



PEACH BOTTOM--THE POWER OF EXCELLENCE

PHILADELPHIA ELECTRIC COMPANY

PEACH BOTTOM ATOMIC POWER STATION

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D. B. Miller, Jr.
Vice President

May 22, 1992

Docket Nos. 50-277
50-278

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

SUBJECT: Peach Bottom Atomic Power Station - Units 2 & 3
Response to Notice of Violation 92-07-03 (Unit 2 and 3)
(Combined Inspection Report Nos. 50-277/92-07; 50-278/92-07)

Dear Sir:

In response to your letter dated April 16, 1992, which transmitted the Notice of Violation in the referenced inspection report, we submit the attached response. The subject inspection concerns a routine residents' safety inspection that was conducted from February 25 through March 30, 1992.

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

Sincerely,

- cc: R. A. Burricelli, Public Service Electric & Gas
- T. M. Gerusky, Commonwealth of Pennsylvania
- J. J. Lyash, USNRC Senior Resident Inspector
- T. T. Martin, Administrator, Region I, USNRC
- H. C. Schwemm, Atlantic Electric
- R. I. McLean, State of Maryland
- C. D. Schaefer, Delmarva Power

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J. T. Robb	51A-13, Chesterbrook
D. M. Smith	52C-7, Chesterbrook

RESPONSE TO NOTICE OF VIOLATION 92-07-03

Restatement of Violation

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-0-033-300-2, "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 Si-0-033-300-2 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-0-032-301-2, "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 I).

Reason for the Violation

Administrative Procedure A-127 directs the IST Coordinator to notify the ST Coordinator to schedule a pump test at least once every six weeks for a pump in the 'Alert' range. The procedure requires that a Special Testing Request form be submitted to the ST Coordinator for scheduling increased frequency testing in the Surveillance Testing and Reporting System (STARS) until the problem is corrected. In the case of the 'A' ESW pump, the Special Testing Request was submitted too late for the STARS process to schedule the increased frequency test. As a result, the testing program barriers were bypassed and the frequency required by A-127 was exceeded. Attempts were made to perform the test on July 26, 1991, and August 2, 1991, but due to low ESW booster pump suction pressure the tests were aborted. This testing occurred simultaneously with troubleshooting and testing activities associated with the ESW system. Efforts to resolve ESW system deficiencies and the lack of management awareness of the increased frequency testing requirement contributed to the unsuccessful completion of the pump testing within the required increased frequency time allowance. The test was completed on September 13, 1991.

The second event where A-127 increased testing requirements were exceeded was the result of the inappropriate use of Administration Procedure A-43.2, Revision 2, "Surveillance Test Schedule Non-conformance Report," to allow extension of test performance beyond the end of the IST grace allowance. The non-conformance report identified the 'B' ESW pump out of service for maintenance which prevented the full test from being initiated. A partial test could have been performed on the 'A' ESW pump to satisfy IST requirements, but this was not recognized by the Operations Cognizant Engineer. Operations initiated the non-conformance report and inappropriately determined that since the test was last completed September 13, 1991, the next performance of testing could be deferred without any adverse consequences of IST requirements. Upon review of the nonconformance report, the ST Coordinator thought that Operation's management was aware of the testing requirements and therefore did not question the justification for the non-conformance report. The test was later performed November 6, 1991.

The third event had the same cause as found in the first event. The IST Coordinator did not submit a Special Testing Request to the ST Coordinator to increase the frequency of testing on the Unit 2 'B' and 'D' HPSW pumps. A Special Testing Request was not submitted because the IST Coordinator expected a quick resolution to the suspected problem that put the pumps in the "Alert" range and he thought that the problem could be resolved before a retest was required. Based on this expectation, the Special Testing Request was not submitted to the ST Coordinator and was not entered into STARS. Had the Special Testing Request been submitted, the quarterly IST Surveillance Test would have been performed in lieu of a Tech Spec required monthly surveillance that was performed on February 22, 1992. In addition, mis-communications between the IST Coordinator, Operations' Cognizant Engineer, System Manager and Back-up System Manager also contributed to this event. The test was completed on March 6, 1992.

Corrective Steps that have been taken and the Results Achieved

The event was discussed with appropriate personnel. The IST Coordinator was coached regarding procedural compliance and the need for scheduling accelerated frequency testing in STARS. The IST Coordinator was also coached that scheduling is required regardless of troubleshooting or retest activities that might be underway.

Corrective Steps that will be taken to Avoid Further Violations

Administrative Procedure A-127 will be revised to clarify that components tested in the 'Alert' range should have accelerated testing scheduled immediately. An action evaluation will be initiated using PIMS to schedule the accelerated testing in place of the current 'Special Testing Request' found in A-127. Additionally, A-127 will be revised to incorporate the actual code requirements for accelerated frequency testing. Review and revision of A-127 will be completed by July 30, 1992.

The Technical Staff training program for ISI/IST will be revised to include the relationship between Technical Specifications, IST, and system operability. Special emphasis will be given to understanding the impact of test results and how the system may be affected. This information will be presented as a part of continuing training program by June 30, 1992.

A revision to AG-49, "Surveillance Testing System" will be made that requires the ST Coordinator to confer with the IST Coordinator to ensure adherence to IST Program requirements, when an A-43-3, "Out of Surveillance Authorization Form" is submitted for IST tests, regardless of the level of previous review indicated on the form. Revision of the guideline will be completed by June 30, 1992.

Date of Full Compliance

Full compliance was achieved September 13, 1991 and November 6, 1991, for the 'A' ESW pump and March 6, 1992, for the Unit 2 'B' and 'D' HPSW pumps when increased frequency testing was performed.