

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

JOSEPH W. GALLAGHER
MANAGER
ELECTRIC PRODUCTION DEPARTMENT

(215) 841-5003

February 25, 1983

Re: Docket Nos. 50-277/82-25
50-278/82-24

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

Dear Mr. Starostecki:

Your letter of January 28, 1983, forwarded Combined Inspection Report 50-277/82-25 and 50-278/82-24. 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.

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 a 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.

Response to A.1.1:

Nitrogen bottles used in the ADS Back-Up Nitrogen Supply system vary slightly in diameter -- to within one quarter inch of each other. All but the largest bottles will fit into the seismically designed restraint rack. The bottle in question was too large and therefore did not properly fit in the installed rack. Upon notification by the inspector, the 'C' bottle was replaced with a smaller bottle which did fit into the rack. Although the bottle was not in the rack at the time of this occurrence, it was connected and valved in service along with the other two bottles. Considering the long term design basis of this back-up system and the fact that a seismic event would have to occur concurrently with the long term need for the system, safety significance is minimal.

Personnel who perform this surveillance test have been counselled on the importance of seismic requirements. The surveillance test which was previously revised to include visual inspection of the seismic bottle restraints will be revised to more clearly require and detail that all bottles be placed in the installed racks and all installed restraints be secured. Additionally, an individual "restraint secured" check-off will be required for each bottle. This revision will be completed by March 1, 1983.

Response to A.1.2:

This event was caused by an administrative oversight. Upon notification by the inspector, the equipment malfunction was investigated. The thermal overloads for the valves were found in the tripped condition. The overloads were reset and the valves were stroked successfully. Since no further work was required, no maintenance request form was generated. Although the valves did not operate during the surveillance test, they were in the closed and isolated condition and were not required to be opened either to satisfactorily complete the surveillance test or to perform any safety function. Thus, safety significance is minimal.

The individuals involved in this event have been counselled by their supervision about their respective responsibilities during performance of surveillance tests.

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

Very truly yours,

JW Kellaghan

cc: Site Inspector
Peach Bottom