

APPENDIX B

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: STN 50-482/84-34 Construction Permit: CPPR-147

Docket: STN 50-482 Category: A2

Licensee: Kansas Gas and Electric Company (KG&E)
P. O. Box 208
Wichita, Kansas 67201

Facility Name: Wolf Creek Generating Station (WCGS)

Inspection At: WCGS site in Coffey County, Kansas

Inspection Conducted: September 24-28, and October 5, 1984

Inspectors: Blaine Muncy 12/5/84
for H. D. Chaney, Radiation Specialist Date

Blaine Muncy 12/5/84
for E. H. Markee, Jr., Meteorologist, Meteorology and Date
Effluent Treatment Branch

Approved: Blaine Muncy 12/5/84
B. Murray, Chief, Facilities Radiological Date
Protection Section

L. Martin 1/1/85
L. Martin, Chief, Project Section A, Date
Reactor Project Branch 2

Inspection Summary

Inspection Conducted September 24-28, and October 5, 1984 (Report STN 50-482/84-34)

Areas Inspected: Routine, announced inspection of the licensee's radiation protection (RP) program, TMI action items (NUREG 0737), and selected RP

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associated emergency preparedness activities. The inspection involved 54 inspector-hours onsite and 16 inspector-hours in the regional office by two NRC inspectors.

Results: Within the three areas inspected, no violations were identified; however, one deviation was identified in one area (providing for meteorological data services, paragraph 3.a).

DETAILS

1. Persons Contacted

KG&E

- *P. Turner, Manager, Nuclear Training
- *G. Boyer, Superintendent, Technical Support Services
- *M. Williams, Superintendent, Regulatory, Quality and Administration Service
- *M. Nichols, Site Health Physicist
- *+O. Maynard, Licensing
- *H. Chernoff, Licensing
- *R. Hoyt, Emergency Planning (EP) Administrator
- K. Moles, Emergency Preparedness Coordinator
- *W. Lindsay, Supervisor, Quality Systems
- *C. Palmer, Supervisor, Chemistry
- *T. Morril, Supervisor, Chemistry
- *R. Logsdon, Site Chemist
- *B. Vince, Environmental Biologist
- *A. Mah, Supervisor, Training Department
- *R. Wollum, Coordinator, Instruments and Controls Group
- *M. Hawk, Computer Engineer
- J. Blair, Nuclear Services Engineer
- J. Johnson, Chief, Security
- R. Stright, Licensing
- J. McKinstry, Operations Coordinator
- T. Warner, Jr., Nuclear Systems Operator

Others

- *R. Denise, NRC Task Force Director for WCGS
- *B. Barlett, NRC Resident Inspector
- H. Bundy, NRC Resident Inspector
- *W. Allen, Consultant
- *P. White, Consultant
- A. Serratore, Consultant
- R. Farias, Consultant
- J. Nollinch, NRC Project Manager, Licensing Branch 1

*Denotes those present at the exit interview.

+Was contacted by telephone on October 5, 1984, concerning Notice of Deviation.

The NRC inspectors also contacted other KG&E personnel including administrative (ADM), engineering, health physics (HP) and EP consultants, and operations personnel.

2. Previous Inspection Findings Closed During This Inspection

(Closed) Open Item (482/8320-01): WCGS Onsite RP Organization - The licensee had revised Administrative Procedure (ADM) 03-007, "Duties and Responsibilities of HP Supervisors and Technicians," and adequately resolved the NRC's concerns regarding identification of the ALARA coordinator's duties. This item is considered closed.

(Closed) Open Item (482/8320-02): WCGS RP Staff Qualifications - The NRC's concerns regarding the amount of operating commercial nuclear power plant experience possessed by the RP staff had been adequately resolved by the licensee's written commitments (letters from G. L. Koester, KG&E, to J. E. Gagliardo, NRC, dated November 30, 1983, and March 23, 1984) to supplement the RP staff with seven experienced contractor RP technicians. These technicians will possess at least 2 years of operating commercial nuclear power plant experience. The NRC will continue to review implementation of the commitments during subsequent inspections. This item is considered closed.

