

FEB 29 1984

Docket/License: 50-277/DPR-44; 50-278/DPR-56

Philadelphia Electric Company
ATTN: Mr. S. L. Daltroff
Vice President
Electric Production
2301 Market Street
Philadelphia, Pennsylvania 19101

Gentlemen:

Subject: Combined Inspection 50-277/84-01; 50-278/84-01

This transmits the findings of a special safety inspection the NRC staff conducted January 5 - 20, 1984 at the Peach Bottom Atomic Power Station, Delta, Pennsylvania. These findings were based on observation of activities, interviews, document reviews and information obtained at a management meeting held onsite on January 12, 1984, as part of this inspection.

The results of these efforts indicate a problem with your internal review process for identifying and evaluating potential unreviewed safety questions. In particular, administrative procedures were apparently followed in preparing an alternative approach for reactor shutdown; however, the safety evaluation conducted by the Plant Operations Review Committee which approved the alternate approach was inadequate to assess the safety implication of the adopted approach. Specifically, in 1977, procedures were developed to bypass the automatic features of the Rod Worth Minimizer (RWM) and Rod Sequence Control System (RSCS) as an alternative during normal reactor shutdowns. These systems are described in your Safety Analysis Report (FSAR) and are designed to automatically provide a rod positioning arrangement that could accommodate a dropped control rod without adverse safety consequences.

Control rod drop accidents are of concern during both reactor startup and reactor shutdown. As a result of discussions with your staff during the inspection, we are aware of the technical reasons why you consider this matter to be ameliorated during shutdowns at your plants. Nonetheless, we are concerned that your station procedures allowed a procedure for an alternative shutdown method (by individual rod scrambling) to be developed without adequately addressing the safety implications of the alternative methods. Following receipt of this letter, please contact us promptly to arrange for a mutually agreeable date and time for an enforcement conference. At that conference, you should be prepared to discuss the violations of NRC requirements and the unresolved items addressed in Details, Paragraph 4 of the enclosed inspection report as well as any additional information you may have gathered since the end of that inspection period.

Details 3.2.1, 3.2.2, and 4.2.2 of the enclosed report also describe commitments your staff made in partial response to issues we raised during this inspection. In addition, your staff also indicated that (1) the reactor vendor was preparing a technical assessment of this matter in response to your request, (2) individual rod scrambling to effect a reactor shutdown would not be resumed unless that as-

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assessment concluded that no safety hazard existed, and (3) Philadelphia Electric would not resume that practice until we have reviewed that assessment and concur in its conclusions. If your understanding of these commitments differs from the descriptions in this letter and report, please advise us immediately.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosures will be placed in the NRC Public Document Room unless you notify this office, by telephone, within ten days of the date of this letter and submit written application to withhold information contained therein within thirty days of the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1). The telephone notification of your intent to request withholding, or any request for an extension of the 10 day period which you believe necessary, should be made to the Supervisor, Files, Mail and Records, USNRC, Region I, at (215) 337-5223.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:

Richard W. Starostecki, Director
Division of Project and Resident
Programs

Enclosure: NRC Region I Combined Inspection Report
50-277/84-01; 50-278/84-01

cc w/encl:

R. S. Fleischmann, Station Superintendent
Troy B. Conner, Jr., Esquire (Without Report)
Eugene J. Bradley, Esquire (Without Report)
Raymond L. Hovis, Esquire (Without Report)
Michael J. Scibinico, II, Assistant Attorney General (Without Report)
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
Commonwealth of Pennsylvania

bcc w/encl:

Region I Docket Room (with concurrences)
Senior Operations Officer (w/o encls)

DPRP Section Chief

for
DPRP
Blough/meo
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Tripp
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Keimig
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