



### RESPONSE TO FREEDOM OF INFORMATION ACT (FOIA) / PRIVACY ACT (PA) REQUEST

99-076

17

RESPONSE TYPE  FINAL  PARTIAL

REQUESTER

Mr. Paul Gunter

DATE SEP 18 2000

#### PART I. - INFORMATION RELEASED

- No additional agency records subject to the request have been located.
- Requested records are available through another public distribution program. See Comments section.
- APPENDICES  Agency records subject to the request that are identified in the listed appendices are already available for public inspection and copying at the NRC Public Document Room.
- APPENDICES **II** Agency records subject to the request that are identified in the listed appendices are being made available for public inspection and copying at the NRC Public Document Room.
- Enclosed is information on how you may obtain access to and the charges for copying records located at the NRC Public Document Room, 2120 L Street, NW, Washington, DC.
- APPENDICES **II, JJ** Agency records subject to the request are enclosed.
- Records subject to the request that contain information originated by or of interest to another Federal agency have been referred to that agency (see comments section) for a disclosure determination and direct response to you.
- We are continuing to process your request.
- See Comments.

#### PART I.A - FEES

AMOUNT \*  
\$

\* See comments for details

- You will be billed by NRC for the amount listed.
- None. Minimum fee threshold not met.
- You will receive a refund for the amount listed.
- Fees waived.

#### PART I.B - INFORMATION NOT LOCATED OR WITHHELD FROM DISCLOSURE

- No agency records subject to the request have been located.
- Certain information in the requested records is being withheld from disclosure pursuant to the exemptions described in and for the reasons stated in Part II.
- This determination may be appealed within 30 days by writing to the FOIA/PA Officer, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001. Clearly state on the envelope and in the letter that it is a "FOIA/PA Appeal."

#### PART I.C COMMENTS (Use attached Comments continuation page if required)

SIGNATURE - FREEDOM OF INFORMATION ACT AND PRIVACY ACT OFFICER

Carol Ann Reed

**RESPONSE TO FREEDOM OF INFORMATION ACT (FOIA) / PRIVACY ACT (PA) REQUEST**

99-076

SEP 18 2000

**PART II.A -- APPLICABLE EXEMPTIONS**

APPENDICES  
JJ, KK

Records subject to the request that are described in the enclosed Appendices are being withheld in their entirety or in part under the Exemption No.(s) of the PA and/or the FOIA as indicated below (5 U.S.C. 552a and/or 5 U.S.C. 552(b)).

- Exemption 1: The withheld information is properly classified pursuant to Executive Order 12958.
- Exemption 2: The withheld information relates solely to the internal personnel rules and procedures of NRC.
- Exemption 3: The withheld information is specifically exempted from public disclosure by statute indicated.
  - Sections 141-145 of the Atomic Energy Act, which prohibits the disclosure of Restricted Data or Formerly Restricted Data (42 U.S.C. 2161-2165).
  - Section 147 of the Atomic Energy Act, which prohibits the disclosure of Unclassified Safeguards Information (42 U.S.C. 2167).
  - 41 U.S.C., Section 253(b), subsection (m)(1), prohibits the disclosure of contractor proposals in the possession and control of an executive agency to any person under section 552 of Title 5, U.S.C. (the FOIA), except when incorporated into the contract between the agency and the submitter of the proposal.
- Exemption 4: The withheld information is a trade secret or commercial or financial information that is being withheld for the reason(s) indicated.
  - The information is considered to be confidential business (proprietary) information.
  - The information is considered to be proprietary because it concerns a licensee's or applicant's physical protection or material control and accounting program for special nuclear material pursuant to 10 CFR 2.790(d)(1).
  - The information was submitted by a foreign source and received in confidence pursuant to 10 CFR 2.790(d)(2).
- Exemption 5: The withheld information consists of interagency or intraagency records that are not available through discovery during litigation. Applicable privileges:
  - Deliberative process: Disclosure of predecisional information would tend to inhibit the open and frank exchange of ideas essential to the deliberative process. Where records are withheld in their entirety, the facts are inextricably intertwined with the predecisional information. There also are no reasonably segregable factual portions because the release of the facts would permit an indirect inquiry into the predecisional process of the agency.
  - Attorney work-product privilege. (Documents prepared by an attorney in contemplation of litigation)
  - Attorney-client privilege. (Confidential communications between an attorney and his/her client)
- Exemption 6: The withheld information is exempted from public disclosure because its disclosure would result in a clearly unwarranted invasion of personal privacy.
- Exemption 7: The withheld information consists of records compiled for law enforcement purposes and is being withheld for the reason(s) indicated.
  - (A) Disclosure could reasonably be expected to interfere with an enforcement proceeding (e.g., it would reveal the scope, direction, and focus of enforcement efforts, and thus could possibly allow recipients to take action to shield potential wrongdoing or a violation of NRC requirements from investigators).
  - (C) Disclosure would constitute an unwarranted invasion of personal privacy.
  - (D) The information consists of names of individuals and other information the disclosure of which could reasonably be expected to reveal identities of confidential sources.
  - (E) Disclosure would reveal techniques and procedures for law enforcement investigations or prosecutions, or guidelines that could reasonably be expected to risk circumvention of the law.
  - (F) Disclosure could reasonably be expected to endanger the life or physical safety of an individual.
- OTHER (Specify)