(Closed) Open Item (482/8320-05): Internal Radiation Exposure Control - The licensee had issued WCGS HP Operational Procedure HPH 01-012, "internal Dose Calculations," which adequately resolved the NRC's concerns regarding a program for establishing maximum permissible concentration - hours of exposure (10 CFR 20.103) from whole body counting (direct bioassay) data. This item is considered closed.

(Closed) Open Item (482/8320-10): ALARA Program - The licensee had revised the Final Safety Analysis Report (FSAR), Section 12.1.1.1, and issued procedures for ALARA program implementation (HPH 01-022, "Pre-Job ALARA Planning," and HPH 01-023, "Post-Job ALARA Review") that adequately resolved the NRC's concerns regarding ALARA program. This item is considered closed.

(Closed) Open Item (482/8320-11): RP Instrument Calibration Program - The licensee had procured a sufficient number of RP instruments for normal, outage, and dedicated emergency preparedness purposes. Also, the licensee had implemented a suitable RP instrument calibration and daily response check program (alpha, beta, gamma, and neutron). These actions adequately resolve the NRC's concerns in this area. This item is considered closed.

(Closed) Open Item (482/8406-05): NUREG-0737, Item III.D.1.1, Integrity of Systems Outside Containment Likely to Contain Radioactive Materials - The licensee had issued Procedure ADM 01-061, "WCGS Leak Reduction of Primary Coolant Sources Outside of Containment," and several reactor system specific test procedures that appear to adequately cover the requirements of NUREG-0737. The licensee's program provides for leak reduction inspections of selected systems (chemical and volume control, residual heat removal, containment spray, safety injection, and post accident sampling system (PASS)) prior to fuel load, once between each refueling, and after opening of components in the system. The ADM procedure provides

for the formal reporting of system leakage to the shift supervisor and the site health physicist. This item is considered closed.

(Closed) Open Item (482/8406-06): NUREG-0737, Item III.D.3.3, Improved Inplant Iodine Instrumentation Nuclear Accident Conditions - The licensee had issued a radiological emergency response plan implementing procedure (EPP) 01-8.1, "Onsite Radiological Monitoring," and procured particulate, iodine, and noble gas continuous airborne radioactivity monitors and portable air samplers for inplant grab sampling (using silver zeolite cartridges) and continuous monitoring of plant areas. WCGS RP personnel have been trained on performance of iodine monitoring under reactor accident conditions. The licensee's analytical procedures provide for both laboratory isotopic and interpretative field measurements (gross iodine). This item is considered closed.

3. Previously Identified Inspection Findings That Were Not Closed During This Inspection and New Inspection Findings Identified During This Inspection

a. Items That Could Impact on Fuel Loading

Open Item (482/8320-03): RP Training - The licensee had not completed all initial training for RP technicians and had not developed and implemented necessary procedures for the administrative control of the RP technician training program. The licensee had no administrative procedures in the area of lesson plan development, testing control, instructor qualification, or training record management. The licensee is currently developing RP group administrative procedures for RP technicians and RP supervisor training. The licensee's radiation worker training program which is also assigned to the WCGS RP group is currently being provided to WCGS employees. This item remains open pending licensee actions to develop and implement administrative controls for all RP group training activities and completion of the initial training program (level A) for RP technicians.

Open Item (482/8320-06): Respiratory Protection Program - The licensee had resolved two of the NRC's concerns regarding procurement of lapel air samplers and improving the technical knowledge and experience level of personnel providing respiratory protection instruction and qualification of radiation workers. Two new areas of concern have been identified in the area of RP emergency preparedness. These are: (1) the need to procure equipment for the refilling of portable breathing air bottles, and (2) increase the accessibility and number of reserve emergency breathing air bottles at the operational support center (OSC). The licensee has approximately 16 spare air bottles at the OSC and 75 or more at a distant warehouse on site that may not be readily accessible during a reactor accident. The licensee's representatives indicated that a purchase order had been processed for purchase of a semi-mobile compressor for filling breathing air bottles.

