

PHILADELPHIA ELECTRIC COMPANY

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SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

(215) 841-5001

June 7, 1984

Docket Nos. 50-277
50-578

Inspection Report Nos. 277/84-07
278/84-07

Mr. Richard W. Starostecki, Director
Division of Project and Resident Programs
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Starostecki:

Your letter of May 7, 1984, forwarded combined Inspection Report 50-277/84-07 and 50-278/84-07. Appendix A of this letter addresses one activity which did not appear to be in full compliance with NRC requirements.

Since Appendix B of the report and Philadelphia Electric Company's response contains Safeguard Information and information concerning the details of the security plans for a licensed facility, we respectfully request that Appendix B to this letter be withheld from public disclosure pursuant to the provisions of 10 CFR 2.790(a) and 10 CFR 73.21. An affidavit in support of this request is attached hereto.

The one-day delay of this response was discussed with Lowell E. Tripp of your staff and found acceptable. We regret any inconvenience this late submittal may have caused.

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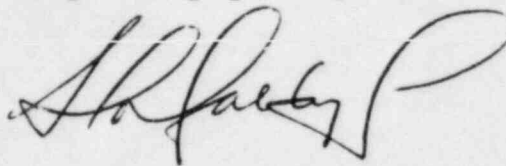
Mr. Richard W. Starostecki

June 7, 1984

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If there are any further questions, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in cursive script, appearing to read "A. R. Blough". The signature is written in dark ink and is positioned to the right of the typed name.

Attachments

cc: *A. R. Blough, Site Inspector

*Without Appendix B.

Appendix B to this letter contains Safeguards Information.

APPENDIX A

Technical Specification 6.8.1 and Regulatory Guide 1.33 (November 1972) require that written procedures be implemented for operating the Standby Gas Treatment System (SGTS). Procedure S.10.5.G, Revision 0, November 3, 1976, Manual Swap Over of Reactor Building Equipment Cell Exhaust to Standby Gas, requires the following actions outside the Control Room: (1) verification that damper 0477-1 is OPEN; and (2) carefully monitor SGTS duct pressure to ensure pressure does not go below 5 inches H₂O negative.

Contrary to the above, between December 5, 1981, and March 10, 1984, Reactor Building Equipment Cell ventilation exhaust was switched to SGTS numerous times without performance of the steps, listed above, that required action outside the Control Room.

This is a Severity Level IV Violation (Supplement I) applicable to DPR-44 and DPR-56.

Response

Procedure GP-1, "Pre-Startup Checkoff List" requires the Standby Gas Treatment (SGBT) to be prepared for automatic operation prior to plant startup. The governing procedure for SGBT automatic operation, "S.10.5.A, Set-Up of Standby Gas Treatment for Auto Operation," requires the system be set up to produce minimum SGBT flow to ensure that the duct pressure will not drop below 5 inches H₂O vacuum and jeopardize the duct integrity when Reactor Building equipment cell exhaust is swapped over to SGBT. Damper 0477-1 is a normally open, fail open ventilation damper which can close only on receipt of an isolation signal and cannot change position during normal SGBT operation. Therefore, the two procedural steps are unnecessary.

Reactor Building equipment cell exhaust is usually directed to the SGBT system to filter potentially contaminated air during reactor water cleanup demineralizer regeneration. With the SGBT system already setup for automatic operation, the two steps identified in the inspection report have been completed and need not be repeated. In 1981, a revision to the governing procedure for SGBT automatic operation to delete the two unnecessary actions: (1) verification that damper 0477-1 is open, and (2) carefully monitor SGTS duct pressure to ensure that the duct pressure does not drop below 5 inches H₂O vacuum, was initiated but apparently never reviewed, revised, nor issued.

It appears that the operating forces, believing that the revision was in progress, continued to perform this procedure without executing these two unnecessary actions. Upon notification by the inspector, procedure S.10.5.G was promptly revised to delete these steps. The new revision was approved and is currently in use. It will be emphasized in shift meetings that procedures must be followed, that temporary changes to procedures must be initiated in those cases when the procedure is inappropriate, and that permanent procedure revisions should be initiated promptly for cases of this nature.

APPENDIX B

THIS PAGE, CONTAINING SAFEGUARDS INFORMATION,
NOT FOR PUBLIC DISCLOSURE, IS INTENTIONALLY
LEFT BLANK.

COMMONWEALTH OF PENNSYLVANIA :
: SS.
COUNTY OF PHILADELPHIA :

S. L. Daltroff, being first duly sworn, deposes and states as follows:

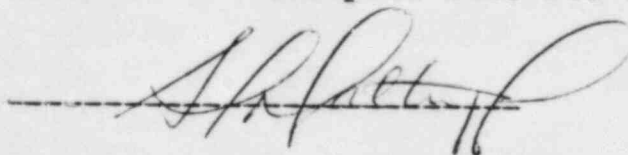
1. He is Vice President of Philadelphia Electric Company (hereinafter referred to as the "Company"); he is authorized to execute this Affidavit on behalf of the Company; and he has read Appendix B to the foregoing letter to the United States Nuclear Regulatory Commission, Office of Inspection and Enforcement, containing the Company's response to Inspection Report Number 50-277/84-07 and 50-278/84-07 (hereinafter referred to as "the Response"), and knows the contents thereof; and the statements and matters set forth in the Response are true and correct to the best of his knowledge, information and belief.

2. Appendix B to the Response which is sought to be withheld from public disclosure, contains Safeguards Information and details of the physical security plans for Peach Bottom Atomic Power Station.

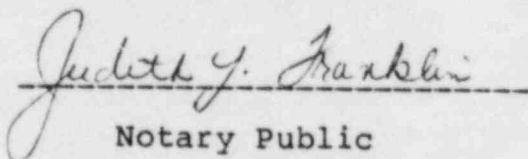
3. To the best of his knowledge, information and belief, the information set forth in Appendix B has been treated as Safeguards Information and confidential and proprietary information and has been withheld from public disclosure by the Company in accordance with the Company's practice of treating all

information dealing with the details of security procedures as confidential and proprietary information.

4. Appendix B to the Response should be considered by the Nuclear Regulatory Commission as confidential and proprietary information and be withheld from public disclosure on the grounds that it contains Safeguard Information and details of the physical security plans of a licensed facility, such disclosure is not required in the public interest, and such disclosure would adversely affect the interest of Philadelphia Electric Company.

A handwritten signature in cursive script, appearing to read "A. R. [unclear]", written over a horizontal dashed line.

Subscribed and sworn to
before me this 7TH day
of JUNE, 1984

A handwritten signature in cursive script, reading "Judith Y. Franklin", written over a horizontal dashed line.

Notary Public

JUDITH Y. FRANKLIN
Notary Public, Phila., Phila. Co.
My Commission Expires July 28, 1987