DEC 13 1993

Docket Nos. 50-277
50-278

Mr. D. M. Smith
Senior Vice President-Nuclear
Philadelphia Electric Company
Nuclear Group Headquarters
Correspondence Control Desk
P. O. Box 195
Wayne, Pennsylvania 19087-0195

Dear Mr. Smith:

SUBJECT: Reply to NRC Combined Inspection Nos. 50-277/93-19; 50-278/93-19

This letter refers to your November 3, 1993 correspondence, in response to our October 4, 1993 letter.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of the Peach Bottom Atomic Power Station radiological controls program.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:
James H. Joyner

James H. Joyner, Chief
Facilities Radiological Safety and
Safeguards Branch
Division of Radiation Safety and
Safeguards

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cc:
J. Doering, Chairman, Nuclear Review Board
G. Rainey, Vice President, Peach Bottom Atomic Power Station
G. Cranston, General Manager, Nuclear Engineering Division
C. Schaefer, External Operations - Nuclear, Delmarva Power & Light Co.
G. Edwards, Plant Manager, Peach Bottom Atomic Power Station
A. J. Wasong, Manager, Experience Assessment
G. A. Hunger, Jr., Manager, Licensing Section
J. W. Durham, Sr., Senior Vice President and General Counsel
J. A. Isabella, Director, Generation Projects Department,
Atlantic Electric
B. W. Gorman, Manager, External Affairs
R. McLean, Power Plant Siting, Nuclear Evaluations
D. Poulsen, Secretary of Harford County Council
R. Ochs, Maryland Safe Energy Coalition
J. H. Walter, Chief Engineer, Public Service Commission of Maryland
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
K. Abraham, PAO (2)
NRC Resident Inspector
Commonwealth of Pennsylvania
TMI - Alert (TMIA)

bcc:
Region I Docket Room (with concurrences)

bcc: (Via E-Mail)
W. Dean, OEDO
Joseph Shea, NRR
L. Nicholson, Acting PDI-2, NRR

CONCURRENCES:

LLE	RLB for	
Eckert	Bores	Joyner
12/7/93	12/9/93	12/10/93

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

PEACH BOTTOM—THE POWER OF EXCELLENCE

D. B. Miller, Jr.
Vice President

November 3, 1993

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

Subject: Peach Bottom Atomic Power Station Units 2 & 3
Response to Combined Inspection Report 93-19/19
Concerning Radiological Controls

Dear Sir:

In the cover letter for the subject Inspection Report, you requested a response concerning our actions to address weaknesses noted in the Radiological Occurrence Reporting (ROR) process. Please find attached, the response to that request.

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

Sincerely,

DBM/RKS:bah

Attachment

cc: R. A. Burricelli, Public Service Electric & Gas
W. P. Dornsife, Commonwealth of Pennsylvania
W. L. Schmidt, Senior Resident Inspector, US NRC
T. T. Martin, Administrator, Region I, US NRC
R. I. McLean, State of Maryland
H. C. Schwemm, Atlantic Electric
C. D. Schaefer, DelMarVa Power

Response to Inspection Report 93-19/19

The Radiological Occurrence Report (ROR) process was a system under which radiological discrepancies were evaluated for cause and corrective action. More significant radiological discrepancies were evaluated through the In-House Event Investigation (RE/EIF) process. Although a more comprehensive evaluation was performed under the In-House Event Investigation process, corrective actions from both processes were effective in resolving most of the events identified. There were a few examples in the ROR process, however, where corrective actions could have been more comprehensive. This process shortcoming has been addressed by the incorporation of RORs into the Performance Enhancement Program (PEP). PEP was designed to contain all of the essential elements of an effective corrective action program. It consolidated a number of plant corrective action processes including the In-House Event Investigation process. PEP was implemented September 7, 1993.

PEP is a unified mainframe computer based program that provides a mechanism to ensure that plant events and issues are thoroughly evaluated and that appropriate corrective actions to prevent recurrence and address generic implications are developed and successfully completed. Any issue determined to have a potential adverse radiological impact is reviewed by the Health Physics staff upon initiation. Additionally, corrective action plans developed to prevent recurrence and to address generic implications are also reviewed and accepted by the Health Physics staff. Through the PEP process, the evaluation of radiological discrepancies and the development of comprehensive corrective actions will be more effective.

To enhance worker performance in the field and prevent radiological discrepancies, Health Physics technicians were instructed on their role as coaches to ensure work groups meet established standards. Additionally, middle management will also be held more accountable for improving station performance through increased monitoring and coaching of workers. An increased emphasis has also been placed on publishing articles in the site daily newsletter on proper radworker practices to heighten worker awareness. A video that will feature line supervisors communicating management expectations for adherence to established standards in contamination control and proper radworker practices is under development. This video will show examples of identified improper radworker practices and the correct practice for each situation. This video will be completed by January 31, 1994.