

## NOTICE OF VIOLATION

PECO Energy  
Peach Bottom Atomic Power Station  
Units 1 and 2

Docket Nos. 50-277, 50-278  
License Nos. DPR-44, DPR-56  
EA 93-290

During an NRC inspection conducted on October 4-8, 1993, and November 8-10, 1993, violations of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (10 CFR Part 2, Appendix (C)), the following violations are listed below:

Technical Specification (TS) 6.11 requires that procedures for personnel radiation protection shall be prepared consistent with requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

Licensee Radiation Protection Procedure A-C-107, "Radiation Work Permit (RWP) and Radiological Controlled Area (RCA) Access Requirements", requires that individuals be responsible for (a) complying with established posting in the RCA; (b) complying with the requirements of the appropriate RWP; (c) notifying Health Physics (HP) of any radiological problems encountered during RCA entries; (d) notifying HP of any change in radiological conditions during RCA entries; and (e) complying with written and oral radiological instructions given by HP.

1. Contrary to the above, on October 27, 1993, a plant equipment operator entered an area in proximity to the Unit 3 fuel pool heat exchanger, an area visibly posted as a "high radiation area (HRA), radiation work permit (RWP) required," and the individual did not comply with the requirements of the applicable standing operations radiation work permit. Specifically, the individual did not obtain the required area pre-entry briefing and did not obtain the required alarming dosimeter or positive radiation protection coverage. (01013)
2. Contrary to the above, on October 28, 1993, a system manager (engineer) entered an area in proximity to the Unit 3 fuel pool heat exchanger, an area visibly posted as a "HRA, RWP required," and the individual did not comply with the requirements of the applicable standing RWP. Specifically, the individual did not obtain the required area pre-entry briefing and did not obtain the required alarming dosimeter or positive radiation protection coverage. (01023)
3. Contrary to the above, on October 29, 1993, an engineer entered the Unit 3 drywell 135' elevation, near residual heat removal valve No. 46B, an area visibly posted as "respiratory protection required," and the individual did not comply with the requirements of the applicable RWP or with the radiological instructions given by health physics. Specifically, the individual entered the

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posted area without the required respiratory protection equipment, despite having been told not to do so by radiation protection personnel. (01033)

This is a Severity Level III problem (Supplement IV)

Pursuant to the provisions of 10 CFR 2.201, PECO Energy is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region I, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for each violation, or, if contested, the basis for disputing each violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time. Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

Dated at King of Prussia, Pennsylvania  
this 4th day of January 1994

PECO Energy

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