

APPENDIX A  
NOTICE OF VIOLATION

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

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

During an NRC inspection conducted on June 9 through July 27, 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 be established and implemented that meet the requirements of Section 5.3 of ANSI N18.7-1972. ANSI N18.7-1972, Section 5.3, requires that nuclear plants be operated in accordance with written procedures that provide an approved preplanned method of conducting operations. PECO Operations Manual Section 9, "Procedures and Operator Aids," directs operators to perform actions and carry out responsibilities in accordance with the approved Operating Procedure applicable to the tasks.

Contrary to the above, on July 27, 1992, control room operators conducted activities without the use of written procedures establishing an approved method of conducting the operation. Specifically, operators aligned the Unit 2 reactor water clean-up (RWCU) system in a configuration not in accordance with that written and approved in System Operating Procedure SO 12.1.A-2, "Reactor Water Cleanup System Startup for Normal Operations or Reactor Vessel Level Control," Revision 7. The system was aligned with three pumps in service and the demineralizer bypass valve partially open, although not provided for in SO 12.1.A-2. Operation in this alignment caused an engineered safeguards features isolation due to high RWCU flow.

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

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. 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.