

**PHILADELPHIA ELECTRIC COMPANY**

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-5001

SHIELDS L. DALTROFF  
VICE PRESIDENT  
ELECTRIC PRODUCTION

August 16, 1982

Re: Docket Nos. 50-277  
50-278

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

Dear Mr. Starostecki:

Your letter of July 15, 1982 forwarded the Systematic Assessment of Licensee Performance (SALP) report for Peach Bottom Atomic Power Station and was followed up by a meeting on July 27, 1982, to discuss the report findings and our proposed corrective actions. Philadelphia Electric Company appreciates the opportunity to have met with you to discuss our performance and to comment on your report findings. We believe this annual opportunity to meet with the NRC management to discuss your views relating to our operation is beneficial and productive. During our meeting we had the opportunity to exchange viewpoints and comment on certain portions of your report. We also indicated proposed corrective actions for those areas where NRC expressed concerns. This report will formalize our proposed corrective actions as was requested in your letter.

A special advisory letter has been sent by appropriate Vice Presidents to each of their Supervisors working at Peach Bottom Station. This letter emphasizes the Supervisors' responsibilities in maintaining a high level of work performance, particularly in the areas of health physics, housekeeping and safety. In addition, special management meetings have been

scheduled with personnel to increase the awareness of each individual to the importance of following nuclear rules and procedures.

We believe that most of the identified weaknesses are primarily in first line supervision and craftsmen support and are not programmatic. The extremely long refueling/modification outages the past two years have significantly increased the site manpower requirements and have contributed to deficiencies noted in the SALP report. Philadelphia Electric Company management remains committed to addressing deficiencies and improving operations where required.

Following are our responses to specific NRC comments identified in the SALP report.

#### Plant Operations

##### SALP Comment

"Although decision making is usually at a level that ensures adequate management review, shift-to-management communications have caused occasional problems in this area."

"Day-to-day onshift supervision and control of operations needs to be more thorough and aggressive."

##### Response

A series of meetings were held last winter with operating shift and supervisory personnel to stress the importance of keeping plant management informed of plant status and activities and supervisory responsibility regarding control of operations in accordance with Technical Specifications. These meetings were conducted by the Station Superintendent and the Operations Engineer.

There are two Senior Engineer level people on call at all times for notification and decision making. These individuals carry "beepers" to provide prompt response to operator questions or changes in plant status. Plant

management requires shift-to-management communications with senior duty engineers, particularly on weekends and holidays. The importance of notifying the senior duty engineers of plant conditions and exceptions will be stressed again during the next meetings with operating personnel.

SALP Comment

"During the assessment period, the licensee improved his responsiveness to alarm conditions... About 5 years ago a typical PECO. response would have been to assume annunciator failure without investigation."

Response

In recent years, Philadelphia Electric Company has taken a more conservative approach to inoperable annunciators and has limited the time that plant and equipment operation is continued with alarm failures. We would emphasize, however, that it has never been our policy to assume annunciator failure when an alarm is received without further investigation. Other instrumentation is reviewed and the acceptability of the alarming parameter is confirmed before operation with a non-functioning alarm is continued.

We believe it was the intent of the SALP report to comment on our more conservative approach in responding to inoperable annunciators rather than a failure to investigate when an alarm is received.

Radiological Controls

SALP Comment

"The licensee's Radiation Protection Program should receive increased emphasis..."

Response

In order to improve performance and control of our Radiation Protection Program, we have developed an Action Plan to delineate specific steps to be taken in the health physics and radiation protection areas. The Action Plan was developed using the following inputs:

- a) NRC Inspections and Health Physics Appraisal
- b) Special assessment audit of our health physics program conducted by INPO at the request of Philadelphia Electric Company.
- c) Philadelphia Electric Company management recommendations.

We believe the Action Plan is a comprehensive and effective means to improve our Radiation Protection Program. Steps have already been taken to implement the items identified in the plan. Bi-weekly updates and review of incomplete actions will ensure prompt attention to all items.

A copy of the Action Plan has been provided to the Peach Bottom NRC Resident Inspector for his information.

SALP Comment

"...licensee management has not placed sufficient emphasis on overall radiation protection program or on ALARA."

Response

Philadelphia Electric Company has formally adopted the ALARA plan which has been in trial use since October, 1981. Additional personnel have recently been assigned to implementing the ALARA effort. ALARA was also a specific item addressed in the aforementioned letter from appropriate Vice Presidents to their Supervisors. Further, suggestions from INPO and procedures utilized at other facilities are being examined for possible implementation.

SALP Comment

"...a qualified Radiation Protection Manager does not, currently, supervise the radiation protection program."

Response

Philadelphia Electric Company formally designated an individual qualified to the requirements of Regulatory Guide 1.8, September, 1975, "Guidelines for Radiation Protection Managers Qualifications" in a Technical Specification submitted on June 3, 1980. Since our original submittal, we have provided two additional amendments to reflect organization and personnel changes. In each case, an individual qualified to the requirements of Regulatory Guide 1.8 was designated.

