.1 require, in the Startup and Run modes, that at least two APRM high flux instrument channels be operable in each reactor protection trip system, or that the affected trip system be tripped, or that all operable control rods be inserted within four hours. Table 3.1.1, Note 11 states that an APRM is operable if there are at least two LPRM inputs per level.

Contrary to the above, from about 5:30 a.m. on April 24, 1981 until about 12:05 a.m. on April 27, 1981, with the reactor in the 'Startup' and 'Run' modes, Reactor Protection System Logic Trip System 'A' was at times receiving input from only one operable APRM, Logic Trip System 'A' was not tripped, and all operable control rods were not inserted.

This is a Severity Level III Violation (Supplement I) applicable to DPR-44.

- D. Technical Specification 4.6.A and Peach Bottom Surveillance Test ST 9.12, Revision 3, April 6, 1977, require, during heatups and cooldowns, logging of bottom head drain and recirculation loop "A" and "B" temperatures at least every 15 minutes until the difference between any two readings taken over 45 minutes is less than 5 degrees Fahrenheit.

Contrary to the above, during cooldown on August 18, 1981, logging of temperatures was stopped at 5:00 a.m. although the temperatures had changed by 42 to 47 degrees during the previous 45 minutes.

This is a Severity Level VI Violation (Supplement I) applicable to DPR-44.

Pursuant to 10 CFR 2.201, Philadelphia Electric Company is hereby required to submit to this office, within thirty days of the date of this Notice, a written reply stating: the corrective steps which have been taken and results achieved; corrective steps which will be taken to avoid further violations; and the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation. Where good cause is shown, consideration will be given to extending your response time.

The responses directed by this Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Date NOV 5 1981

Original Signed By:

Ronald C. Haynes
Director