**PART II.B -- DENYING OFFICIALS**

Pursuant to 10 CFR 9.25(g), 9.25(h), and/or 9.65(b) of the U.S. Nuclear Regulatory Commission regulations, it has been determined that the information withheld is exempt from production or disclosure, and that its production or disclosure is contrary to the public interest. The person responsible for the denial are those officials identified below as denying officials and the FOIA/PA Officer for any denials that may be appealed to the Executive Director for Operations (EDO).

DENYING OFFICIAL	TITLE/OFFICE	RECORDS DENIED	APPELLATE OFFICIAL		
			EDO	SECY	IG
Guy Caputo	Director, Office of Investigations	Appendix JJ, KK/2, KK/3, KK/4	✓		
Ellis W. Merschoff	Regional Administrator, Region IV	KK/1	✓		

Appeal must be made in writing within 30 days of receipt of this response. Appeals should be mailed to the FOIA/Privacy Act Officer, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, for action by the appropriate appellate official(s). You should clearly state on the envelope and letter that it is a "FOIA/PA Appeal."

**APPENDIX II  
RECORDS BEING RELEASED IN THEIR ENTIRETY**

<b><u>NO.</u></b>	<b><u>DATE</u></b>	<b><u>DESCRIPTION/(PAGE COUNT)</u></b>
<b><u>OI Case 4-97-003</u></b>		
1.	1/6/97	Exhibit 2 to OI Case 4-97-003, Condition Report-River Bend Station (3 pages)
<b><u>OI Case 1-95-012</u></b>		
2.	2/22/95	Allegation Disposition Record-RI-95-A-0029 (1 page)
<b><u>OI Case 2-93-030</u></b>		
3.	5/27/93	Allegation Review Panel Cover Sheet (1 page)
4.	10/18/95	Letter to O. Kingsley, TVA, from E. Merschoff, RII, Subject: Predecisional Enforcement Conference (EA 95-220) (Atts.-Agenda and Distribution Lists) (7 pages)
5.	10/18/95	Letter to R. Kelly, SWEC, from E. Merschoff, RII, Subject: Predecisional Enforcement Conference (EA 95-190) (Atts.-Agenda and Distribution Lists) (7 pages)
<b><u>OI Case 3-93-001</u></b>		
6.	12/8/92	Memorandum to C. Norelius, RIII, from D. Funk, RIII, Subject: Allegation re: Employment Discrimination at TSI (Atts.-Allegation Management System Form (2 pages)
7.	12/18/92	Memorandum to E. Pawlik, OI, from D. Funk, RIII, Subject: Allegation re: Employment Discrimination at TSI (1 page)
<b><u>OI Case 3-96-032</u></b>		
8.	8/30/96	Memorandum to G. Grant, RIII, from D. Funk, RIII, Subject: OI Report of Interview D.C. Cook: Alleged Falsification of Firewatch Logs (OI Case No. 3-96-032) (AMS No. RIII-96-A-0090) (1 page)
<b><u>OI Case 4-95-070</u></b>		
9.	4/30/96	Allegation Assignment Form RIV-95-A-0237 (1 page)

