



PECO ENERGY

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March 28, 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 - Change to a Violation Response Commitment

References: (1) NRC Combined Inspection Report Nos. 50-277/95-26; 50-278/95-26 and Notice of Violation dated December 12, 1995.

(2) Peach Bottom Atomic Power Station Units 2 & 3 Response to Notice of Violation (Combined Inspection Report No. 50-277/95-26 & 50-278/95-26) dated January 19, 1996.

Gentlemen:

In response to your letter dated December 12, 1995, which transmitted a Notice of Violation concerning the referenced inspection report, we submitted a response on January 19, 1996, with corrective steps that had been and will be taken to avoid further violations. During the implementation of our corrective actions, however, it was determined that a revision to Operations Manual (OM)-C-10.5 as previously reported to you would not be required since the guidance to be added was contained in other documentation.

We stated in the referenced response letter that OM-C-10.5 would be revised to verify that the control room Supervisor performs an adequate review of post modification testing (PMT) for operability, specifically when the PMT concerned a design change of a Technical Specification system. We also stated that the OM would be revised to ensure that the PMT verifies positive automatic operation of the system or component utilizing actual plant parameters.

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Upon further review, however, we have determined that the appropriate guidance is contained in OM-P-15.1, Administrative Guideline (AG)-26.12 "PIMS Work Order Processing", Revision 9, and AG-CG-26.6 "Post Maintenance/Modification Testing (PMT)", Revision 2. This guidance was not properly implemented during the work activities associated with this event.

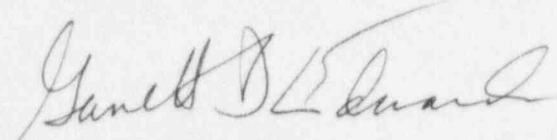
OM-P-15.1, revision 3, Section 4.0 addresses operability reviews. It states that the scope of an operability determination needs to be sufficient to address the capability of the equipment to perform its safety function(s). The full scope of the current licensing basis should be examined to establish the conditions and performance requirements to be met for determining operability. The basis for declaring an affected system operable can be determined through analysis, test or partial test, operating experience and engineering judgement. It is required that all safety control functions (auto start, trip, isolation, transfer, etc.) and the instruments and controls required for them to function as designed be considered.

AG-26.12 states in section 5.5.6, Equipment Return to Service - Shift Supervision (SSV) Acceptance, step 2, that Shift Management is ultimately responsible for returning equipment to service. Shift Management is required to verify the adequacy of the PMT activities, considering the reported problem, work performed and clearance effects.

The purpose of AG-CG-026.6 is to provide criteria for the selection and documentation of the PMT program and to provide assurance that equipment performs its intended function when returned to service following maintenance activities, the original deficiency is corrected and that a new deficiency has not been created. The guideline states in section 7.2.3, Use of Procedures for PMTs, procedures or test instructions should be as specific as possible and should avoid using vague criteria such as "verify proper operation" or "check for excessive temperature". The expectation is that clear acceptance criteria be utilized. In addition, section 7.3.1, Scope of the Program states that the scope of PMT is based on (the) extent of modification performed. Test(s) should be conducted under conditions that represent design operating parameters, such as flow, differential pressure, temperature, input signal values and fluid types where practical.

The procedural guidance noted above for activities associated with this event will be communicated and reinforced to appropriate personnel by April 26, 1996, to heighten worker awareness of proper future action(s).

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



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