

PHILADELPHIA ELECTRIC COMPANY

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JOSEPH W. GALLAGHER
VICE PRESIDENT
NUCLEAR OPERATIONS

January 11, 1988

Docket Nos. 50-277
50-278

Mr. William V. Johnston, Acting Director
Division of Reactor Safety
Region I
U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

SUBJECT: Peach Bottom Atomic Power Station
Inspection Report No. 50-277/87-30; 50-278/87-30

Dear Mr. Johnston:

Your letter dated December 4, 1987 forwarded the subject Inspection Report for Peach Bottom Units 2 and 3, and required a response by January 4, 1988. On January 7, 1988 W. M. Alden, Philadelphia Electric Company, discussed with Mr. J. Linville, NRC-Region I, the need for an additional week to provide a complete response.

Appendix A of your letter identified an activity which did not appear to comply with the Commission's regulations. This apparent violation is restated below, followed by Philadelphia Electric Company's response.

RESTATEMENT OF APPARENT VIOLATION:

10 CFR 50 Appendix R Section III.I.3.b. requires that fire brigade drills shall be performed at regular intervals with each fire brigade member participating in at least two drills per year.

Section III.I.1.a. requires that initial and periodic refresher training be provided to all fire brigade members.

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Contrary to the above, on October 20, 1987, it was determined that at least 20 fire brigade members did not participate in the required two drills per year and five members did not attend either the initial or refresher training required for brigade membership. Also on October 20, 1987, it was determined that a similar type of brigade training deficiency was identified in 1983 by NRC as a violation and was allowed to recur in 1984, in 1985 and in 1986 as evidenced by the QA audits of the fire brigade training for those years.

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

RESPONSE:

Admission or Denial of Apparent Violation:

Philadelphia Electric Company acknowledges that it did not comply with NRC requirements as stated in the Notice of Violation.

Reason for Violation:

This violation occurred because the responsibilities and procedures for tracking fire brigade members' qualifications, bringing deficiencies to the attention of station management and assuring their correction had not been established. As noted in your letter, steps taken in the past to prevent recurrence of similar violations were not effective.

Extent or Significance of Violation:

Each operating shift must contain a fire brigade consisting of five qualified members, including a brigade leader. At Peach Bottom a senior licensed operator on each operating shift serves as brigade leader for his shift. To be qualified as a brigade member, individuals must have completed initial training and must periodically complete refresher training. One element of these training programs is referred to at Peach Bottom as site-specific training, and is conducted on-site. The other element is a general fire fighting course conducted at the Philadelphia Electric Company Fire School. Brigade members also must periodically participate in drills, practice sessions and fire protection meetings.

At least one of the fire brigade members on each operating shift was not fully qualified at the time of the inspection. One individual who had been a fire brigade leader for approximately 1 1/2 years has not attended initial training. Two other individuals who had been fire brigade leaders for approximately nine months have completed the initial Fire School training, but have not completed the initial site-specific training. Two fire brigade leaders and two other brigade members were overdue (approximately one month) for site-specific refresher training; however, each of these individuals had completed the Fire School refresher training in accordance with the required schedule. One individual (auxiliary operator) who had been a brigade member for approximately one year has completed the Fire School initial training, but has not completed the site-specific initial training. As stated in the Notice of Violation, several members are also overdue for drill participation. The current extent of overdue drill status has not yet been fully determined. It is clear that having fire brigade members who hadn't completed initial training and failure to keep brigade members up-to-date on training and drill participation might have degraded fire fighting capability.

Corrective Actions Taken and Results Achieved:

Immediate corrective actions have been taken to ensure that the fire brigade consists of fully trained members. The personnel who currently do not satisfy the Appendix R training requirements have been deemed ineligible for fire brigade membership, and will remain so until the required training has been completed. The personnel deficient in initial and refresher Fire School training have been scheduled to complete this training by April 30, 1988. The individuals deficient in site-specific training have been scheduled to complete this training by February 19, 1988.

To compensate for the deficient training status of the normal fire brigade leaders on each shift, the following policy has been implemented. Each Shift Manager, in the event of a fire, shall take one of the following actions:

- a) The Shift Manager shall serve as brigade leader, if qualified, leaving the normal brigade leader (holding a senior operator license) in charge of the Control Room; or
- b) The Shift Manager shall dispatch five qualified brigade members, one of whom shall be a senior plant operator (non-licensed) that will act as the fire brigade leader. Also, the normal fire brigade leader, who may be deficient in fire brigade training but holds a senior

- operator license, will accompany them to provide additional technical assistance; or
- c) The Shift Manager shall dispatch five qualified brigade members, one of whom shall be a senior plant operator (non-licensed) that will act as the fire brigade leader. Also, the Shift Technical Advisor will accompany them to provide additional technical assistance.

This policy shall remain in effect until all the normal fire brigade leaders complete the required training. As an interim measure, individuals will be considered qualified as fire brigade members if they have completed the initial training and refresher training as required, regardless of their drill participation status. A review is in progress to determine the current status of each fire brigade member with respect to drill participation. The personnel deficient in fire drill participation will participate in the required number of drills by April 30, 1988.

Corrective Actions to be Taken to Prevent Recurrence:

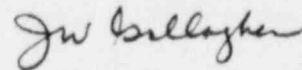
Responsibilities have been established to ensure that fire brigade members' training records are actively monitored. The station Training Section will increase its review of fire brigade training records from annually to quarterly, and will have overall responsibility for tracking fire brigade training and drill attendance. Members' training status and any requirements which must be fulfilled in the next quarter will be reported quarterly by the Training Section to the Operations Support Engineer and Fire Protection Coordinator. The station Training Section will notify the Operations Support Engineer of pending deficiencies so that they can be avoided. If deficiencies arise, the Operations Support Engineer will ensure that the individuals who are deficient in fire brigade training are not used to satisfy fire brigade staffing requirements until they are fully qualified. In the future, a person will not be considered qualified to become a member of the fire brigade until successfully completing the initial training.

The restructuring of the Peach Bottom staff (as described in License Amendment Application submitted to NRC on November 19, 1987) will enable station management to be more involved in daily activities and more accessible to ensure timely implementation of corrective actions to prevent non-compliance. This is being accomplished by further separating responsibilities and establishing additional management positions horizontally within the organization. The organization under the Operations Support Engineer is a new facet of the restructured Peach Bottom staff. This group was created to focus on administrative

responsibilities associated with operations, such as scheduling fire brigade training. The creation of the Training Superintendent position reporting directly to the station Vice President will enhance the attention given to training requirements for plant personnel. These organizational improvements will assure that priority attention is given to fire brigade training.

If you have any questions or require additional information, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in cursive script, appearing to read "JW Sullivan".

cc: Addressee
W. T. Russell, Administrator, Region I, USNRC
T. P. Johnson, NRC Resident Inspector