

NOTICE OF VIOLATION

PECO Energy Company
Peach Bottom Atomic Power Station Units 2 & 3
Delta, PA

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

During an NRC inspection conducted from November 16, 1998, through December 4, 1998, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions, NUREG-1600, this violation is listed below:

10 CFR 50, Appendix B, Criterion III, Design Control, states: "Measures shall be established to assure that regulatory requirements and the design basis, as defined in 50.2 and as specified in the license application, for those structures, systems, and components to which this appendix applies are correctly translated into specifications, drawings, procedures, and instructions."

The Updated Final Safety Analysis Report (UFSAR) Section 4.7, discusses the reactor core isolation cooling (RCIC) system design features that ensure adequate net positive suction head (NPSH) for the RCIC pump. These design features include the suction swap-over from the condensate storage tank (CST) to the torus, and the suction piping configuration.

Contrary to the above, on December 4, 1998, there were two instances where PECO had failed to properly translate design information into procedures used for safety-related activities as follows:

1. In procedure ST-0-013-301-2, RCIC Pump, Valve, Flow and Unit Cooler Functional and In-Service Test, the maximum opening stroke times specified for RCIC system valves MO-13-39 and MO-13-41 were 39.5 and 40 seconds respectively. However, in calculation 18247-M-016, RCIC Pump Transfer Timing, the maximum opening stroke times for RCIC valves 13-39 and 41 to ensure adequate NPSH for the RCIC pump, during suction swap-over from the CST to the Torus, were determined to be 37.75 seconds.
2. In emergency operating procedure (EOP) T-102, "Primary Containment Control," step T/T-7, PECO failed to properly consider the as-built piping configuration for the RCIC suction piping from the torus in determining the maximum torus water temperature for adequate net positive suction head (NPSH) for the RCIC pump. This error caused a higher than acceptable water temperature of 200°F to be used for the bases of NPSH curves.

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

The NRC has concluded that the information regarding the reason for the violation, the actions taken and planned to correct the violation and prevent recurrence, and the date when full compliance was achieved is already adequately addressed on the docket in inspection report No. 50-277(278)/98-09. However, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 if the description therein does not accurately reflect your corrective actions or your position. In that case, or if you chose to respond, clearly mark your response as a "Reply to a Notice of Violation," and send it to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region I, and a copy to the NRC Resident Inspector at the facility that is subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice).

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If you contest this enforcement action, you should also provide a copy of your response to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at King of Prussia, Pennsylvania
this 1st day of February, 1999