APPENDIX A

NOTICE OF VIOLATION

Philadelphia Electric Company
Peach Bottom Unit 3

Docket No. 50-278
License No. DPR-56

As a result of the inspection conducted on July 16 - August 31, 1984, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violation was identified:

A.   10 CFR 50.59 allows licensees to make changes in the facility as described in the safety analysis report (SAR) without prior Commission approval, unless the proposed change involves a revision to the Technical Specifications or an unreviewed safety question. Further, licensees shall maintain records of changes in the facility as described in the SAR, including for each change a written safety evaluation which provides the bases for the determination that the change does not involve an unreviewed safety question.

FSAR Section 4.8.6 states that during the Low Pressure Coolant Injection mode of operation of the Residual Heat Removal (RHR) System, a bypass line to the suppression pool is provided so that the pumps are not damaged by operating with the discharge valves shut.

Contrary to the above, on April 27, 1982, and on June 22-25, 1984, the minimum flow bypass line for an RHR pump was deactivated in the closed position with the reactor operating. The LPCI mode of RHR was considered operable, yet no written safety evaluation was maintained to provide the basis that the change did not involve an unreviewed safety question.

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