

APPENDIX A

NOTICE OF VIOLATION

Philadelphia Electric Company
Peach Bottom Atomic Power Station
Unit No. 2

Docket No. 50-277
License No. DPR-44

As a result of the inspection conducted on June 18-21, 1984, and in accordance with the 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. Technical Specification 6.4, "Training", requires, in part, training program for the facility staff meeting the requirements of Section 5.5 of ANSI N18.1-1971. Section 5.5 of ANSI N18.1 requires, in part, special training sessions for replacement personnel. A training program shall be established which maintains the proficiency of the operating organization by periodic training exercises, instruction periods and special training sessions.

Contrary to these requirements, licensee's Procedure No. HPO/CO-80, used to train and qualify contractor-supplied Health Physics Technicians assigned to pipe replacement, did not include four approved radiation exposure control procedures developed specifically for pipe replacement. These Health Physics Technicians were responsible for implementing these radiation exposure control procedures.

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

- B. Technical Specification 6.11, "Radiation Protection Program," requires, in part, adherence to procedures for personnel radiation protection. Licensee's Procedure No. HPO/CO-4 requires, in part, a radiation work permit containing specific requirements for radiological exposure controls.

Contrary to the above, on several occasions during May and June 1984, Radiation Work Permit No. 2-94-0290, "Unit 2 Drywell, Pre-Decon Work," was used for the removal of hydraulic snubbers by contractor personnel and did not provide specific radiological exposure controls.

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

Pursuant to the provisions of 10 CFR 2.201, Philadelphia Electric Company is hereby required to submit to this office with 30 days of the date of the letter transmitting this Notice, a written statement or explanation in reply, including for these violations: (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.

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