

DCS

NOV 29 1990

Docket Nos. 50-277
50-278

Philadelphia Electric Company
ATTN: Mr. D. M. Smith
Senior Vice President-Nuclear
Nuclear Group Headquarters
Correspondence Control Desk
P. O. Box 195
Wayne, Pennsylvania 19087-0195

Gentlemen:

Subject: Inspection No. 50-278/90-15 and 50-277/90-15

This refers to your letter dated October 17, 1990, in response to our letter dated September 6, 1990.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:
Jacque P. Durr

Jacque P. Durr, Chief
Engineering Branch
Division of Reactor Safety

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Philadelphia Electric Company

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cc:

D. R. Helwig, Vice President, Nuclear Engineering and Services
R. J. Lees, Chairman, Nuclear Review Board
D. B. Miller, Vice President, Peach Bottom Atomic Power Station
J. Urban, General Manager, Fuels Department, Delmarva Power & Light Co.
J. F. Franz, Plant Manager, Peach Bottom Atomic Power Station
A. A. Fulvio, Regulatory Engineer, Peach Bottom Atomic Power Station
E. P. Fogarty, Project Manager, Peach Bottom Atomic Power Station
T. B. Conner, Jr., Esquire
W. H. Hirst, Director, Joint Generation Projects Department,
Atlantic Electric
B. W. Gorman, Manager, External Affairs
E. J. Cullen, Esquire, Assistant General Counsel (Without Report)
R. L. Hovis, Esquire
R. McLean, Power Plant Siting, Nuclear Evaluations
G. Hunger, Manager, Licensing Section
D. Poulsen, Secretary of Harford County Council
J. H. Walter, Chief Engineer, Public Service Commission of Maryland
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
K. Abraham, PAO (34) SALP Report and (2) All Inspection Reports
NRC Resident Inspector
Commonwealth of Pennsylvania

bcc:

Region I Docket Room (with concurrences)
Management Assistant, DRMA (w/o encl)
R. Bellamy, DRSS
R. Blough, DRP
P. Kaufman, DRP
L. Doerflein, DRP
M. Conner, DRP (SALP Reports Only)
M. Miller, SLO
J. Caldwell, EDO
G. Suh, NRR

RI:DRS
Lara/gcb

10/30/90

RI:DRS
Anderson

10/30/90

RI:DRS
Durr

10/29/90

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PEACH BOTTOM—THE POWER OF EXCELLENCE

PHILADELPHIA ELECTRIC COMPANY

PEACH BOTTOM ATOMIC POWER STATION

R. D. 1, Box 208

Delta, Pennsylvania 17314

(717) 456-7014

D. B. Miller, Jr.
Vice President

October 17, 1990

Docket Nos. 50-277
50-278

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

SUBJECT: Peach Bottom Atomic Power Station - Units 2 & 3
Response to Notice of Violation
(Combined Inspection Report Nos. 50-277/90-15; 50-278/90-15)

Dear Sir,

In response to your letter dated September 6, 1990, which transmitted the subject Inspection Report and Notice of Violation, we submit the attached response. The subject Inspection Report concerns a routine inspection of maintenance activities on the emergency diesel generators during the period July 23-27, 1990. The date of response to the Notice of Violation was changed to allow thirty days after receipt of the transmitted notice, which arrived September 17, 1990. This agreement was made between Jacque Durr of your staff and Al Fulvio, Regulatory Engineer on September 24, 1990.

If you have any questions or require additional information, please do not hesitate to contact us.

Sincerely,

cc: R. A. Burricelli, Public Service Electric & Gas
T. M. Gerusky, Commonwealth of Pennsylvania
J. J. Lyash, USNRC Senior Resident Inspector
T. T. Martin, Administrator, Region I, USNRC
H. C. Schwemm, Atlantic Electric
R. I. McLean, State of Maryland
J. Urban, Delmarva Power

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bcc: J. A. Basilio	52A-5, Chesterbrook
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J. F. Franz	A4-1S, Peach Bottom
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PB Nuclear Records	A4-2S, Peach Bottom
J. M. Pratt	B-2-S, Peach Bottom
L. B. Pyrih	63B-5, Chesterbrook
J. T. Robb	51A-13, Chesterbrook
D. M. Smith	52C-7, Chesterbrook

ATTACHMENT

Response to Notice of Violation 90-15-01

Restatement of Violation

10 CFR 50, Appendix B, Criterion V, requires in part that activities affecting safety shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these procedures.

PBAFS QA Plan PR 5.0, "Instructions, Procedures, and Drawings" delineates this requirement by requiring that activities be accomplished in accordance with procedures prescribed by procedure manuals or test procedures. Quantitative criteria, such as dimensions or tolerances, shall be specified for determining satisfactory work performance.

Contrary to the above, on July 27, 1990, work activities were not accomplished in accordance with established procedure MP-052-001, "Diesel Generator Maintenance", in that as-left tolerance limits for EDG brush forces were exceeded and this condition did not receive an adequate, independent review as required by the procedure.

This is a Severity Level IV Violation. (Supplement 1).

Cause of Violation

The craftsman that adjusted the spring pressure on the brushes misinterpreted the fractional values on the spring scale and incorrectly applied those values to the as-left limits of the procedure. The procedure listed decimal values from 1.75 lbs. to 2.25 lbs. as acceptable for the as-left brush force. The craftsman however transcribed readings of 2 1/2 lbs. from the spring scale and thought they were equal to 2.25 lbs. as found in the procedure. The craftsman then signed off the procedure as acceptable.

The craftsman then informed the individual performing the independent review that he was to look for a maximum value of 2 1/2 lbs. for the as-left value. The independent reviewer neither questioned or verified this instruction. Noting that all the as-left values were 2 1/2 lbs. or less, the independent reviewer also signed off the procedure as acceptable.

A final review of the procedure and work package was performed by Maintenance Supervision, but did not identify the out of tolerance values.

Corrective Actions Taken and Results Achieved

An acceptability evaluation was initiated promptly after the as-left brush force values were found to have exceeded the maximum limit. This evaluation determined that the as-left values would have no detrimental effects on the diesel generator. Based on this evaluation it was determined to leave the brush force values at the current setting.

This incident was discussed with the individuals involved as well as other team members that perform this task during diesel outages. Attention to detail and procedural compliance were stressed.

The responsibilities of an independent reviewer and supervision review of completed work packages were discussed during a team quality awareness meeting held on September 20, 1990. This incident was discussed as well as the process of independent verification.

A review of three other diesel generator maintenance procedures was conducted to determine if there were any prior discrepancies with as-found or as-left brush force values. The previous brush force values were all found to be within the specified tolerance range of the procedure.

Corrective Steps Taken That Will Avoid Future Violations

The process of independent verification will be discussed in future maintenance team meetings. This will be completed by December 31, 1990.

Maintenance Procedure M-052-001, "Diesel Generator Maintenance", will be revised so that the as-left brush force values will be indicated in both their decimal and fractional values. This revision will eliminate the need for scale conversions in the field while performing the procedure.

Additionally, a more accurate spring scale will be purchased to minimize personnel and measurement error. The new spring scale will be more reliable and will display a digital decimal readout. This will reduce discrepancies in recording field values and transferring them to the procedure. A training session will be conducted with the appropriate craft before the use of this instrument. The responsibilities of reviewing data and independent verification will be re-emphasized during this training as well. These actions will be completed prior to the next diesel outage, scheduled for June 1991.

Date Full Compliance Was Achieved

Full compliance was achieved July 26, 1990 when the as-left brush force values were evaluated and found to be acceptable by the manufacturer and maintenance engineering.