

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET
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SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

(215) 841-5001

November 9, 1982

Re: Docket Nos. 50-277
50-278

Insp. Report 50-277/82-14
50-278/82-14

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

Dear Mr. Starostecki:

The purpose of this letter is to revise the response contained in my September 29, 1982, letter (S. L. Daltroff to R. Starostecki) which addressed an apparent item of non-compliance contained in Combined Inspection Report 50-277/82-14 and 50-278/82-14. This item, categorized as a Severity Level IV violation, is restated below along with our revised response. This revision clarifies the issue of door lock function and key control and is indicated by a vertical bar in the margin of the response.

1. Technical Specification 6.13, "High Radiation Area", requires high radiation areas where the intensity of radiation is greater than 1000 millirem per hour to be provided with locked doors to prevent unauthorized entry.

Contrary to the above, about 3:45 PM on July 8, 1982, the intensity of radiation exceeded 1000 millirem per hour in the 3B Mechanical Compressor Room and the door to the room was not locked.

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

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Response

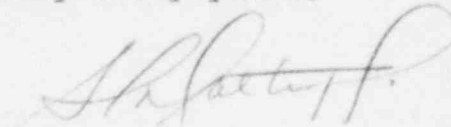
The violation was caused by equipment failure. The surveillance test which verifies that High Radiation doors are locked was completed satisfactorily on the previous day, July 7, 1982. Upon notification by the inspector of the deficiency, shift personnel immediately chained and padlocked the door to control access. Thus, the door could not have been unlocked for more than one day.

The door locking mechanisms used at Peach Bottom on High Radiation Area doors lock upon door closure. Only a defective mechanism or the manual unlocking of the mechanism with a special key, limited in distribution to senior plant staff personnel, would allow the door to remain unlocked. Investigation revealed that the door in question had a defective locking mechanism. This mechanism was replaced on July 13, 1982.

Health Physics personnel have been instructed to more forcefully check the locked doors when performing the High Radiation Door Lock Survey Surveillance Test in order to increase the likelihood of detecting potentially defective locking mechanisms.

If there are any further questions, do not hesitate to contact us.

Very truly yours,



cc: Site Inspector
Peach Bottom