Delivery of this compressor is expected in late December 1984. The NRC inspectors indicated that the current agreement with the city of Emporia, Kansas (40 miles distance), for refilling of breathing air bottles was inadequate since continuous dedicated use cannot be guaranteed. This item is considered open pending licensee action.

Open Item (482/8320-12): RP Facilities - The licensee's evaluation of the protective clothing, laundry, and respiratory protection equipment cleaning facilities appears to agree with the NRC's in that the facilities are inadequate for major reactor outage conditions. The licensee has developed a plan for procurement of mobile facilities to backup existing facilities during outages. The licensee had also taken control of all inplant RP facilities area and is currently completing outfitting of the facilities. These actions appear to resolve the NRC's concerns in this area. In the area of RP equipment for emergency response activities, the NRC inspectors found the emergency kits in the technical support center (TSC) and OSC satisfied the inventory specified in the Emergency Plan regarding RP equipment (air samplers, dose rate measurement instruments, EP procedures, first aid kits, electrical extension cords, protective clothing, respirators, etc.) for emergency response activities except for whole body and extremity TLDs. The licensee pointed out that the OSC is located adjacent to the WCGS dosimetry office. However, the NRC inspectors discussed the necessity of having TLDs stored in the emergency kit at the OSC to ensure that TLDs will be readily available if the OSC is relocated during an emergency situation.

The NRC inspectors noted to the licensee the need to establish a formal program for the periodic inventory of dedicated emergency equipment and provision for the timely replacement of defective or appropriated equipment. The NRC inspectors verified the operability of several pieces of equipment in the emergency kits examined. The licensee provides for the response checking of radiation detection instrumentation using small check sources stored in the kits. The licensee had, in the emergency kits, high range (50 and 1,000 R/hr) beta/gamma dose rate measuring instruments, with some equipped with extendable probes. The licensee did not have, at the OSC, communication equipment for recovery and monitoring teams dispatched from the OSC. Also, the licensee had not developed plans or agreements for use of an offsite laboratory facility in case the inplant radiochemical laboratory and counting facilities could not be occupied during a reactor accident. This item is considered open pending licensee action to:

- Provide an inventory control program for dedicated emergency equipment.
- Equip the OSC emergency kits with whole body and extremity TLDs.
- Provide dedicated communications equipment at the OSC for use by onsite and inplant response teams.
- Provide for backup offsite laboratory and analytical services during a reactor accident.

Open Item (482/8320-14): RP Program Audits and Reviews - The NRC inspectors noted that the licensee had conducted a limited audit (TE 57953-K005, dated August 6, 1984) of the RP program at WCGS. This audit was performed by the WCGS site quality assurance (QA) group in lieu of the KG&E home office radiological assessment group as discussed with the NRC and as addressed in NRC Inspection Reports 50-482/83-20 and 50-482/84-06. The NRC inspectors discussed with the licensee the apparent shortcomings of the audit, such as the technical expertise of the lone auditor and the lack of verification that all aspects of the RP program as committed to in the FSAR had been implemented. The licensee was requested to re-evaluate the completeness of the RP program audit in view of the NRC inspector's findings. This item remains open.

Open Item (482/8320-15): Ventilation System Testing - The NRC inspectors reviewed the licensee's procedure for performance of the biological shield survey (SU 7-0016) and determined it satisfied the NRC's concerns in this area. The procedure incorporates adequately the commitments of the FSAR and the recommendations of NRC Regulatory Guide (RG) 1.68 and American National Standard Institute (ANSI) 6.3.1-1980. The remaining portion of this open item concerning the testing of ventilation systems used for control and filtration of airborne radioactive contaminants in various areas of the plant remains open pending the licensee's completion of balancing, testing, and certification of each system.

