

APPENDIX A

NOTICE OF VIOLATION

Philadelphia Electric Company  
Peach Bottom Atomic Power Station, Units 2 and 3

Docket Nos. 50-277; 50-278  
License Nos. DPR-44; DPR-56

As a result of the inspection conducted on November 2-6, 1987, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy) (1987), the following violations were identified:

A. 10 CFR 50, Appendix B, Quality Assurance Criteria for Nuclear Power Plants contains regulatory requirements relating to documents and procedure control. Two examples of the licensee's inservice testing (IST) activities not meeting this regulatory requirement were:

1. 10 CFR 50, Appendix B, Criterion VI, Document Control, states in part "Measures shall be established to control the issuance of documents, such as instructions, procedures, and drawings, including changes thereto, which prescribe all activities affecting quality. These measures shall assure that documents, including changes, are reviewed for adequacy..... Changes to documents shall be reviewed and approved by the same organizations that performed the original review....."

The licensee's Operations Quality Assurance Program requires measures to assure that documents, including changes, which effect quality are reviewed for adequacy and approved for release by authorized personnel and are distributed to and used at the location where the prescribed activity is performed.

Contrary to the above, as of November 6, 1987, copies of the licensee's second 10-year IST program for pumps and valves have been distributed to different site organizations as uncontrolled documents. Changes have been made locally by the users without formal review or approval.

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

2. 10 CFR 50, Appendix B, Criterion V, Instructions Procedures and Drawings, states in part that, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings...and shall be accomplished in accordance with these instructions, procedures or drawings."

The licensee's surveillance test (ST) procedure ST 6.10-3 requires that the "Additional action required" portion of the cover sheet be filled in and signed when pump test results are in the Alert Range.

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Contrary to the above, the 6.10-3 test records of 6/19/87 and 7/17/87 showed the pumps to be in the Alert Range and the "Additional action required" portion of the cover sheet had no entry in both instances and was not signed in one instance.

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

- B. 10 CFR 50.55a(g) requires adherence to Section XI of the ASME Boiler and Pressure Vessel Code for inservice testing (IST) of pumps and valves. The licensee's second ten year interval IST program commits to compliance with the requirements of the 1980 Edition of Section XI, through 1981 winter addenda. Two examples of the licensee's IST activities not meeting Section XI requirements were:

1. ASME Section XI, IWP-3100 requires that pump operational reference values be established. IWP-3100 required that "the resistance of the system shall be varied until either the measured differential pressure or the measured flow rate equals the corresponding reference value".

Contrary to the above, the licensee's procedure 6.10-3 contains criteria that permits simultaneous variation of pressure and flow from the reference values. This permits a broader acceptable range and is not in accordance with Section XI.

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

2. ASME Section XI, IWP-3500(b) for measurement of pump bearing temperature requires that, "each pump shall be run until the bearing temperatures stabilize, and then ..... be measured or observed and recorded. A bearing temperature shall be considered stable when three successive readings taken at 10 minutes intervals do not vary by more than 3%".

Contrary to the above, the licensee's procedure ST 6.5, Rev. 42, doesn't specify this requirement, doesn't provide the space for recording three readings and doesn't specify acceptance criteria for bearing temperatures.

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.