

APPENDIX A

NOTICE OF VIOLATION

Philadelphia Electric Co.  
Philadelphia, Pennsylvania 19101

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

As a result of the inspection conducted on May 7-11, 1984, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violation was identified:

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 shall 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 11, 1984, the licensee had not established measures to assure prompt corrective actions, for identified conditions adverse to quality, to preclude repetition as evidenced by the following:

1. The licensee's Storage Area Surveillance Reports dated March 30, 1982, July 1, 1982, September 24, 1982 and December 20, 1982 identified nonconformances in the Mechanical Outdoor Storage Area. These nonconformances included inadequate access control to storage area, inadequate identification of stored material, Q-listed piping uncapped and rusted, inadequate segregation of Q-listed items and inadequate definition of storage area. Similar nonconformances continued to exist at the time of this inspection.
2. The licensee's Engineering and Research QA Department Audit No. OP200, in July 1982, identified that a substantial number of Engineering Review Request forms (ERRFS) remained open past the due date. At the time of this inspection 250 ERRFs had not been closed, including one issued in 1976, one issued in 1981, thirty issued in 1982, 145 issued in 1983 and 73 issued in 1984.

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

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Pursuant to the provisions of 10 CFR 2.201, Philadelphia Electric Co. 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.