Our most recent submittal, dated July 7, 1982, reflects the addition of a new supervisor at the senior staff level with responsibility for the plant's radiation and chemistry programs. Although we recognize there was some delay in formally designating this individual as the Radiation Protection Manager, he has been acting in this capacity since January, 1982. Prior to January, 1982, other qualified individuals filled this position.

MaintenanceSALP Comment

"The Licensee has difficulty coordinating outstanding maintenance actions. Coordination is manual and, on occasion, not all needed or due maintenance is completed on equipment when it is taken out of service for repair."

Response

We are in the process of developing and implementing two new computerized maintenance programs to provide better scheduling and tracking of maintenance activities. The Project Resource Evaluation and Management Information System (PREMIS) program will schedule maintenance activities based on resources and priority of various tasks. PREMIS will replace the outmoded PMS IV program which requires a significant amount of manual input. The Computerized History and Maintenance Program System (CHAMPS) will track and provide listings when maintenance is due on equipment and will maintain a history of work when it is completed.

We expect these programs to be operable for use during the next Unit 3 refueling outage.

SALP Comment

"...better first line supervision and control of maintenance is needed. An example is the housekeeping and contamination control problems associated with the recent Unit 2 outage..."

Response

In order to provide better first line supervision of maintenance activities, particularly in the area of housekeeping and fire protection, a program has been initiated to provide improved accountability. Maintenance first line supervision must now complete a form which establishes work location, status of the area with respect to housekeeping and fire protection, and actions taken when appropriate. These forms will be reviewed and inspections made to reinforce the importance of improved performance in these areas.

Housekeeping & Fire Protection

SALP Comment

"The Philadelphia Electric Company has a history of poor management attention to fire protection and housekeeping... The problem recurs and does not appear to receive sufficient corporate management attention."

Response

Philadelphia Electric Company recognizes that housekeeping has been a problem at Peach Bottom and has taken special steps to improve our performance. We also recognize that poor housekeeping can lead to potential fire safety problems, however, we do not feel this is sufficient to indicate poor management attention to fire protection. On the contrary, during the SALP review period, there were numerous steps taken to improve our overall fire protection program at Peach Bottom including a significant increase in the number of smoke detectors, additional fire suppression systems, improved fire brigade training and equipment, and additional oil containment curbs. Management has always placed major emphasis on our overall fire protection program and will continue to do so.

We continue to take action to improve housekeeping. Prior to the last refueling outage all site maintenance personnel were reminded of the importance of good housekeeping

practices. The subject was also stressed at almost every daily outage meeting. On one occasion, all work in the drywell was stopped to correct unsatisfactory housekeeping.

Additional steps were taken during and after the outage to further improve housekeeping and fire protection practices. These steps include the following:

- a) In May, 1982, the Station Superintendent held discussions with group supervisors to increase effective control of plant housekeeping. As a result of these discussions contractor, maintenance, and construction supervisors would inspect their respective work areas to ensure that housekeeping guidelines were being followed. Their findings were reported to their supervision and the outage manager.
- b) A control point operating procedure is being written to address the actions to be taken by health physics technicians to provide better housekeeping and fire protection at control points.
- c) Shift supervision and health physics personnel increased their housekeeping inspections during periods of high activity.
- d) A letter dated July 15, 1982, from the Station Superintendent to all Peach Bottom personnel was distributed to emphasize the importance of following nuclear rules; particularly in the areas of safety, housekeeping, fire protection, and health physics. Further, any individual violating the Nuclear Plant Rules will be restricted from the Protected Area pending an investigation and appropriate corrective measures.
- e) A Maintenance procedure was developed and implemented which requires each Subforeman to document the status of his work locations as far as housekeeping and fire protection are concerned. Corrective actions taken are also noted and these forms are reviewed by maintenance supervision.

Philadelphia Electric Company is committed to providing a safe, clean working environment for all Peach Bottom personnel. We will continue to work to improve housekeeping and fire protection.

Security and Safeguards

SALP Comment

"The licensee's accepted Physical Security Plan is inconsistent with current standards in several areas."

Response

Although the SALP Report was not specific enough to address individual items, we recognize that some inconsistencies do exist. However, compensating measures have been taken where appropriate to provide a level of security consistent with current standards. The current Peach Bottom Physical Security Plan was thoroughly reviewed and evaluated by the NRC. Based on overall evaluation of our plan, our approach was determined to be acceptable to meet security standards.

If you have any questions or wish to discuss any part of the SALP report further, please don't hesitate to contact us.

Very truly yours,

A handwritten signature in cursive script, appearing to read "R. W. Starostecki".

cc: Peach Bottom  
Site Inspector