Open Item (482/8406-02): NUREG-0737, Item II.F.1-1, High Range Noble Gas Effluent Monitors - The following high range noble gas monitoring systems are currently under preoperational testing and system turnover to the licensee:

- Main steam line relief valve discharge lines A, B, C, and D
- Unit ventilation system discharge

- Radioactive waste building unit ventilation discharge
- Auxiliary feed pump turbine steam exhaust discharge

The licensee had not completed surveillance and calibration procedures for these systems. Also, the NRC inspectors noted that the monitors for steam lines did not provide control room readouts in units of microcurie per cubic centimeter as required by NUREG-0737. The NRC inspectors noted to the licensee their concern that the steam line monitors (gieger-mueller type) measured activity from an expanding steam plume at the discharge pipe terminus, and due to the steam plume recoil from surrounding structures, the obtaining of a viable noble gas source term and plume model for calibration purposes would be very difficult. The NRC inspectors requested that the steam line discharge calibration and dose assessment (noble gas content of steam releases) methodology be provided to the NRC regional office for staff review. Also, the NRC inspectors noted to the licensee that it appears that sample line heat tracing on the radioactive waste (RW) and plant unit vent high range noble gas monitors does not extend close enough to the detectors to prevent recondensation of liquid in the sample stream. The licensee indicated that the heat tracing would be re-evaluated. This item is considered open pending licensee completion of systems testing, surveillance and calibration procedure issuance, providing appropriate control room readout for steam line monitors, and completing methodology and procedures for converting steam line noble gas monitors readings to release rates of noble gas as required by NUREG-0737.

Open Item (482/8406-03): NUREG-0737, Item II.F.1-2, Sampling and Analysis of Plant Effluents - The licensee will utilize a grab sample skid that is an integral part of the high range noble gas monitoring systems used for plant unit vent stack and RW building unit vent stack discharge monitors. These grab sample skids are addressed in the FSAR, Section 18. The licensee had resolved the NRC's concerns regarding testing the system's capability to obtain representative samples of particulates. This was satisfied by WCGS evaluation and acceptance of the particulate plate out/loss studies done at the Callaway Nuclear Power Station which has identical equipment and almost identical sample line layouts. The NRC inspectors were provided information that the containment purge system (located next to the grab sample skid for the plant unit vent) would be isolated during a reactor accident and, therefore, would not cause unacceptable radiation levels in the area. In addition, NUREG-0737, Item II.B.2, does not require the evaluation of outward leakage of containment radioactivity to ventilation systems in determining occupancy

factors for vital areas. The licensee references use of this grab sample system in EPP 01-7.2 for making manual radioactivity release rate determinations. This resolves the NRC's concern in these areas.

The NRC inspectors determined that the licensee's chemistry procedures (CHM 01-005 and 01-007) for change out of sample filters on the grab sample skid during post accident conditions were lacking in appropriate RP controls. The procedures do not address the possible high radiation levels that might be encountered, methods to be used in obtaining a sample by remote operation of the system, or the use of special access routes, radiation shields, and remote handling tools. The heat tracing for this system also appeared to terminate too far from the sample filters to preclude recondensing of liquids. This condition could cause wetting of filters resulting in filter damage or filling of the sample lines with liquids thus stopping sample flow. The licensee also had not completed staff training on the obtaining of grab samples using this system. This item remains open pending licensee actions to resolve the above noted concerns.

Open Item (482/8406-04): NUREG-0737, Item II.F.1-3, Containment High Range Radiation Monitor - The licensee had installed two detectors inside of the reactor containment at approximately the 2,050 foot elevation in a north-south orientation (180° apart). The detector locations were also discussed in Supplement 2 to the Safety Evaluation Report (SER) for WCGS. The detectors appear to satisfy all requirements of NUREG-0737 and Regulatory Guide (RG) 1.97, except that detectors had not been inplace calibrated over the full range (1-10⁷ R/hr), nor had preoperational testing and turnover to the licensee been completed. This item remains open pending licensee action to resolve the above noted concerns.

