

NOTICE OF VIOLATION

Philadelphia Electric Company
Peach Bottom Units 2 and 3

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

On May 11, 1983, contractor personnel, while performing inspections as part of the fire barrier upgrade program, identified an unsealed penetration above a ventilation duct through an Emergency Switchgear Room wall. Subsequently, additional detailed inspections were performed by the licensee, and additional unsealed or improperly sealed penetrations were identified in other Emergency Switchgear Rooms, Battery Rooms, Cable Spreading and Computer Rooms, and Diesel Generator Rooms. The NRC was promptly notified and fire watches were promptly posted, as required.

The cause of the violation appears to be inadequate quality assurance of the original construction of the fire barriers. Although those barriers were not envisioned as a technical specification item, they were required by general construction specifications to be sealed. In 1978, fire barriers were incorporated as a technical specification requirement.

Surveillance inspections were performed at the required intervals since 1978, but the inspections did not identify these deficiencies. Procedural inadequacies contributed to this failure in that the procedure did not provide a complete definition of what constitutes a fire barrier, nor did it provide guidance specifying the need for "close-up" inspections.

In accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), this violation is set forth below:

Technical specification limiting condition for operation 3.14.D requires that all fire barrier penetrations in the Cable Spreading Room, Emergency Switchgear Rooms, Diesel Generator Rooms, Battery Rooms, and the Control Room be functional. Technical specification surveillance requirement 4.14.D requires visual inspection of penetration fire barriers at least once per 18 months.

Contrary to the above,

1. From February 28, 1978 until May 11, 1983, several fire barrier penetrations in the Cable Spreading Room, Emergency Switchgear Rooms, Diesel Generator Rooms, Battery Rooms, and the Control Room were not functional in that penetrations were either unsealed or not properly sealed.
2. On August 29, 1979, June 4, 1981, and September 28, 1982, inspection of penetration barriers were performed, as required by surveillance requirement 4.14.D, but the inspections were not adequate in that the unsealed or the improperly sealed penetrations were not identified. The failure to establish an adequate inspection procedure as required, contributed to this violation, as evidenced below.

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Technical Specification 6.8, Procedures, requires that written procedures be established and implemented that meet or exceed the requirements of Appendix A of Regulatory Guide 1.33 (November 1972). This Appendix requires specific procedures for each surveillance test or inspection listed in the technical specifications. FSAR Appendix D.11, Section 17.2.5 states that activities associated with implementation of the QA Program are prescribed and accomplished in accordance with appropriate instructions, procedures and drawings with appropriate acceptance criteria to assure that such activities are satisfactorily accomplished.

However, adequate procedures for visual inspections of penetration fire barriers, an activity associated with implementation of the QA program as applied to fire protection, were not established and implemented in that surveillance test procedure ST 16.7, Visual Inspection of Fire Barriers, Revisions 0 and 1, did not contain sufficient detail for performing the inspections. Specifically, the procedure did not provide a complete definition of what constitutes a fire barrier, and also did not specify that a "close-up" inspection be performed, which was needed to identify the deficiencies that existed.

This is a Severity Level IV violation (Supplement I).