

PHILADELPHIA ELECTRIC COMPANY

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SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

(215) 841-5001

March 7, 1986

Docket Nos. 50-277
50-278

Inspection Report Nos. 50-277/86-01
50-278/86-01

Mr. Thomas T. Martin, Director
Division of Radiation Safety and Safeguards
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Martin:

Your letter dated February 6, 1986 forwarded Combined Inspection Report Nos. 50-277/86-01; 50-278/86-01 for Peach Bottom Atomic Power Station. Appendix A of your letter addresses one item which does not appear to be in full compliance with Nuclear Regulatory Commission requirements. This item is restated below followed by our response.

As a result of the inspection conducted on January 6-10, 1986, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violation was identified:

Section 6.9.2.h(2) of the Units 2 and 3 Technical Specifications states that "The Radioactive Effluent Release Reports shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the site."

Contrary to the above, although the sampling and analysis was performed for Fe-55 as required by Table 4.8.1 of the Technical Specifications, this nuclide was not included in the summary of liquid effluents.

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

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Admission of Alleged Violation:

Philadelphia Electric Company acknowledges the violation as stated.

Reason for Violation:

The reason for the violation is personnel oversight. The results of the isotopic analyses of liquid radioactive releases are compiled and listed in tabular format for incorporation into the Semi-Annual Effluent Releases Report. The pre-established form for identifying the isotopes for which data is required had been revised by the technician compiling the reportable data. In the process of revising the form, the Fe-55 isotope was inadvertently deleted, resulting in a failure to provide the required release information.

Significance of Violation:

Sampling and analysis for Fe-55 is performed in accordance with Technical Specification 4.8.B.1c. The results of the Fe-55 analyses are documented in surveillance test ST-7.5.1.f. Failure to list this information in the Semi-Annual Effluent Releases Report had no adverse effect on plant or public safety. The radiation exposure contribution for Fe-55 was less than 0.01 mR for the subject six-month reporting period.

Corrective Actions Taken and Results Achieved:

The technician responsible for compiling the Semi-Annual Effluent Report data has been counseled on how to properly complete the forms identifying the reportable data. The analysis results pertaining to Fe-55 have been added to Revision 2 of the Semi-Annual Effluent Releases Report No. 19.

Corrective Actions Taken to Avoid Future Non-Compliance:

The Senior Chemist, during his review of the pre-established forms identifying the reportable data prepared by the technician, will confirm that the forms have not been revised to exclude reportable data.

Date When Full Compliance was Achieved:

Full compliance was achieved when Revision 2 of the Semi-Annual Effluent Releases Report No. 19 was submitted to NRC on February 26, 1986.

Should 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 "Alfred J. P.", is written in dark ink.

cc: T. P. Johnson, Resident Site Inspector