

APPENDIX A
NOTICE OF VIOLATION

Philadelphia Electric Company
Peach Bottom Atomic Power Station Units 2 and 3
Delta, PA

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

During an NRC inspection conducted on February 25 through March 30, 1992, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1992), the violation is listed below:

Technical Specification 6.8.1 requires that written procedures shall be established and implemented that meet the requirements of Sections 5.1 of ANSI N18.7-1972. Section 5.1 requires establishment of procedures to control the scheduling of testing and states that procedures shall be followed. Administrative Procedure A-127, Revision 1, "Inservice Testing," provides for the implementation of the second ten year interval Inservice Testing (IST) Program at Peach Bottom. Procedure A-127, Step 7.10.1.1, states that if a pump is found to be in the "Alert" range per surveillance test procedure criteria, subsequent tests for that pump shall be scheduled at least once every six weeks. This testing frequency shall continue until corrective action has been taken and the pump has been tested to verify that it is operating acceptably.

Contrary to the above, three examples of the licensee's failure to implement the requirements of A-127 involving increased testing frequency were identified:

1. On June 14, 1991, the 'A' emergency service water (ESW) pump went into the "Alert" range for high vibration during conduct of IST surveillance test ST-O-033-300-2, "ESW, ESW Booster, Emergency Cooling Water (ECW), Pump, Valve and Unit Cooler Fans Functional Inservice Test," Revision 0. The next performance of the test was due on July 26, 1991, with a grace date of August 5, 1991. The licensee did not perform the test until September 13, 1991.
2. Following the performance of IST testing for the 'A' ESW pump per ST-O-033-300-2 on September 13, 1991, the next performance of the test was due on October 25, 1991, with a grace date of November 4, 1991. The licensee did not perform the test until November 6, 1991.
3. On January 9, 1992, the Unit 2 'B' and 'D' high pressure service water (HPSW) pumps went into the "Alert" range for low differential pressure during conduct of ST-O-032-301-2, "HPSW Pump, Valve and Flow Functional and Inservice Test," Revision 1. The next performance of the test was due on February 20, 1992, with a grace date of March 1, 1992. The licensee did not perform the test until March 6, 1992.

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

Pursuant to the provisions of 10 CFR 2.201, Philadelphia Electric Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region I, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of receipt of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.