

PHILADELPHIA ELECTRIC COMPANY

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SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

February 17, 1983

Re: Docket Nos. 50-277/82-24
50-278/82-23

Mr. Thomas T. Martin, Director
Division of Engineering and Technical Programs
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Martin:

Your letter of January 18, 1983, forwarded combined Inspection Report 50-277/82-24 and 50-278/82-23. Appendix A addresses one item which does not appear to be in full compliance with Nuclear Regulatory Commission requirements. This item is restated below along with our response.

10 CFR 50 Appendix R, Section III.I states that the fire brigade training program shall ensure that the capability to fight potential fires is established and maintained and shall include the following:

- Regular planned meetings held at least every three months for all brigade members.
- Periodic refresher training sessions to repeat the classroom instruction for all brigade members over a two year period.

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- Practice sessions in actual fire extinguishment at least once per year for each brigade member.

PBAPS Fire Protection Plan, Revision 3, dated April 29, 1982 establishes the responsibilities for the fire brigade training and includes the following:

- Regular planned meetings at least every three months for all brigade members.
- Periodic refresher training sessions at least every two years.
- Practice sessions provided at least once per year for each fire brigade member.

Contrary to the above, as of December 16, 1982:

1. - Two members of the fire brigade had not attended regular planned meetings at least every three months.
2. - One member of the fire brigade had not attended periodic refresher training sessions at least every two years. Further, a periodic refresher training program had not yet been established.
3. - Four members of the fire brigade team had not participated in practice sessions at least once per year.

This is a Severity Level V violation (Supplement 1)

RESPONSE

1. The fire brigade at PRAPS is made up of members of the operating shift. The regularly planned fire brigade meetings are held monthly at the beginning of each

designated shift. The one individual who did not attend the required meetings was in Licensed Operator Training which removed him from his normal shift for several months and therefore, he was not available to attend the meetings. The other individual was on sick leave for several months and likewise was unable to attend the meetings. These involvements plus the lack of a tracking mechanism to ensure completion of required training caused this event. Upon returning to shift responsibilities, the individuals resumed the normal frequency of attendance to planned brigade meetings.

RESPONSE

2. The fire brigade member who did not attend the annual refresher training session was inadvertently missed, again due to an inadequate tracking mechanism. The individual will be scheduled to attend the refresher class by April 30, 1983.

Personnel and training responsibility changes, since the initial fire brigade classroom training took place, caused a lack of continuity in instruction. The program is being reviewed and brought up to date so that a periodic refresher training program can be implemented by March 15, 1983.

RESPONSE

3. The four members of the fire brigade not having participated in an annual practice session resulted from two occurrences: first, an insufficient number of training sessions offered during the year; second, conflicts which arose because of this limited number of sessions and operating shift personnel scheduling requirements. The four individuals will be scheduled for this training by April 30, 1983.

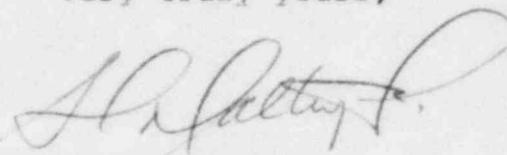
Philadelphia Electric Company recognizes the need to ensure fire brigade training participation for each member of the fire brigade. A proper tracking mechanism will be provided to ensure that the minimum training requirements are met for appropriate personnel. This tracking mechanism will be established by May 1, 1983.

Mr. T. Martin

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If any additional information is required, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in cursive script, appearing to read "J. H. Salter". The signature is written in dark ink and is positioned to the right of the typed closing "Very truly yours,".

cc: Site Inspector
Peach Bottom