

APPENDIX A

NOTICE OF VIOLATION

Philadelphia Electric Company
Peach Bottom Units 2 & 3

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

As a result of the inspection conducted on May 14-18, 1984, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

1. 10 CFR 50, Appendix B, Criterion XVI, "Corrective Action" requires that measures be established to assure that conditions adverse to quality are promptly identified and corrected and in the case of significant conditions adverse to quality, the measures are required to assure that the corrective action precludes repetition.

Peach Bottom Quality Assurance Plan, Volume III, Program Section, Paragraph 16.1, "Corrective Action" states, in part, that "measures be established to assure that conditions adverse to quality are promptly identified and corrected." PECO defines conditions adverse to quality as "...nonconformances to specified requirements."

Contrary to the above, as of May 18, 1984, nonconformances had not been corrected that had been identified in Quality Assurance Audit Report AP83-40PR dated January 26, 1984, and previously in nonconformance report NCR A82-37-01 dated December 15, 1982, regarding failure to review maintenance administrative procedures at the prescribed periodicity.

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

2. 10 CFR 50, Appendix B, Criterion XI, "Test Control" requires that measures be established to assure that testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is performed in accordance with written test procedures which incorporate the requirements and acceptance limits.

Peach Bottom Quality Assurance Plan, Volume III, Program Section, Paragraph 11.1 states, in part, that testing shall be performed in accordance with written test procedures which incorporate or reference acceptance limits contained in design documents. The Activities Section of that Plan, Paragraph 11.4 states that procedures shall be designed to permit evaluation of the system's or component's performance.

Contrary to the above, Surveillance Test Procedures ST 12.15.1-3, ST 12.15.3-3 and ST 12.15.4-3 which partially implement Technical Specification 6.14, which requires a program to reduce leakage of potentially highly radioactive

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fluids from systems outside containment, contain neither acceptance criteria nor the data on which the evaluation of the system's or component's performance can be evaluated.

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

Pursuant to the provisions of 10 CFR 2.201, Philadelphia Electric Company is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) 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 this response time.