

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET
P.O. BOX 8699
PHILADELPHIA, PA 19101

(215) 841-5001 10 CFR 2.201

JOSEPH W. GALLAGHER
VICE PRESIDENT
NUCLEAR SERVICES

May 16, 1988

Docket Nos. 50-277
50-278

Mr. Ronald R. Bellamy, Chief
Facilities Radiological Safety
and Safeguards Branch
U.S. Nuclear Regulatory Commission
Region I
Attn: Document Control Desk
Washington, DC 20555

Subject: Response to NRC Combined Inspection
Report 50-277/88-09 and 50-278/88-09 for
Peach Bottom Atomic Power Station

Dear Mr. Bellamy:

Your letter dated April 16, 1988 transmitted Combined Inspection Report 50-277/88-09 and 50-278/88-09 for the routine emergency preparedness inspection conducted February 29 through March 3, 1988. Appendix A of your letter identified an item which does not appear to be in full compliance with NRC requirements. Our response to this violation is provided in an Attachment to this letter.

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

Very truly yours,

JW Gallagher

Attachment

cc: Addressee
W. T. Russell, Administrator, Region I, USNRC
T. P. Johnson, USNRC Senior Resident Inspector
T. E. Magette, State of Maryland

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Restatement of Violation:

10 CFR 50.54(t) requires an annual review of the emergency preparedness program and that the results of the review, along with recommendations for improvements, be documented and reported to the licensee's corporate and plant management and retained for a period of five years.

Contrary to the above, the licensee did not maintain documentation of the 1983 annual emergency preparedness audit, did not perform an annual audit during 1985, and did not report the results of the 1986 annual audit to appropriate corporate and plant management.

This is a Severity Level IV Violation (Supplement VIII)

Response:

In the following response, the term "review" refers to the activities required by 10 CFR 50.54(t), and the term "audit" refers to the activities required by PBAPS Technical Specification 6.5.2.8.e.

Admission or Denial of the Violation:

Philadelphia Electric Company acknowledges the violation as stated.

Reason for the Violation:

The reason for not maintaining documentation of the 1983 annual emergency preparedness review, not performing an annual review during 1985, and not reporting the results of the 1986 annual review to appropriate corporate and plant management is that no clear assignments of responsibility for generation, distribution and retention of an annual emergency preparedness review existed at the time. The 10 CFR 50.54(t) review in 1986 was performed by Enercon Services under a contract administered by the Emergency Preparedness Section. It was felt by Emergency Preparedness after the review was completed that Emergency Preparedness could not issue the results of the review because they lacked the required independence. This situation was not resolved and consequently the distribution was not completed.

Significance of Violation:

From 1983 through today, PBAPS has demonstrated an adequate emergency response capability through the effective conduct of drills and exercises. The results of the 10 CFR 50.54(t) review performed in 1986 did not identify any significant conditions adverse to the quality of the Emergency Preparedness Program. The review stated, "The Review Team determined, based on the information, facilities equipment reviewed and the individuals interviewed, that the PBAPS Emergency Preparedness Program is generally in a state of preparedness to respond adequately to an emergency." Further, although reviews were not performed in accordance with 10 CFR 50.54(t), the annual audit of the PBAPS Emergency Preparedness Program as required by the Technical Specifications has been performed each year.

Corrective Actions Taken and Results Achieved:

The failure to maintain documentation of the 10 CFR 50.54(t) review performed in 1983 and the failure to perform a review in 1985 cannot be retroactively corrected. The 1986 10 CFR 50.54(t) review results have been reevaluated by the Emergency Preparedness Section, and the open items have been distributed to appropriate corporate and plant management for resolution. Action plans have been developed for the tracking and closure of the items.

Corrective Action Taken to Avoid Future Non-Compliance:

Nuclear Quality Assurance (NQA), formerly the Nuclear Operations Quality Assurance Division, did complete the 1987 10 CFR 50.54(t) review, and has been assigned the responsibility for the performance of future reviews and the distribution and retention of the results. This group has had the responsibility for the performance of the audits of the Emergency Preparedness Program as required by the PBAPS Technical Specifications. The results of the 10 CFR 50.54(t) reviews will be distributed to appropriate corporate and plant management. The findings and associated corrective actions and recommendations will be dispositioned and tracked in accordance with Emergency Preparedness Section procedures.

Date When Full Compliance Will Be Achieved:

The reevaluation of the results of the 10 CFR 50.54(t) review performed in 1986 was completed in January 1988 and individual items were entered into the Emergency Preparedness Action Item Tracking System. Completion dates for resolution of all items not previously closed were established as of March 31, 1988.