

APPENDIX A
NOTICE OF VIOLATION

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

Docket 50-277
50-278
License DPR-44
DPR-56

During an NRC inspection conducted from October 30 through December 3, 1990, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1990) the violations are listed below:

- A. The Code of Federal Regulations, Title 10, Part 50, Appendix B, Criterion XVI, "Corrective Action," states in part that measures shall be established to assure that conditions adverse to quality, such as defective material and equipment, are promptly identified and corrected.
1. Contrary to the above, on November 5, 1990, a leak was caused and identified in the supply line from the seismically qualified nitrogen supply to the boot seal of inboard primary containment isolation valve AO-2520. Immediate corrective actions were not implemented and the bottle depressurized to zero psig. Since the outboard valve was already inoperable with its boot seal deflated, a potential primary containment leak path would have existed in the event of a design basis accident.
 2. Contrary to the above, on May 3-4, 1990, and since August 29, 1990, primary containment isolation valve AO-2519 was inoperable. Data collected during daily surveillances indicated that leakage in excess of the allowable existed, making the seismically qualified backup nitrogen supply inadequate to assure valve operability. Philadelphia Electric Company did not declare the valve inoperable, and did not initiate action to promptly repair the valve.

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

- B. Technical Specification (TS) 6.8.1 states that written procedures and administrative policies shall be established and implemented that meet the requirements of ANSI N18.7-1972, Section 5.3, and Regulatory Guide (RG) 1.33 (1972). ANSI N18-7, Section 5.3.6, and RG 1.33, Section H, require procedures for the control, storage and use of measuring and test equipment (M&TE). TS 6.5.16 states that the Plant Operation Review Committee (PORC) shall be responsible for review of all procedures required by TS 6.8.

Contrary to the above, as of December 3, 1990, the licensee had not established or implemented a PORC approved procedure addressing the control, storage and use of M&TE as required by the TS 6.8.1 and 6.5.16.

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

Pursuant to the provisions of 10 CFR 2.201, Philadelphia Electric Company 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 the NRC Senior Resident Inspector, within 30 days of the date of receipt of the letter that transmitted this 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 the violation, or, if contested, the basis for disputing the violation; (2) the corrective steps taken and the results achieved; (3) the corrective steps that will be taken to avoid further violations, and (3) the date when full compliance will be achieved. If an adequate response is not received within the time specified in the Notice, an order 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.

Dated at King of Prussia, PA
this 28 day of December, 1990