

PHILADELPHIA ELECTRIC COMPANY

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SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

July 13, 1984

Docket Nos. 50-277
50-278

Inspection Report Nos. 50-277/84-16
50-278/84-14

Mr. Thomas T. Martin, Director
Division of Engineering and Technical Programs
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Martin:

Your letter of June 15, 1984 forwarded combined Inspection Report 50-277/84-16 and 50-278/84-14. Appendix A of your letter addresses one activity which does not appear to be in full compliance with Nuclear Regulatory Commission requirements. This item is restated below along with our response.

Appendix "A" to License Nos. DPR-44 and DPR-56, Technical Specifications Section 6.11, requires that procedures for personnel radiation protection shall be approved, maintained and adhered to for all operations.

Contrary to the above, written procedures were not approved and maintained for operation of the whole-body counting systems. The moving bed system and associated software was placed in service on February 10, 1984 and the stand-up system and associated software was placed in service on May 7, 1984.

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

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Response

This violation was the result of a delay in incorporating the revised operating procedures for the moving bed system (Canberra Accuscan Whole Body Counter) into the station written procedures and a delay in incorporating the vendor supplied operating procedures for the stand-up system (Canberra Fastscan Whole Body Counter) into the station written procedures.

Modifications of the Canberra Accuscan Whole Body Counter included installation of a new computer system. This new computer system required retraining of our Health Physics personnel by the vendor prior to operation of the system. This training utilized the vendor supplied document, "Canberra Accuscan Whole Body Counter Operator's Manual." After this modified moving bed system was put into service, personnel continued to use this vendor document to operate this system.

The new stand-up system (Canberra Fastscan Whole Body Counter) also required training of our Health Physics personnel by the vendor prior to operation of the system. This training utilized the vendor supplied document "Canberra Fastscan Whole Body Counter Operator's Manual." After this stand-up system was put into service, personnel continued to operate this system utilizing this vendor document.

The immediate action taken by Philadelphia Electric Company following notification of this violation was the verification that our operators had been correctly trained by vendor personnel using vendor procedures. Philadelphia Electric Company has since prepared station procedures. These station procedures were approved by the Plant Operation Review Committee on July 11, 1984. As a further corrective action, the Dosimetry Supervisor has been counseled that approved station procedures are required prior to the operation of modified equipment.

To prevent recurrence, Peach Bottom plant management, by letter, has emphasized to the Health Physics and Chemistry Staff that a new or modified system may not be placed in service without a Plant Operation Review Committee approved Philadelphia Electric Company procedure for that system.

Mr. Thomas T. Martin

July 13, 1984

Page 3

Should you require additional information, please do not
hesitate to contact us.

Very truly yours,

A handwritten signature in cursive script, appearing to read "A. R. Blough".

cc: A. R. Blough, Site Inspector

RECEIVED
JUL 13 1984