**APPENDIX II  
(continued)  
RECORDS BEING RELEASED IN THEIR ENTIRETY**

<b><u>NO.</u></b>	<b><u>DATE</u></b>	<b><u>DESCRIPTION/(PAGE COUNT)</u></b>
10.	Undated	Exhibit 3 to OI Case 4-95-070, Fire Watch Manual (2 pages)
<b><u>OI Case 4-95-032</u></b>		
11.	6/26/95	Allegation Assignment Form RIV-95-A-0101 (1 page)
12.	9/11/95	Allegation Assignment Form RIV-95-A-0101 (1 page)
<b><u>OI Case 4-95-004</u></b>		
13.	Undated	Memorandum for R. Wise, EACS/RIV, from W. Ang, DRS/RIV, Subject: Allegation RIV-95-A-0009 (Att.-Plant Support Branch Writeup of Alleger's Concerns) (3 pages)
14.	1/30/95	Allegation Assignment Form RIV-95-A-0009 (1 page)
15.	2/7/95	Allegation Assignment Form RIV-95-A-0009 (1 page)
16.	3/6/95	Allegation Assignment Form RIV-95-A-0009 (1 page) (Att.-Plant Support Branch Writeup of Alleger's Concerns) (3 pages)
17.	4/18/95	Memorandum to R. Wise, EACS/RIV, from W. Ang, DRS/RIV, Subject: Allegation RIV-95-A-0009 (Atts.-Details of D. Pereira's DRS/RIV Inspection Followup, ANO Foam Seal Penetration Checklist) (7 pages)
18.	5/25/95	Memorandum to L. Williamson, OI, from R. Wise, EACS/RIV, Subject: ANO-Alleged Employment Discrimination (OI 4-95-0004) (RIV-95-A-0009) (Atts.-3/1/95 E-mail to T. Gwynn, DRS/RIV, and R. Wise, EACS/RIV, from W. Ang, DRS/RIV, Subject: RIV-95-A-009, Memorandum to R. Wise, EACS/RIV, from W. Ang, DRS/RIV, Subject: Allegation RIV-95-A-0009, PSB Writeup of Alleger's Concerns) (5 pages)
19.	2/20/96	Allegation Assignment Form RIV-95-A-0009 (1 page)
20.	6/10/96	Allegation Assignment Form RIV-95-A-0009 (1 page)
21.	9/11/96	E-mail to G. Sanborn, EACS/RIV, from E. Collins, DNMS/RIV, Subject: ANO-OI-4-95-004 (1 page)

**APPENDIX II  
(continued)  
RECORDS BEING RELEASED IN THEIR ENTIRETY**

<b><u>NO.</u></b>	<b><u>DATE</u></b>	<b><u>DESCRIPTION/(PAGE COUNT)</u></b>
<b><u>OI Case 1-96-033</u></b>		
22.	1/22/97	Draft Letter to K. Monroe, OI, from W. MacFarland, PECO, Subject: Reply to Verbal Request for Information Regarding Fire Protection System Inspection Records Att.-Affidavit (2 pages)
23.	2/7/97	Letter to K. Monroe, OI, from W. MacFarland, PECO, Subject: Reply to Verbal Request for Information Regarding Disciplinary Action Taken Against a Chemistry Technician, Att.-Affidavit (2 pages)
24.	8/15/96	Letter to K. Monroe, OI, from J. C. Rullo, PECO, Subject: Case No. 40-80-96-3522, Att.-Affidavit (3 pages)

