



PECO ENERGY

Gerald R. Rainey
Vice President
Peach Bottom Atomic Power Station

PECO Energy Company
RD 1, Box 208
Delta, PA 17314-9739
717 456 7014

January 3, 1996

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

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Subject: Peach Bottom Atomic Power Station Units 2 & 3 Corrective Steps that will be (or have been) taken to avoid further violations. (Combined Inspection Report Nos. 50-277/95-23 & 50-278/95-23 and Notice of Violation - Reply) dated December 5, 1995.

Reference: (1) NRC Combined Inspection Report Nos. 50-277/95-23; 50-278/95-23 and Notice of Violation dated September 22, 1995.

(2) Peach Bottom Atomic Power Station Units 2 & 3
Response to Notice of Violation (Combined Inspection Report No. 50-277/95-23 & 50-278/95-23) dated November 2, 1995.

(3) NRC Combined Inspection Report Nos. 50-277/95-23; 50-278/95-23 and Notice of Violation - Reply dated December 5, 1995.

Gentlemen:

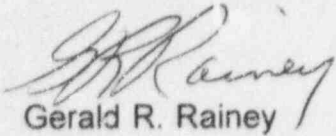
In response to your letter dated December 5, 1995, which transmitted your reply to the PECO Energy response concerning the Notice of Violation and referenced inspection report, we submit the corrective steps that will be (or have been) taken to avoid further violations. A Performance Enhancement Process (PEP) investigation was performed and the results of the investigation were stated in the original response as the reasons for the incident. We feel that the corrective actions taken as a result of the PEP investigation and the corrective actions taken as a result of the Hot Shop Quality Improvement Team, which are outlined in this response, will avoid further violations.

9601110202 960103
PDR ADOCK 05000277
G PDR

CCN #96-14002

JED

If you have any questions or desire additional information, do not hesitate to contact us.



Gerald R. Rainey
Vice President
Peach Bottom Atomic Power Station

Attachment

cc: B. W. Gorman, Public Service Electric & Gas
R. R. Janati, Commonwealth of Pennsylvania
T. T. Martin, US NRC, Administrator, Region I
W. L. Schmidt, US NRC, Senior Resident Inspector
H. C. Schwemm, VP - Atlantic Electric
R. I. McLean, State of Maryland
A. F. Kirby III, DelMarVa Power

The Corrective Steps that Will Be (or Have Been) Taken to Avoid Further Violations

General work instructions were issued to Radwaste Decontamination (Decon) Shop Personnel by the Radwaste Decon Supervisor on August 31, 1995, as a result of this incident. This letter stated instructions/ expectations that must be followed in order to ensure that the highest standard of radiological protection and rad worker practices are maintained. Personnel were instructed to ensure all contaminated equipment/tools arriving at the decon area were properly labelled with radiation and contamination levels noted on the rad sticker. Additionally, bags or containers with indicated dose rates equal to or greater than 100 millirem per hour or contamination levels equal to or greater than 50,000 disintegrations per minute (dpm) per 100 square centimeters (cm) are not to be opened without Health Physics (HP) personnel present. Personnel were instructed not to disassemble any equipment (ie. pumps, valves, tools, etc.) or begin work on any "new" evolutions until HP personnel are present or notified of the job scope. All advanced radworker (ARW) tasks performed are to be documented. Personnel were instructed to notify HP Supervision for guidance if at any time (they) are unsure about radiological conditions or job scope.

A Hot Shop Quality Improvement Team was formed to perform an evaluation of the work process in the Hot Shop. This team was composed of personnel from Maintenance, Radwaste and Health Physics departments. The corrective actions developed by this team have been completed and will avoid further violations. These actions included:

A specific Maintenance Hot Shop Radiation Work Permit (RWP) was created and implemented September 14, 1995. The RWP provides a mechanism for HP personnel to continually be informed of work activities that could create increased radiological hazards to workers in the Hot Shop. The special instructions/ remarks section of the RWP requires:

- Knowledge of the work area radiological conditions.
- HP briefing for work on contaminated material and High radiation area entries
- HEPA ventilation required to work with material greater than 50,000 dpm/ 100 square cm or per HP instruction. For HEPA use, set up per HP instruction.
- Prior HP notification required for any work involving welding, burning, grinding, flapping, wire brushing, machining, or parts/ component disassembly. Discuss the work evolution with HP prior to start.
- Items greater than or equal to 1000 mr/hr at contact must have approval from the Radiation Protection Manager prior to transport to the Hot Shop.
- Hand Dosimetry to be worn by HP personnel.

A Hot Shop Radioactive Materials Receipt/ Decon Log was created and implemented to ensure contaminated items taken to the Hot Shop are properly controlled and documented. The special instructions/ remarks section of the Hot Shop RWP also requires that contaminated items be logged in the Hot Shop Receipt Log.

A generic Hot Shop Work Order Activity was created and is to be used by planning personnel whenever field components or equipment are to be worked in the Maintenance Hot Shop per a Work Order. The main purpose for using work order activity documentation is to improve Hot Shop work controls by assigning specific radiological controls on the work order activity. This also allows HP review of the activity weeks prior to the actual performance of the activity.

First line supervisors were assigned areas within the Hot Shop to improve housekeeping and ownership. This will help to ensure that appropriate personnel are aware of work activities and that work is performed in a controlled and prescribed manner.

A High Internal Contamination Tag was created for items that contain high internal contamination. This tag clearly states that HP personnel must be notified prior to handling the contaminated item.

HP identification stickers were instituted for HP hardhats to ensure clear identification of HP Technicians. The distinction between HP Technicians and ARWs was re-communicated to site personnel in all-hands meetings, continuing training and by site wide publications. These actions should effectively address the correct identification of HP personnel in the field.

The Hot Shop Quality Improvement Team investigation and analysis (and PEP investigation) did not identify any programmatic concerns with the ARW program or the control of contractors as root causes of this event. These areas, however, will continue to be closely monitored by station supervision and management.