Open Item (482/8434-02): Meteorological Instrumentation - The NRC inspectors reviewed the licensee's meteorological instrumentation for compliance with the commitments in the safety analysis report (SAR) (NUREG-0881) and the FSAR, the requirements of Supplement 1 to NUREG-0737; and RGs 1.23 and 1.97. The licensee's equipment appears to be of good quality and properly installed. The licensee had implemented suitable calibration procedures and a non-proceduralized surveillance program for the site meteorological instrumentation. The meteorological system data recovery reliability met the recommendations of RG 1.23 and the proposed draft ANSI Standard (ANSI/ANS-2.5-1984) regarding criteria for meteorological measurement systems at nuclear power sites.

The NRC inspectors noted the following concerns involving the licensee's meteorological assessment program. In Supplement 4 to the SAR, paragraph 13.3.2.8, "Emergency Facilities and Equipment," the licensee committed to having in place, by June 1984, an agreement to provide regional weather information with a first order station of the National Weather Service. The NRC inspectors determined during the inspection and during subsequent telephone conversations with licensee representatives on October 5, 1984, that such an agreement had not been effected. The licensee was informed by telephone on October 5, 1984, that this is considered a deviation from the commitment made in the SAR. The requirement for having in effect an agreement with a first order weather service is contained in Supplement 1 to NUREG-0737. (482/8434-01)

The licensee had not installed equipment in the control room that would provide continuous site meteorological data for control room operators use. The licensee intends to satisfy this aspect by installation of a computer terminal in the control room that is tied into the plant radiological release information system (RRIS). The RRIS is addressed in the FSAR Emergency Plan Section. The NRC inspectors noted to the licensee that other than the computer terminal display which appears to satisfy NRC requirements regarding continuous readout and providing hard copy (printout) of data, there were no other meteorological data readouts in the control room. There are continuous meteorological data readouts and permanent data recorders located in an instrument station located adjacent to the meteorological tower. The licensee's program for control room notification of severe weather conditions depends on inputs from either a regional electrical load center, the local sheriff office or emergency communication channel scanners. Two scanners are located in the WCGS security building. Current security department procedures (SEC 50-112 and 127) for notification of the control room in the event of unusual events is vague on specific weather related aspects to be reported and the use, maintenance, and control of the emergency channel scanners. Also, the severe weather notifications from the regional load center had not been proceduralized. The licensee was notified at the exit meeting on September 28, 1984, that the above noted concerns need to be resolved prior to fuel load. The following deficiencies dealing with the meteorological and dose assessment programs involving the manual dose assessment procedure (EPP 01-7.3) were identified:

- The formulae for determining atmospheric diffusion factors (X/Q) were in error.
- The procedure did not provide for an atmospheric stability class "G" which is appropriate for the site.

- The procedure (Attachment 5) used the temperature sensor readings from the 10 and 85 meter tower positions as the primary means of determining differential temperature (ΔT) when RG 1.23 recommends the use of 10 and 60 meter sensor positions, which is considered an industry practice for ground level releases.
- The procedure (Attachment 5) references the use of meteorological instrument (anemometer) which was not included in the emergency locker inventory at the TSC, nor had there been any training provided on the instrument's use.

The licensee acknowledged the above concerns and indicated that corrections to EPP 01-7.3 would be made. Similar concerns regarding EPP 01-7.3 are also addressed in NRC Inspection Report 50-482/84-25, which is an appraisal of the licensee's EP program.

