PHILADELPHIA ELECTRIC COMPANY

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(215) 841-5003

March 2, 1982

Docket Nos. 50-277 50-278

Richard W. Starostecki, Director Division of Resident and Project Inspection Region I U. S. Nuclear Regulatory Commission 631 Park Avenue Fing of Prussia, PA 19406

Dear Mr. Starostecki:

Your letter of February 2, 1982, forwarded combined Inspection Report Nos. 50-277/81-27 and 50-278/81-30. Appendix A addresses one item which does not appear to be in full compliance with Nuclear Regulatory Commission requirements. This item is categorized as a Severity Level III violation and is restated below with our response.

Technical Specification 3.2.A and Table 3.2.A require, when primary containment integrity is required, that at least two Main Steam Line Leak Detection High Temperature instrument channels be operable in each Primary Containment Isolation trip system, with trip level settings less than or equal to 200 degrees Fahrenheit.

Contrary to the above, from about 8:00 PM until about 8:20 PM on December 5, 1981, with primary containment integrity required, the Main Steam Line Leak Detection High Temperature trip setpoints were set at 250 degrees Fahrenheit on both channels in both trip systems.

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

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Response

As reported in LER 2-81-46/1P and 1T, Unit 2 was operating at approximately 95 percent power, when an undetected loss of normal reactor building ventilation occurred. About two hours later, the main steam line tunnel exhaust duct high temperature annunciator alarmed and Group I Isolation Channel A tripped. Temperature indicators for these detectors showed approximately 195 degrees Fahrenheit. These high temperatures were a result of the loss of normal ventilation. Based on previous occurrences of this type, it is known that upon restoration of ventilation flow, hot stagnant air will be carried past the temperature detectors which could cause a Group I Isolation. To prevent the significant reactor pressure transient which accompanies a Group I Isolation, the setpoints of the Main Steam Line temperature switches were increased from their Technical Specification value of less than 200 degrees Fahrenheit to 250 degrees Fahrenheit for a twenty minute period, while reactor building ventilation was returned to normal service. Before the instrument setpoints were increased, it was known that a Main Steam Line break did not exist. While the setpoints were above normal, the temperatures were constantly monitored to detect any unusual temperature increases.

After ventilation was restored and the Main Steam Line area temperatures returned to normal, the setpoints were reset to 195 degrees Fahrenheit and were recalibrated within 24 hours. Recalibration demonstrated that all setpoints were within Technical Specification limits.

The loss of normal reactor building ventilation occurred during a switchover of the equipment cell ventilation to the standby gas treatment system. This transfer is routinely done in preparation for regeneration of Reactor Water Cleanup demineralizers; however, in this instance, operator error during the transition resulted in loss of the normal Reactor Building ventilation.

The actions that were taken in raising the setpoints were the same as those taken in January 1981 as authorized by an Emergency Technical Specification change. The Shift Superintendent on duty knew of that occurrence and that a permanent revision to the Technical Specifications had been submitted. He believed that the Technical Specifications had been revised to allow the setpoint increase. Following the event he consulted the Technical Specifications but could not find authority for this action. Conversations with a staff engineer, the Assistant Superintendent and a corporate licensing engineer determined that the revision was still pending. Discussions were held with the licensed operators involved about the inappropriateness of these

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actions, Discussions with all licensed operators have been held with emphasis being placed upon the importance of referencing, and completely reviewing and complying with Technical Specification requirements. Additionally, this Technical Specification amendment has since been approved which will eliminate future occurrences of this type.

Your letter of February 2, 1982, also requested that Philadelphia Electric Company address the eight Limiting Conditions for Operation (LCO) violations cited at Peach Bottom in 1981. Specifically, a request was made to address the steps which have been taken or will be taken to correct the repetitiveness of LCO violations and to assure that operators are aware of the intent of the LCOs and more knowledgeable of their content.

In response to this request, we reviewed each of the eight LCO violations identified in 1981. Four of these LCO violations were associated with valving errors or lack of control to maintain valves in their proper positions. The Philadelphia Electric Company response to this generic issue identified in combined Inspection Report Nos. 50-277/81-24 and 50-278/81-26 addresses our efforts to reduce valving errors.

Two of the LCO violations involved increase of reactor temperature above 212 degrees Fahrenheit during a period when primary containment integrity was not established, and operation with less than the required number of LPRM detectors at a certain level in one APRM channel. A review of these two occurrences indicates that lack of controls in these areas resulted in these violations. The Philadelphia Electric Company response to the specific items provides the corrective action taken and lists the administrative controls which have been established to prevent recurrence. These responses also provide some generic corrective action in related areas.

The two remaining LCO violations involved the manual blocking open of an isolation valve associated with the HPCI steam line exhaust line drain system without initiating a reactor shutdown, and temporarily increasing the main steam line tunnel temperature setpoint from 200 degrees Fahrenheit to 250 degrees Fahrenheit during restart of the reactor building ventilation system. Staff review has determined that these violations could have been avoided with increased operator awareness of the Technical Specifications. In order to increase the awareness of the licensed and senior licensed operators of the need to strictly adhere to Technical Specification requirements, meetings with operations personnel have been held since November, 1981. The

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Station Superintendent and Operations Engineer conduct the meeting with both licensed and nonlicensed operators and discuss a prepared agenda. The need to be knowledgeable of and strictly adhere to Technical Specification requirements has been conveyed during these meetings. The need to keep plant management informed of operations which impact Technical Specification requirements has also been stressed. It is our intent to continue these plant management/operator meetings on a periodic basis to maintain operator awareness in this area. In addition, the requalification program during the 1982 training year will stress those portions of the Technical Specifications which have caused difficulty in the past.

The action taken in response to each of the LCO violations identified during 1981, plus the actions listed above, should assure that operators are aware of the intent of the LCOs and are more knowledgeable of Technical Specification requirements.

If you have any questions or require additional information, please don't hesitate to contact us.

Very truly yours,

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cc: C. J. Cowgill, Site Inspector