



PEACH BOTTOM—THE POWER OF EXCELLENCE

**PHILADELPHIA ELECTRIC COMPANY**

PEACH BOTTOM ATOMIC POWER STATION  
R. D. 1, Box 208  
Delta, Pennsylvania 17314  
(717) 456-7014

D. B. Miller, Jr.  
Vice President

June 4, 1990

Docket Nos. 50-277  
50-278

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

SUBJECT: Peach Bottom Atomic Power Station - Units 2 & 3  
Response to Notice of Violation (Combined Inspection  
Report Nos. 50-277/90-04; 50-278/90-04)

Dear Sir:

This is in response to your letter dated May 4, 1990, which transmitted Peach Bottom Inspection Report Nos. 50-277/90-04; 50-278/90-04. This report concerns the licensed operator requalification program evaluation conducted March 5 thru March 12, 1990. Appendix A of your letter identified items which do not appear to be in compliance with NRC requirements. The attachment to this letter provides a restatement of these items and PECO's response. The corrective actions outlined in the attachment ensure compliance with the requirements of 10 CFR 55.59.

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

Sincerely,

Attachment

- cc: R. A. Burricelli, Public Service Electric & Gas
- T. M. Gerusky, Commonwealth of Pennsylvania
- J. J. Lyash, USNRC Senior Resident Inspector
- T. T. Martin, Administrator, Region I, USNRC
- H. C. Schwemm, Atlantic Electric
- J. M. Teitt, State of Maryland
- J. Urban, Delmarva Power

9006110124 900604  
PDR AD0CK 05000277  
PDC

TEO  
11

Response to Notice of Violation (90-04/04)

Restatement of Violation

10 CFR 50.54(k) states, in part, that a reactor operator or senior reactor operator licensed pursuant to Part 55 shall be present at the controls.

10 CFR 55.53(h) and 10 CFR 55.59(a)(2) state, in part, that as a condition of the license, licensed operators must successfully pass a comprehensive requalification written examination and an annual operating test.

Contrary to the above four reactor operators and three senior reactor operators did not successfully pass a comprehensive written examination administered in the period February 1988 - April 1988 and performed licensed duties at the controls in the intervening period until the seven individuals were retrained and successfully passed a comprehensive written examination by the facility in the period April 1988 - June 1988. In addition, one senior reactor operator did not successfully pass an annual operating test in December 1988 and performed licensed duties at the controls in the intervening period until the individual was retrained and successfully passed an operating test in January 1989.

This is a severity level IV violation.

Corrective Steps Taken and Results Achieved

Procedural controls were strengthened to preclude licensed operators from performing licensed duties if they did not successfully pass requalification examinations. The Licensed Operator Requalification Program Plan, TP-140 was revised March 16, 1990 to prevent the recurrence of any operator from executing licensed duties who had not satisfactorily completed a comprehensive requalification written examination and annual operating test or make-up exam.

Corrective Steps Which Will Be Taken To Avoid Further Violations

The stated revision to Licensed Operator Requalification Program Plan, TP-140 will prevent recurrence of operators performing licensed duties without successful completion of required requalification examinations or make-up exams. The programmatic controls require the Superintendent - Operations to inform any individual who does not successfully pass a facility or USNRC administered requalification examination (comprehensive written or annual operating) that the individual shall not resume licensed duties until he/she has received the appropriate remedial training and has been notified of successful completion of a make-up examination.

Date When Full Compliance Will Be Achieved

Full compliance was achieved on January 6, 1989 upon the successful retesting of the licensed individual who had not successfully completed an operating test.

#### Restatement of Violation

10 CFR 50.54(i-1) states, in part, that the licensee shall have a requalification program that meets the requirements of 55.59(c).

10 CFR 55.59(c) states, in part, that the requalification program for licensed operators must include an annual operating test and a comprehensive written examination within the continuous requalification period not to exceed 24 months in duration.

Contrary to the above in the period November 1987 - March 1990, four licensed operators exceeded 24 months for a comprehensive written examination and fourteen licensed operators exceeded the time period for an annual operating test.

This is a severity level IV violation.

#### Corrective Steps Taken and Results Achieved

The Licensed Operator Requalification Program Plan, TP-140 was revised March 1, 1990 to include annual operating tests and comprehensive biennial written examinations based on the date of each previous examination. A computer tracking system was implemented to monitor the schedule of examinations and when the next examination is due.

#### Corrective Steps Which Will Be Taken To Avoid Further Violations

The stated revision to the Licensed Operator Requalification Program Plan, TP-140 requires operators to perform an annual operating test and comprehensive written examination within the continuous requalification period not to exceed 24 months in duration. The computer tracking system will ensure that annual tests and biennial written examinations are administered during the required testing frequencies.

#### Date When Full Compliance Will Be Achieved

Full compliance was achieved on March 20, 1990 with the successful completion of the deficient operating examinations and the institution of strengthened controls to require proper periodicity of testing.