

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-5001

SHIELDS L. DALTROFF  
VICE PRESIDENT  
ELECTRIC PRODUCTION

December 30, 1982

Docket Nos: 50-277  
50-278

Mr. Richard W. Starostecki, Director  
Division of Project and Resident Programs  
United States Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

Dear Mr. Starostecki:

Your letter of December 3, 1982, forwarded combined Inspection Report 50-277/82-16 and 50-278/82-16. Appendix A addresses one item which does not appear to be in full compliance with Nuclear Regulatory Commission Requirements. This item is restated below along with our response.

- A.1 Technical Specification 3.14.B requires a continuous fire watch in the Diesel Generator area if the Diesel Generator Carbon Dioxide Fire Suppression System storage tank pressure is less than 280 psig.

Contrary to the above, from 9:45 AM to 3:45 PM on October 21, 1982, the Diesel Generator Building Carbon Dioxide Fire Suppression System storage tank pressure was less than or equal to 260 psig and there was no fire watch in the Diesel Generator area.

This is a Severity Level IV Violation (Supplement I) applicable to DPR-44 and DPR-56.

Response:

This violation was caused by personnel error. Upon discovery of the low tank pressure, a fire watch was posted until proper tank pressure was attained.

The Cardox system was removed from service and blocked for minor maintenance at 8:35 A.M. on October 21, 1982. As required, a fire watch was posted. Maintenance work was completed, the blocking cleared and the system returned to service at about 9:45 A.M. The operator who returned the system to service failed to recognize the significance of the low cardox tank pressure. He incorrectly assumed a full level reading on the tank was sufficient to meet requirements, and after returning the Cardox system to service, mistakenly released the fire watch.

Calculations indicate that at the estimated minimum pressure during this occurrence of 245 psig, sufficient carbon dioxide would have been delivered to exceed the desired 34% carbon dioxide concentration during the one minute automatic discharge cycle.

The individual responsible for releasing the fire watch has been counselled and a shift night order was issued reminding personnel of the cardox tank pressure requirement.

Sincerely,



cc: Site Inspector  
Peach Bottom