

APPENDIX A
NOTICE OF VIOLATION

Philadelphia Electric Company
Peach Bottom Atomic Power Station
Units Nos. 2 and 3

Docket Nos. 50-277
50-278
License Nos. DPR-44
DPR 56

During an NRC inspection conducted from June 9, 1991, through July 8, 1991, a violation of NRC requirements with two examples 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:

10 CFR Part 50, Appendix B, Criterion XVI, Corrective Action, and the Philadelphia Electric Company Quality Assurance Plan require that measures be established to assure that conditions adverse to quality are promptly identified and corrected. In the case of a significant condition adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

1. Contrary to the above, as of July 8, 1991, the licensee had not implemented effective corrective action to resolve Q-List deficiencies. Specifically, during 1989, Corrective Action Request (CAR) Q0000300 and Nonconformance Report (NCR) P891022 identified Q-List discrepancies and omissions. The licensee's analysis and corrective actions in response to the CAR and NCR failed to identify and address the root cause for the deficiencies. As a result, deficiencies have continued to be identified.
2. Contrary to the above, as of July 3, 1991, the licensee had not effectively implemented corrective action to previous NRC violation 90-22-03 for failure to control Measuring and Test Equipment (M&TE). Specifically, M&TE utilized by the Operations organization was not stored and issued, nor were discrepancies dispositioned, in accordance with licensee Administration Procedure A-138, "Control and Use of Measuring and Test Equipment," Revision 0.

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

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. Where good cause is shown, consideration will be given to extending the response time.

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