

APPENDIX A

NOTICE OF VIOLATION

Philadelphia Electric Company
Peach Bottom Unit 2

Docket/License: 50-277/DPR-44

As a result of the inspection conducted on December 1, 1982 - January 10, 1983, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C) published in the Federal Register on March 9, 1982 (47 FR 9987), the following violation was identified:

A.1 Technical Specification 6.8.1 requires implementation of procedures that cover the area listed in Appendix A of Regulatory Guide 1.33 (November 1972), which lists written procedures for surveillance testing and for control of maintenance.

A.1.1 FSAR Appendix C and Section 4.4 indicate that the Automatic Depressurization System (ADS), including the Back-up Nitrogen Supply, is seismically qualified. Surveillance Test Procedure ST 7.9.2, Daily Check of Containment Isolation Valve, ADS Back-up N2, and CAD System Bottle Pressure, requires visual verification that each bottle, including ADS Back-up Nitrogen Bottle 'C', is seismically restrained.

Contrary to the above, from December 17, 1982 to January 3, 1983, seismic qualification of the ADS Back-up Nitrogen Supply was invalidated in that Back-up Nitrogen Bottle 'C' was out of its seismically designed restraint rack and secured only by a piece of rope; and ST 7.9.2 daily checks did not identify this condition.

A.1.2 Administrative Procedure A-26, Procedure for Corrective Maintenance, requires that system malfunctions be investigated when noticed, that a maintenance request form (MRF) be issued if the problem cannot be corrected within about eight hours, and that corrective maintenance be performed through use of an MRF.

Contrary to the above, malfunctioning (failure to open) of Unit 2 main steam line drain valves MO-2-74 and MO-2-77 was not investigated when noticed during surveillance testing on December 30, 1982, no MRF was issued before January 4, 1983, and the malfunctioning was not corrected until January 5, 1983.

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

Pursuant to the provisions of 10 CFR 2.201, Philadelphia Electric Company is hereby required to submit to this office within 30 days of the date of the letter transmitting this Notice, a written statement or explanation in reply,

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including for each violation: (1) the corrective steps which have been taken and the results achieved; (2) the corrective steps which will be taken to avoid further violations, and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.