## APPENDIX A

## NOTICE OF VIOLATION

Philadelphia Electric Company Peach Bottom Units 2 & 3

Docket/License: 50-277/DPR-44

50-278/DPR-56

As a result of the inspection conducted on June 8 - July 15, 1984, and in accordance with the revised NRC Enforcement Policy (10 CFR 2, Appendix C), published in the Federal Register on March 8, 1984 (49 FR 8583), the following violations were identified:

A.1 Technical Specification 6.8 and Regulatory Guide 1.33 (November 1972) require implementation of written procedures for fire protection equipment. Administrative Procedure A-30, Revision 4, June 10, 1981, Plant Housekeeping Controls, states in paragraph 9, Maintenance of Fire Fighting Capabilities, that the storage of equipment and materials shall not impede access to fire-fighting equipment.

Contrary to the above, at 8:20 a.m. June 27, 1984, access to fire extinguisher 234-5 on the Unit 2 Refuel Floor was impeded by storage of material in front of the extinguisher.

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

A.2 Technical Specification 6.8.1 states that written procedures and administrative policies shall be established, implemented and maintained. Administrative Procedure A-6 prescribes the methods used to control drawings and assure that up to date drawings are used in operation activities.

Contrary to the above, drawings used in operation activities were not properly controlled including drawing M-351 which was found to be missing main steam relief valve vacuum breakers, drawing M-329 which was missing, and numerous other drawings which were found to be out of date during the time period June 27 to July 2, 1984. In addition, procedure A-6, Rev. 9, dated 12/2/83 was out of date in that numerous drawings had been updated and not included in the procedure.

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

A.3 Technical Specification 6.8.1 states that written procedures and administrative policies shall be established, implemented and maintained. Administrative Procedure A-2 prescribes the method for control, issuance, and use of documents and revisions. Paragraph 7.5.1 states that controlled copies of documents shall be distributed in accordance with the Controlled Copy Distribution Table. Changes to controlled copies shall be placed in the notebooks by the office staff unless requested otherwise by the notebook holder.

Contrary to the above, on July 2, 1984, the controlled copy of GP procedures in the Technical Support Center contained GP 2, Rev. 35 and GP-18 Rev. 2, when GP-2, Rev. 36 dated 5/18/84 and GP-18, Rev. 3 dated 12/27/83 should have been filed in the notebook.

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

Pursuant to the provisions of 10 CFR 2.201, Philadelphia Electric Company is hereby required to submit to this office within 30 days of the date of the letter transmitting this Notice, a written statement or explanation in reply, including for each violation: (1) the corrective steps which have been taken and the results achieved; (2) the 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 the response time.