

APPENDIX A

NOTICE OF VIOLATION

Philadelphia Electric Company
Peach Bottom Atomic Power Station

Docket Nos. 50-277
50-278
License No. DPR-44
DPR-56

As a result of the inspection conducted on July 18-22, 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 violations were identified:

- A. Technical Specification 6.4 requires a retraining and replacement training program for the facility staff meeting the requirements of Section 5.5 of ANSI N18.1-1971. Section 5.5 of ANSI N18.1-1971 states that means should be provided in the training program for appropriate evaluation of its effectiveness.

Contrary to the above, as of July 22, 1983, means were not provided in the training program for the appropriate evaluation of its effectiveness in that the technical performance of entry level Assistant Technicians is routinely evaluated and documented by "C" Level Technicians, who are not qualified in accordance with ANSI N18.1-1971 and are themselves entry level personnel in training. In such cases the evaluation of training effectiveness afforded to Assistant Technicians is not appropriate.

This is a Severity V violation (Supplement IV).

- B. 10 CFR 50.59, "Changes Tests and Experiments", requires that a licensee perform a written safety evaluation of changes in procedures as described in the Final Safety Analysis Report (FSAR). Chapters 9.2, "Liquid Radwaste System" and 9.3, "Solid Radwaste System" of the FSAR described certain systems and procedures for handling liquid and solid radioactive waste.

Contrary to the above, since March, 1983 the licensee has processed certain liquid radioactive waste filter sludge, and wet solid material having radiation levels as high as 11 rem per hour by a cement solidification and processing procedure that is not described in the FSAR, without a written safety evaluation providing the bases that the change in the procedure did not involve an unreviewed safety question.

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

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, 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.