

APPENDIX A

NOTICE OF VIOLATION

Philadelphia Electric Company
Peach Bottom Units 2 and 3

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

During inspection on September 16 - October 20, 1982, the following violations were identified under the NRC Enforcement Policy (10CFR2 Appendix C), 47FR9887 (March 9, 1982).

A.1 Technical Specification 6.8 and Regulatory Guide 1.33 (November 1972) require implementation of procedures for the fire protection system. Administrative Procedure 12.1, Revision 3, April 23, 1982, Procedure for Controlling Technical Specification Fire Watch and Fire Watch Patrols, states that the fire watch shall have no other duties, a fire watch instruction sheet shall be completed and provided to the fire watch, and equipment status shall be logged on the Fire System Status Sheet.

A.1.1 Contrary to the above, from 2:30 p.m. to 4:00 p.m. on July 25, 1982, a fire watch posted at an inoperable fire barrier between the Cable Spreading Room and the Radwaste Building had concurrent duties, in that he was a member of the minimum armed response force, required by the Accepted Security Plan to be available at all times to respond to a security alert.

A.1.2 Contrary to the above, from July 24 to July 26, 1982, no fire watch instruction sheet was completed and provided to the fire watch at the inoperable fire barrier between the Cable Spreading Room and the Radwaste Building. Further, the inoperable barrier was not logged on the Fire System Status Sheet.

This is a Severity Level IV Violation applicable to DPR-44 and DPR-56.

A.2 Technical Specification 6.8 and Regulatory Guide 1.33 require implementation of procedures for equipment control. Administrative Procedure A-8, Revision 4, January 22, 1980, Procedure for Control of Locked Valves, and Appendix A-8C, Revision 6, April 1, 1982, require that valves on the Locked Valve Lists be locked with a padlock and chain unless maintenance or operations in progress require otherwise.

Contrary to the above, at 10:00 a.m. on September 21, 1982, Emergency Service Water System Valve 519C, Inlet to the 'C' Diesel, listed on Locked Valve List A-8C was not locked and no related operations or maintenance were in progress.

This is a Severity Level IV Violation (Supplement I) applicable to DPR-44 and DPR-56.

- A.3 Technical Specification 6.11, Radiation Protection Program, requires adherence to procedures for personnel radiation protection. Procedure HPO/CO-4, Revision 17, December 18, 1981, Radiation Work Permits, requires personnel to comply with the applicable Radiation Work Permit (RWP). RWP 2-94-0624, September 18, 1982, Unit 2 Torus Room Mod 651, required personnel to have alarming dosimeters.

Contrary to the above, from about 1:10 p.m. to 2:45 p.m., October 12, 1982, three persons in the Unit 2 Torus Room performing work governed by RWP 2-94-0624 did not have alarming dosimeters.

This is a Severity Level IV Violation (Supplement IV) applicable to DPR-44.

Pursuant to 10 CFR 2.201, Philadelphia Electric Company is hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply including the corrective steps which have been taken and results achieved, corrective steps which will be taken to avoid further violations, and the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation. Where good cause is shown, consideration will be given to extending your response time.