

APPENDIX A

NOTICE OF VIOLATION

Philadelphia Electric Company
Peach Bottom Atomic Power Station, Unit 2

Docket No. 50-277
License No. DPR-44

As a result of the inspection conducted on July 16 - 27, 1984, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violation was identified:

10 CFR 50, Appendix B, Criterion II, Quality Assurance Program, requires that the program provide for indoctrination and training of personnel as necessary to assure that suitable proficiency is achieved and maintained. Section 2.2. of the licensee's Quality Assurance Plan, Volume I, Revision 7, December 21, 1983, in conjunction with FSAR, Appendix D (17.2B) and ANSI N45.2.6-1978, requires QC inspectors to be (1) medically examined once per year and (2) re-evaluated for qualification in cases where they have not performed inspection activities within the past year. Licensee procedure CD10.1, Revision 3, February 4, 1984, Procedure for Certification of QC Inspectors, requires yearly recertifications, which include medical examinations and supervisory evaluation of all QC inspectors.

Contrary to the above, as of July 17, 1984, recertifications have not been completed within the past year for one active QC inspector and one qualified inspector who had been inactive for over one year.

This is a Severity Level V Violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, Philadelphia Electric Company is hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved.

Where good cause is shown, consideration will be given to extending this response time.

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APPENDIX B

LICENSEE STRENGTHS

The inspection team noted specific features of the licensee's programs/activities which have been characterized as strengths. A strength is a positive attribute or feature which exceeds regulatory requirements, or an innovative feature, which contributes to the safety or effectiveness of plant activities. References are to paragraphs in Inspection Report 50-277/84-22.

1. The pipe replacement project management personnel are actively involved in the execution of the project.
 - PECO conducts daily outage meetings and biweekly Project Review Meetings (para 5.3.8).
 - CB&I Site Management is intimately involved in the day-to-day program activities (para 3.4.2).
2. A significant number of the Quality Assurance provisions implemented on the project exceed requirements.
 - PECO added more conservative requirements to CB&I's ASME approved QA program (para 6.4.2).
 - PECO QA conducts real time surveillances and monitoring of on-going site activities (para 6.4.5).
 - PECO QA audits vendors of major contractors who supply safety related equipment in addition to those audits conducted by the major contractors (para 6.4.3).
 - QC receipt inspections are more extensive than the minimum required by specification (para 7.2).
 - Material specifications exceed the requirements of applicable industry codes and standards (para 7.1).
3. The project controls applied to welding exceed those normally encountered on this type of a project.
 - PECO required the remote welding machine operators to be qualified to ASME Section IX (para 6.4.2).
 - Project controls require photo identification of welders to preclude the use of unauthorized welders at work locations (para 6.4.4).
 - Nondestructive examination results must be evaluated by SNT-TC-1A Level II or III examiners (para 6.4.2).

APPENDIX C

LICENSEE WEAKNESSES

The inspection team has identified items of concern which have been characterized as weaknesses. An item of weakness does not constitute noncompliance with regulatory requirements, rather it is related to effectiveness of a program, activity or organization. References are to paragraphs in Inspection Report 50-277/84-22.

1. Procurement controls/interfaces exhibited a weakness in that:
 - GE specifications were used for procurement prior to obtaining PECO approval (para 7.1).
 - The Project Interface Procedures Manual was not issued on a timely basis (para 7.1).
2. Housekeeping in the containment area fluctuated widely. Several unacceptable conditions related to trash accumulation and tool control were noted during the inspection (para 6.4.1).
3. A timely safety review was not completed for the temporary radioactive waste processing system and was not processed through the Plant Operation Review Committee for approval (para 4.3.2).
4. A major concern of the staff was the provisions made by PECO to assure that all plant systems and components that could be impacted by the pipe replacement program were reviewed for configuration and/or damage prior to restart. The project plan does not provide for a final walk down as-built review of the containment areas upon completion of the pipe replacements to assure all damaged equipment is identified and repaired (para 8.4).