



PEACH BOTTOM--THE POWER OF EXCELLENCE

**PHILADELPHIA ELECTRIC COMPANY**

PEACH BOTTOM ATOMIC POWER STATION  
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(717) 456-7014

D. B. Miller, Jr.  
Vice President

September 11, 1992

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

SUBJECT: Peach Bottom Atomic Power Station - Units 2 and 3  
Response to Notice of Violation 92-13-02 (Unit 3)  
(Combined Inspection Report Nos. 50-277/92-13; 50-278/92-13)

Dear Sir:

In response to your letter dated August 6, 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 June 9 through July 27, 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 1, USNRC
- H. C. Schwemm, Atlantic Electric
- R. I. McLean, State of Maryland
- C. D. Schaefer, Delmarva Power

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bcc: J. W. Austin	A4-4N, Peach Bottom
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G. R. Rainey	51A-11, Chesterbrook
J. T. Robb	51A-13, Chesterbrook
D. M. Smith	52C-7, Chesterbrook

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RESPONSE TO NOTICE OF VIOLATION 92-13-02

Restatement of Violation

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 1).

Reason for the Violation

Operating Procedure SO 12.1.A.2, "Reactor Water Cleanup System Startup for Normal Operations on Reactor Vessel Level Control," provides direction for the startup and operation of the RWCU system. On July 27, 1992, three RWCU pumps were placed into service and the RWCU demineralizer byass valve was throttled open in an effort to reduce the reactor pressure vessel dome-bottom head drain differential temperature to allow restart of the 2B recirculation pump. The system alignment for this activity and the simultaneous operation of three RWCU pumps was not an approved method of operation described in the procedure. This activity resulted in the actuation of the primary containment isolation system (PCIS) as a result of RWCU high flow.

Corrective Steps That Have Been Taken and Results Achieved

The Shift Operations Manager issued a letter to the Shift Managers and Shift Supervisors that discussed managements' expectations concerning procedure usage. This letter contained a discussion of the importance for proper procedural adherence, and the need to submit procedure requests for activities not contained in a procedure and for procedure improvements. Applicable governing documents that require procedure usage were also included with this letter. Additionally, Operations Management met with each operating shift to emphasize the need to perform activities and evaluations by procedure.

Section 9 of the Operations Manual was revised and approved on August 27, 1992, to provide direction for Operations personnel with respect to actions to be taken in the absence of a procedure.

Corrective Actions That Will Be Taken to Avoid future Violations

Licensed and non-licensed Operations personnel have been surveyed to help identify if any additional evolutions or actions are performed without written procedures. The evolutions identified as a result of this survey will be evaluated and necessary procedures will be written. These actions will be completed by December 31, 1992.

Date When Full Compliance Was Achieved

Full compliance was achieved July 27, 1992, after the RWCU high flow isolation was reset and the RWCU system was returned to a pre-established mode of operation described in procedure SO 12.1.A.2.