

APPENDIX A

NOTICE OF VIOLATION

Philadelphia Electric Company
2301 Market Street
Philadelphia, Pennsylvania 19101

Docket Nos. 277/278
License Nos. DPR 44/50

As a result of the inspection conducted on January 7-11, 1985, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), published in the Federal Register on March 8, 1984 (FR 9987), the following violations were identified:

Changes to the Emergency Preparedness Program

- (1) Section 9.2 of the Peach Bottom Emergency Plan states; "A specific procedure listing emergency telephone numbers shall be updated at least quarterly". 10 CFR 50.54(q) requires a licensee to follow and maintain emergency plans.

Contrary to the above, the inspector found that implementing procedure, EP-209, Rev. 7; "Telephone List for Emergency Use" had not been updated in accordance with the Plan. The procedure EP-209, had not been updated as follows: Appendices D-6 and G overdue 17 months; Appendices A, F, J, K and N overdue 15 months, and; Appendices E and H overdue 9 months.

This is a Severity Level V violation. (Supplement 1)

The licensee has already made temporary changes to the Telephone Call-Out list and provided for an update in accordance with the Plan.

Emergency Plan and Procedure Training

- (2) Section 8 of the Emergency Plan dated December, 1983, states "qualifications to assume an emergency organization position is met by virtue of holding the designated position in the Corporate or Plant staff organization and by completion of the training required by Table 8.1." Table 8.1 describes the general areas of training required for the Emergency Organization Positions for, "Initial Training" and also for, "Annual Retraining". 10 CFR 50.54(q) requires a licensee to follow and maintain emergency plans.

The document, "Emergency Plan Training Program", contains a training matrix that specifies the training lesson plans required for each response organization position. The lesson plans are noted as being either, "detailed" or, "abbreviated".

Contrary to the above, the inspector found that for the calendar year 1984 members of the emergency response organization had not received training as stated in the Plan. The following are results from the review of 35

records from members of the emergency response organization: 11 persons had no lesson plan (LP) training; 14 persons had missed 3 detailed LP training sessions; 3 persons had missed 2 detailed LP training sessions; 2 persons had missed, detailed LP session and only 5 persons had received all the LP training described in the Peach Bottom Emergency Plan. No records were available for the abbreviated session plans (LP's) described in the E-Plan.

This is a Severity Level V violation. (Supplement 1)

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 to remaining procedural inadequacies, including: (1) the additional 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.