

APPENDIX A

NOTICE OF VIOLATION

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

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

The inspection conducted from July 3 through August 13, 1990, identified the following violation, 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 (TS) 6.8.1 requires establishing and implementing written procedures that meet the requirements of Sections 5.1 and 5.3 of ANSI N18.7-1972, and Appendix A of Regulatory Guide (RG) 1.33 (November 1972). Contrary to the above, on three occasions during the inspection period operations personnel did not adhere to established procedures for equipment monitoring and operation. Specifically:

- A.1 Appendix A of Regulatory Guide 1.33, Section G.4.A, requires procedures for mechanical vacuum pump operation. Abnormal operating procedure AO 8.2-3, "Off-Gas System Operation During Controlled Shutdown if High Off-Gas Activity Exists," Revision 0, provides the sequence of actions needed to place the mechanical vacuum pump in service.

Contrary to the above, on July 27, 1990, licensed operators deviated from the sequence contained in the procedure, by opening the vacuum breaker prior to starting the mechanical vacuum pump, which led to a small release of radioactive gas into the turbine building and later to the environment through the reactor building ventilation stacks.

- A.2 Section 5.3.3 of ANSI N18.7-1972 requires procedures for shutting down and changing modes of operation for systems related to the safety of the plant. System operating procedure SO 40D.7.A, "Restoration of Control Room Ventilation Following a High Radiation Trip," Revision 1, requires placing the control switches for the six normal supply fans to 'off' before resetting a trip of the control room ventilation supply radiation monitors.

Contrary to the above, on July 30, 1990, a licensed operator reset the 'B' control room radiation monitor before placing the fan control switches to the 'off' position. This action caused safety-related equipment to return to its normal mode following reset of an engineered safety feature actuation signal.

A.3 Section 5.3.4.2 of ANSI 18.7-1972 requires procedures for monitoring cooldown rates. TS 4.6.A.1 requires logging both recirculation loop temperatures during cooldown. Surveillance test procedure ST 9.12, "Reactor Vessel Temperatures," Revision 15, requires logging recirculation loop temperatures every 15 minutes during cooldown until temperatures stabilize.

Contrary to the above, on July 27, 1990, licensed operators did not log the 3 'B' recirculation loop temperature during a plant cooldown for about 3 hours. This is the second recent occurrence of failure to implement procedure ST 9.12 properly.

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

Following the provisions of 10 CFR 2.201, Philadelphia Electric Company is required to submit to this office within thirty days of the date of receipt of the letter that transmitted this Notice, a written statement in reply including: (1) the corrective steps taken and the results achieved; (2) corrective steps that will be taken to avoid further violations, and (3) the date when full compliance will be achieved. We will consider extending this response time if good cause is shown.