

APPENDIX A

NOTICE OF VIOLATION

Philadelphia Electric Company
Peach Bottom Atomic Power Station
Unit 3

Docket No. 50-278
License No. DPR-56
EA No. 91-075

During an NRC inspection conducted on April 23 through June 8, 1991, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1991), the violation is listed below:

Technical Specification 6.8.1 states, in part, that written procedures shall be established and implemented that meet the requirements of Sections 5.1 and 5.3 of ANSI N18.7-1972. ANSI N18.7-1972, Section 5.1, states that procedures shall be followed. Section 5.3 requires that 1) the purpose for which the procedure is intended be clearly stated; 2) each procedure identify the plant conditions that shall exist prior to its use, and 3) precautions be established to alert the individual performing the task to those situations in which important measures be taken early or where extreme care should be taken.

Contrary to the above, on May 29, 1991, adequate standby liquid control (SLC) system operating procedures had not been established and were not implemented. As a result, SLC solution tank temperature was raised significantly above the previously analyzed maximum temperature, placing the ability of the system to perform its intended function in an indeterminate state for about 36 hours. Specifically:

- A. Procedure SO 11.1.A-3, "Standby Liquid Control System Setup for Operation," Revision 3, did not contain adequate prerequisites and precautions. The required plant condition was not specified, and precautions were not included to identify clearly the impact of procedure performance on system operability.
- B. Procedure SO 11.7.A-3, "Standby Liquid Control System Chemical Makeup," Revision 4, did not contain adequate precautions to identify the impact of elevated temperature on SLC pump operability.
- C. Alarm Response Card Number 311, "Standby Liquid or Pipe Hi-Lo Temp," Revision 0, did not include adequate instructions to ensure proper operator response to elevated SLC solution tank temperatures.
- D. The licensed operator controlling the SLC make-up evolution did not adequately review the applicable procedures, SO 11.1.A-3 and SO 11.7.A-3, prior to or during conduct of the evolution.

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

Pursuant to the provisions of 10 CFR 2.201, Philadelphia Electric Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region I, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of receipt of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved.