

APPENDIX A  
NOTICE OF VIOLATION

Philadelphia Electric Company  
Peach Bottom Units 2 and 3

Docket/License 50-277/DPR-44  
50-278/DPR-56

As a result of the inspection conducted on October 16-18, 1984, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violation was identified:

Technical Specification 6.8 requires implementing the recommendations of ANSI N18.7. Section 5.3 of ANSI N18.7 (1972) requires procedures for implementing the emergency plan actions. Administrative Procedure A-21, Revision 5, April 20, 1981, Generation of Emergency Plan Procedures, requires procedures to include necessary action levels.

Contrary to the above, from about October 12, 1984 to about 5:00 p.m., October 16, 1984, Emergency Plan Implementing Procedure EP-101, Revision 9, dated October 12, 1984, Classification of Emergencies, was inadequate in that the procedure specified emergency action levels for the reactor building ventilation and main stack radiation monitors that were in three instances above full scale for the instruments; and the emergency action levels for the ventilation stack high range radiation monitor were apparently incorrect, as the value specified for an Alert was below the normal background reading. Also, procedure EP-101, Revision 8, effective from January 10, to October 12, 1984, contained one instance where a specified action level for the reactor building ventilation stack was above full scale for the instrument. This is a Severity Level IV Violation (Supplement I) applicable to DPR-44 and DPR-56.

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 the letter which transmitted 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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