

APPENDIX A
NOTICE OF VIOLATION

Philadelphia Electric Company
Peach Bottom Atomic Power Station Unit 2
Delta, Pennsylvania

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

During an NRC inspection conducted on June 4, and 9-13, 1985 a violation of NRC requirements was identified. The violation involved operation of Peach bottom Atomic Power Station Unit 2 from July 28, 1982 to April 28, 1984 without having performed an adequate Type C containment leak test on valves A0-2502B and A0-2520. In accordance with the "General Statement of Policy on Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the violation is listed below:

- A. 10 CFR 50 Appendix J in Section III.C.1 requires in part that, "Type C test pressure be applied in the same direction as that when the valve would be required to perform its safety function unless it can be determined that the results from tests for a pressure applied in a different direction will provide equivalent or more conservative results." 10 CFR 50 Appendix J Section III.D.3 and technical specification 4.7.A.2.f. require in part that, "Type C tests shall be performed at intervals no greater than two years."

Contrary to the above, Type C testing performed on Torus Vacuum Relief Valve A0-2502B and Drywell air and nitrogen purge valve A0-2520 did not test the leakage boundary of the valve stem during reverse pressure testing performed on July 20, 1980, July 25, 1980, May 19, 1982, May 28, 1982, June 1, 1982, June 8, 1982, and July 14, 1982. The valve stem is subjected to accident pressure and is required to perform a safety function. The reverse pressure testing performed did not test the valve stem due to the specific valve orientation. The containment integrated leak rate test was conducted satisfactorily on July 28, 1980. Peach Bottom Unit 2 is considered to be in violation of this requirement only for the period July 28, 1982 to April 28, 1984, when the Unit 2 refueling outage was begun, since the containment integrated leak rate test satisfied the Type C testing requirement for the period July 28, 1980 to July 28, 1982.

This is a Severity Level IV 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 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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