The NRC inspectors also noted during a licensee presented demonstration of the RRIS computer and its ofsite dose assessment capability that meteorological data shown for wind direction varied significantly between sensors at different elevations. The NRC inspectors determined from permanently recorded data at the meteorological tower that all wind direction sensor data (three different sensors) were in agreement at the tower. The licensee indicated that even though all meteorological sensors and recorders had been preoperationally tested and found satisfactory, the accuracy and reliability of the meteorological data and data gathering being provided by the RRIS had not been verified. The aspect of meteorological data gathering reliability following RRIS activation is also discussed in NRC Inspection Report 50-482/84-11, and is being tracked as an open item (482/8411-01). The licensee indicated this verification of RRIS displayed meteorological data is scheduled to be done. Also, the licensee had not issued operating instructions (EPP 01-7.1) for the RRIS, nor had all reactor operators been trained on the use of RRIS.

This item is considered open pending licensee actions to:

- Provide continuous site meteorological data monitors in the reactor control room.
- Establish procedures that identify equipment and information that must be used in making severe weather warnings to the reactor control room shift supervisor.
- Establish an agreement with a first order National Weather Service Station.

- Correct deficiencies in EPP 01-7.3 concerning meteorological data assessment.
- Verify accuracy of data transfer to the RRIS computer system from all other systems used in making offsite dose assessments, including meteorological data.
- Issue operating instructions for the RRIS.
- Complete reactor operator training on the RRIS.
- Proceduralize daily/shift meteorological equipment surveillance activities.

Open Item (482/8434-03): Effluent and Process Monitors for Reactor Accident Assessment - The licensee uses many process and effluent radiation monitors for data input (EPP 01-7.1, "Manual Determination of Release Rate") during offsite dose assessment and in emergency decisionmaking processes. The NRC inspectors determined that required effluent and process monitors for the fuel building, radioactive waste building, containment purge system, unit ventilation system, auxiliary building, and turbine building (including condenser air removal system) had not completed preoperational testing and/or turnover to the licensee from the contractors/vendors. This item remains open pending licensee acceptance, calibration, and verification of operability of the noted systems used to support offsite dose calculations and emergency action decision making processes.

b. Items That Could Impact on Exceeding 5 Percent Power

Open Item (482/8406-01): NUREG-0737, Item II.B.3, Post Accident Sampling System (PASS) Capability - The licensee system is undergoing vendor certification and preoperational testing at the plant. Supplement 4 to the WCGS SAR establishes the operability of the PASS as a condition for exceeding 5 percent power. The licensee had resolved the NRC's concerns regarding mechanical connectors (all are sufficiently contained by the PASS cabinet), and the floor drain and cabinet spray down (licensee will monitor the system during operation plus during periodic surveillances and leak tests). The licensee had completed initial lectures and procedural training for all PASS system operators (chemistry technicians), and upon turnover of the PASS to the plant staff, practical demonstration of PASS operation by each technician will be conducted. The licensee intends to conduct a representative sampling program (two or more chemical

species and a verification of radionuclide concentrations) that compares the PASS reactor coolant, containment sump, and containment atmosphere samples to grab samples of the same medium. This item remains open pending licensee action to resolve the NRC concerns noted above and complete PASS operability tests.

Open Item (482/8434-04): Post Accident Radioactive Liquid Waste Sampling - The licensee intends to use the normal radioactive liquid waste sampling panel, which provides a controlled drain, sample line recirculation, sample station controlled ventilation, and is centrally located, for PASS liquids entering the radioactive liquid waste system. The licensee had not completed preoperational testing of the system, developed operating procedures, conducted system training, or established the need for special radiation shields and remote handling equipment for the samples. The immediate sample panel area is not equipped with an area radiation monitor; however, there is an area monitor in the adjacent counting room near the sample cubicle access. The licensee indicated that during PASS sample collecting using the radioactive liquid waste sample panel, a RP technician and portable radiation monitoring instrumentation would be utilized. The NRC inspectors noted that the sampling panel posed a similar ALARA concern involving the need to disconnect (two threaded connectors) the sample recirculating line prior to drawing a sample, as was noted on the primary coolant sample panel. The licensee is developing a modified sampling rig for the primary sample panel that will provide for recirculation of sample line contents and sample withdrawal without stopping and restarting sample flow or disconnecting hardware. The licensee indicated that the new sample rig would be adapted to the radioactive liquid waste sample panel also. This item is considered open pending licensee action to implement procedures, training, and special equipment for sampling of highly radioactive liquid waste samples following a reactor accident.

