

APPENDIX A

NOTICE OF VIOLATION

Philadelphia Electric Company  
Peach Bottom Atomic Power Station  
Unit No. 2

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

The inspection conducted on February 20 through April 2, 1990, identified the following violations, characterized according to the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy):

- A. Technical Specification 6.8.1 requires that written procedures shall be established, implemented, and maintained that meet the requirements of Appendix A of Regulatory Guide 1.33 (November 1972). Regulatory Guide 1.33, Appendix A, requires implementation of radiation work permit (RWP) procedures.

Administrative procedure A-107, "Radiation Work Permit Program," establishes the RWP program, and Step 5.5 requires that individuals comply with the provisions of the RWP.

- A.1 Radiation work permit 2-90-054200 required in special instruction 5 that individuals making entry to the Unit 2 torus room shall wear an alarming dosimeter and have positive health physics coverage.

Contrary to the above, on March 27, 1990, two maintenance workers made two entries into the Unit 2 torus room, a posted high radiation area, without complying with special instruction 5 of the Radiation Work Permit.

- A.2 Radiation Work Permit 2-90-5491 required in the special instructions that individuals breaching or clearing sample lines to the waste surge tanks wear a filter respirator, a surgeon's cap, top zipper and hood openings, and inform the controlling health physics technician of the breach so that he could be present.

Contrary to the above, on March 28, 1990, four workers breached the sample line to the waste surge tank and cleared the line with nitrogen gas without complying with the special instructions on the Radiation Work Permit in that they did not inform health physics prior to breaching the system, and did not comply with the dress requirements.

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

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- B. Technical Specification 6.8.1 requires that written procedures and administrative policies shall be established, implemented, and maintained that meet the requirements of Sections 5.1 and 5.3 of ANSI N18.7-1972 and Appendix A of Regulatory Guide 1.33 (November 1972). Section 5.1.5 of ANSI N18.7-1972 requires procedures for control measures such as locking to secure and identify equipment in a controlled status. Appendix A of Regulatory Guide 1.33, Section A.3, also requires equipment control administrative procedures (e.g., locking).

Administrative procedure A-8, "Control of Locked Valves," Revision 6, Section 7.1.3 requires the requestor to complete a locked valve request, receive shift management approval for each locked valve to be manipulated, inform the control room operator of the planned manipulation and to obtain the applicable locked valve key from the control room key cabinet.

- B.1 Contrary to the above, on February 15, 1990, while performing ST 6.16, "Motor Driven Fire Pump Operability Test," Revision 12, a non-licensed operator manipulated three locked manual valves (HV-0-37C-12443, 12444, and 12345) without obtaining locked valve requests, shift management approval, and a locked valve key in accordance with procedure A-8. As a result the locking device for HV-0-37C-12444 was not re-applied following the test.
- B.2 Contrary to the above, on March 19, 1990, while conducting work under maintenance request form 9001918, a test engineer unlocked and manipulated locked manual valves HV-2-33-21078A and 21078B (reactor core isolation cooling system "A" and "B" room cooler inlet block valves) without obtaining locked valve requests and shift management approval as required by procedure A-8.

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 to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.