

APPENDIX A

NOTICE OF VIOLATION

Philadelphia Electric Company  
Peach Bottom Atomic Power Station  
Unit Nos. 2 & 3

Docket No. 50-277  
50-278  
License No. DPR-44  
DPR-56

The inspection conducted from September 24 through October 29, 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 Actions):

10 CFR 50.55a(g) requires implementation of an Inservice Testing (IST) program for pumps and valves whose function is required for safety in accordance with the applicable edition of the ASME Boiler and Pressure Vessel Code, Section XI. The applicable edition of the Code for the purpose of the IST program is the 1980 Edition through Winter of 1981 addenda. Three examples of failure to adequately implement the provisions of the Code in administrative and technical procedures were identified:

1. Section XI, Article IWV 3410, requires that Category A and B valves that cannot be exercised every 3 months during plant operation shall be exercised during cold shutdowns. The "Peach Bottom Atomic Power Station Units 2 and 3 Pump and Valve Inservice Testing Program," Section 5.2.2, states that valve testing will commence within 48 hours after reaching cold shutdown and will continue until all tests are complete or the plant is ready to return to power. Any testing not completed at one cold shutdown will be performed during subsequent cold shutdowns.

Contrary to the above, as of October 29, 1990, the licensee's IST program scheduling and implementing procedures did not contain provisions to ensure that cold shutdown testing is initiated consistently and in a timely manner, nor to ensure that all components are tested during periods of cold shutdown. As a result, not all required testing was conducted during periods of cold shutdown during this operating cycle.

2. Section XI, Article IWV 3510, requires that safety and relief valves be periodically tested. The licensee's IST program submittal requests exemption from IWV 3510, and use of ANSI/ASME OM-1-1981 as an alternative test requirement. Both IWV 3510 and OM-1 require that when a valve fails to function properly during a regular test, an additional sample of valves will be tested.

Contrary to the above, as of October 29, 1990, the licensee had not establish IST program implementing procedures or responsibilities to ensure that the expanded test sample required following a test failure would be performed.

3. Section XI, Article IWV 3410, states that Category A and B valves shall be exercised at least once every 3 months. The necessary valve disk movement shall be determined by

observing an appropriate indicator or observing indirect evidence, such as changes in system pressure or flow rate, which reflect disk position. The "Peach Bottom Atomic Power Station Units 2 and 3 Pump and Valve Inservice Testing Program," states that the core spray and residual heat removal minimum flow line check valves will be exercise tested quarterly in the forward direction.

Contrary to the above, as of October 29, 1990, the licensee had not established technically adequate procedures for performance of the forward direction testing of the core spray and residual heat removal minimum flow line check valves in that the procedures did not require observation of either direct or indirect evidence of valve disk movement.

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.