4. Exit Interview

The NRC inspectors met with the licensee's representatives denoted in paragraph 1 and the NRC Region IV Task Force Director at the conclusion of the inspection on September 28, 1984. The NRC inspectors discussed the scope and findings of the inspection. The NRC inspectors emphasized the need for the licensee to complete actions to resolve the remaining open items discussed in paragraph 3 that could impact on fuel load and reactor operations exceeding 5 percent power.

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December 28, 1984

Regional Administrator
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Re: Peach Bottom Atomic Power Station, Units 2 & 3
Docket Nos. 50-277 & 50-278

Dear Sir:

Transmitted herewith in accordance with Section 50.54(p) of the Commission's Regulations are five copies of Revisions to the Physical Security Plan for Peach Bottom Atomic Power Station consisting of the page changes listed on the attachment to this letter. The Revisions reflect changes to the Protected Area and will not decrease the safeguards effectiveness of the Physical Security Plan. A more detailed explanation of the changes and additional information related thereto is provided in the enclosure to this letter.

In accordance with Sections 2.790 and 73.21 of the Commission's Regulations, it is hereby requested that the enclosed Revisions to the Security Plan and the enclosures listing the changes and explaining them in detail be withheld from public disclosure. An affidavit in support of this request is attached hereto.

Very truly yours,

Eugene J. Bradley
Eugene J. Bradley

*To: Region I
Drawings
Non-Replicable*

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Attachments

ENCLOSURE(S) CONTAIN(S) SAFEGUARDS
INFORMATION

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COMMONWEALTH OF PENNSYLVANIA

:

ss.

COUNTY OF PHILADELPHIA

:

S. L. Daltroff, being first duly sworn, deposes and states that:

1. He is Vice President of Philadelphia Electric Company, Licensee under Facility Operating Licenses DPR-44 and DPR-56 for Peach Bottom Atomic Power Station, Units 2 and 3;

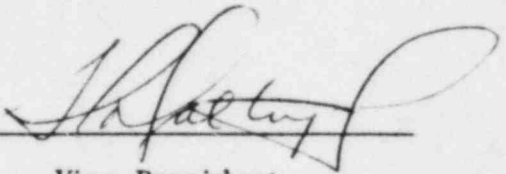
2. He has reviewed revised pages of the Physical Security Plan for Peach Bottom Atomic Power Station dated December, 1984 and the listing and explanation of the changes to the plan (hereinafter collectively the "Revisions") and knows the contents thereof. The Revisions will not reduce the safeguards effectiveness of the Security Plan;

3. The Revisions which are sought to be withheld from public disclosure contain details relating to the Physical Security Plan for Peach Bottom Atomic Power Station, Units 2 and 3;

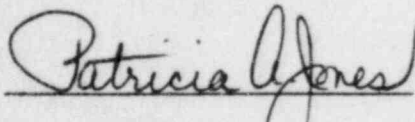
4. The information set forth in the Revisions has been treated as confidential and proprietary information and has been withheld from public disclosure by Licensee in accordance with Licensee's practice of treating all information dealing with the details of security plans as confidential and proprietary information, and;

5. The Revisions should be considered by the NRC as confidential and proprietary information and be withheld from public disclosure on the grounds that they contain Safeguards Information, they contain details relating to the

Physical Security Plan of a licensed facility, they contain detailed information which could be used to compromise the safety and security of the facility, such disclosure is not required in the public interest and such disclosure would adversely affect the interests of Philadelphia Electric Company.


Vice President

Subscribed and sworn to
before me this 26th day
of December, 1984.


