

PHILADELPHIA ELECTRIC COMPANY

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December 22, 1982

Mr. R. C. Haynes, Administrator
Region I
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

SUBJECT: Licensee Event Report Narrative Description

Dear Mr. Haynes:

The following occurrence was reported to Mr. E. C. McCabe, Region I, United States Nuclear Regulatory Commission on December 10, 1982.

Reference: Docket No. 50-277
Report No.: 2-82-41/1T-0
Event Date: December 10, 1982
Report Date: December 22, 1982
Facility: Peach Bottom Atomic Power Station
RD 1 Box 208
Delta, PA 17314

Technical Specification Reference:

Technical Specification 3.2.A requires "When primary containment integrity is required, the limiting conditions of operation for the instrumentation that initiates primary containment isolation are given in Table 3.2.A". Table 3.2.A includes Reactor Water Clean-Up high-temperature \leq 200 degrees F as one of the parameters.

Description of the Event:

The Reactor Water Clean-Up (RWCU) system isolated on high-temperature while the system was operating in the dump mode.

Because RWCU was being utilized to maintain reactor level, the isolation initiation signal was bypassed to de-isolate the system after confirming that the temperature was less than 200 degrees F.

Upon establishing other means of controlling the reactor water level, the RWCU system was once again isolated.

Probable Consequences of the Event:

Technical Specification 3.2.A is directed toward Primary Containment Isolation, a function which is not truly served by the high-temperature isolation of the Reactor Water Clean-Up system. The purpose of this isolation, as discussed in the updated FSAR on page 4.9-2, is "to protect the ion exchange resin from damage due to high temperature". This position is confirmed in a Safety Evaluation prepared by the NRC in support of Amendment No. 31 to DPR-44 (Unit 2) dated February 24, 1977. Further, the equipment used in this trip system is not safety grade and only a single sensor is utilized. When these factors are considered along with the fact that the jumper was applied for a period of less than 3 hours, it can be concluded that the safety significance of this event is minimal.

Cause of the Event:

Investigation revealed that high temperature was not present in the RWCU non-regenerative heat exchanger discharge, hence, it was concluded that this was a false initiation. The decision was made to jumper the temperature switch to de-isolate the system so that reactor water level control via RWCU could be continued.

The decision to bypass the trip was based upon the information that actual temperature was not in excess of the setpoint, the fact that the RWCU was being utilized to control reactor level, and the knowledge that this isolation only serves to protect the demineralizer resin.

Further investigation tracked the difficulty to a frayed wire which was causing a short circuit in the temperature switch.

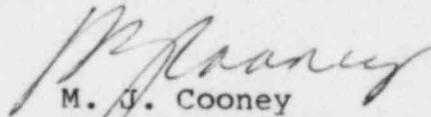
Corrective Action:

Alternate means were established for maintaining reactor level and the RWCU system was re-isolated within three hours. During this time, reactor operators monitored the RWCU temperature by utilizing different instrumentation. The faulty wiring has been repaired.

Future Correction Actions:

An investigation is underway to determine the feasibility of requesting an amendment to Technical Specification which would remove this trip from Table 3.2.A.

Very truly yours,



M. J. Cooney
Superintendent
Generation Division-Nuclear

Attachment

cc: Mr. Norman M. Haller, Director
Office of Management & Program Analysis
U.S. Nuclear Regulatory Commission
Washington, DC 20555

R. Blough, Site Inspector
Peach Bottom