Notary Public

PATRICIA A. JONES
Notary Public, Phila., Phila. Co.
My Commission Expires Oct. 13, 1986

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

January 9, 1985

Director of Nuclear Reactor Regulation
Attention: Ms. E. Adensam, Chief
Licensing Branch No. 4
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Ms. Adensam:

In the Matter of the Application of) Docket Nos. 50-390
Tennessee Valley Authority) 50-391

Reference: Letter to you from L. M. Mills dated August 20, 1981.

Appendix D of the Watts Bar Nuclear Plant Safety Evaluation Report (SER) reflects TVA's commitment made in the referenced letter to provide photographs of the Main Control Room. To fulfill this commitment, TVA is providing, with a copy of this letter, one set of the subject photographs directly to the NRC Project Manager.

We would like to take this opportunity to clarify TVA's intent with respect to submittal of photographs as they are related to the Appendix D commitment.

The attached photographs represent panels which have and have not received a human factors review. The scope of the panels addressed by the SER Appendix D items are panels 1-M-1 through 1-M-6. A preliminary assessment (PA) was performed in 1980 for Sequoyah and Watts Bar and the PA focused primarily on the safety-related panels in the main operation area (1-M-1 through 1-M-6). This can be shown by a review of the corrections performed on Sequoyah. The Sequoyah corrections focused primarily in the main operating area (1-M-1 through 1-M-6). The corrections outside this main area focused on problems such as the panels between the horseshoes of each unit and being able to determine which controls were associated with each unit. This was corrected by placing a large tag with "0" for common, "1" for unit 1 and "2" for unit 2 on devices where confusion was possible. Therefore, the panels which have received a concentrated human factors review in regards to Appendix D are of the Watts Bar SER those in the unit 1 main operating area (1-M-1 through 1-M-6). A majority of the panels which are common to units 1 and 2 were also reviewed, but not as extensively as those in the unit 1 horseshoe. The back row panels and the unit 1 auxiliary control panels were not within the scope of Appendix D since they did not require rapid response operation actions.

The photographs are in no way intended to reflect normal or abnormal lighting levels in the control room nor are they intended to reflect the status of the SER Appendix D modifications. It is impossible for photographs to truly represent adequate or inadequate lighting since various amounts of light can be obtained with the different positioning of the camera, type of camera equipment, and even the photographers. It is unfortunate that this commitment is included with information related to lighting because the photographs are not related to any commitment to the NRC concerning main control room lighting levels.

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Director of Nuclear Reactor Regulation

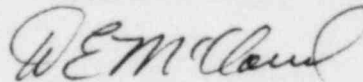
January 9, 1985

The photographs of the main control room panels satisfy a verbal commitment made to an NRC Human Factors Engineering Branch (HFEB) reviewer during the 1980/81 timeframe. They were originally intended to be photographs taken at a distance showing labeling and the general layout of the panels. However, as part of TVA's overall control room design review efforts to meet the requirements of NUREG-0700, detailed mosaic photographs were taken in an effort to satisfy both TVA's commitment in Appendix D as well as the control room review requirements in NUREG-0700 to provide photographs to the control room design review (CRDR) team. Unfortunately, the quality of these photographs was not satisfactory for the NUREG-0700 review requirements, but the photographs are more than fully adequate to satisfy the commitment identified in Appendix D. Therefore, the photographs are being submitted to the NRC to close the commitment identified in Appendix D for main control room panel photographs.

If you have any questions concerning this matter, please get in touch with D. P. Ormsby at FTS 858-2682.

Very truly yours,

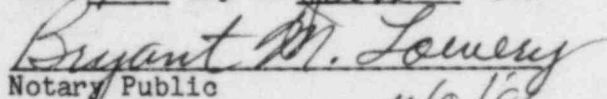
TENNESSEE VALLEY AUTHORITY



D. E. McCloud

Nuclear Engineer

Sworn to and subscribed before me
this 9th day of Jan. 1985



Notary Public

My Commission Expires 4/8/86

cc: U.S. Nuclear Regulatory Commission
Region II
Attn: Mr. James P. O'Reilly Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323