**APPENDIX JJ  
RECORDS BEING WITHHELD IN PART**

<b><u>NO.</u></b>	<b><u>DATE</u></b>	<b><u>DESCRIPTION/(PAGE COUNT)/EXEMPTIONS</u></b>
<b><u>OI Case 4-97-003</u></b>		
1.	1/6/97	Exhibit 3 to OI Case 4-97-003, Voluntary Statement of J. Dillard, River Bend (2 pages) EX. 7C
2.	1/7/97	Exhibit 4 to OI Case 4-97-003, Voluntary Statement fo C. Sturdivant (2 pages) EX. 7C
3.	2/26/97	Exhibit 5 to OI Case 4-97-003, Letter to R. Wise, RIV, from R. King, Entergy, Subject: River Bend Station-Unit 1 Docket No. 50-458-2.790 (Att.-Allegation RIV-A-97-0007 Summary) (4 pages) EX. 7C
4.	1/9/97	Report of Investigation Concerning Missed Firewatch Rounds (2 pages) EX. 7C
<b><u>OI Case 3-94-059</u></b>		
5.	1/18/95	Memorandum to an Individual, NRC, from an Individual, OI, Subject: Donald C. Cook Nuclear Power Plant: Alleged Deliberate Falsification of Fire Watch Records (Case No. 3-94-059) (Att.- 1/18/95 OI Report of Investigation 3-94-059, Donald C. Cook Nuclear Power Plant: Alleged Deliberate Falsification of Fire Watch Records) (10 pages) EX. 7C
<b><u>OI Case 1-95-012</u></b>		
6.	2/2/95	Exhibit 2 to OI Case 1-95-012, Allegation Receipt Report-RI-95-A-0029 (Atts.-Combustible Control Permit, 1/30/95-E-mail to T. Teifke, NYPA, from J. Pechacek, NYPA, 2/2/95-Questions and Answers from L. Corey, NYPA (9 pages) EX. 7C
<b><u>OI Case 2-93-030</u></b>		
7.	1/17/94	Exhibit 3 to OI Case 2-93-030, Letter D. Harrison, TVA, from B. Uryc, RII, Subject: RII-93-A-0031 & 96 (Att.-Allegation Evaluation Report) (3 pages) EX. 7C
8.	1/5/96	1/3/96 Letter to E. Merschoff, RII, from R. Kelly, SWEC, Subject: NRC Consideration of Enforcement Action (Atts.-Enforcement Conference Slides, 1/3/96 Letter to G. Huddleston, Attorney, Subject: D. Harrison's Compensation, Copy of Paystub) (11 pages) EX. 7C

APPENDIX JJ  
(continued)  
RECORDS BEING WITHHELD IN PART

<u>NO.</u>	<u>DATE</u>	<u>DESCRIPTION/(PAGE COUNT)/EXEMPTIONS</u>
<u>OI Case 3-94-059</u>		
9.	8/16/94	Allegation Action Plan-RIII-94-A-0118 (Atts.-E-mail to J. Belanger, RIII, from D. Schrum, RIII, Subject: Falsification/Firewatch Tours/D.C. Cook-Reply, Notes of Telecon, Section 3.3 of Inspection Report, 8/2/94 Memorandum to G. Grant, RIII, from D. Funk, Subject: Allegation re: Falsification of Firewatch Records at D.C. Cook (AMS No. RIII-94-A-0118), Allegation Management System Form, Memorandum to D. Funk, RIII, from J. Belanger, RIII, Subject: Potential Falsification of Firewatch Tours at D.C. Cook Plant) (9 pages) EX. 7C
10.	8/22/94	Allegation Action Plan-RIII-94-A-0118 (1 page) EX. 7C
<u>OI Case 3-04-060</u>		
11.	Undated	Draft Inspection Report 50-254/94017 (2 pages) (Portions of both pages outside the scope EX. 5)
12.	09/19/94	Allegation Action Plan-RIII-94-A-0157 (Att.-Email to B. DeFayette, RIII, from C. Miller, RIII, Subject: Allegation of Document Falsification, 9/13/94 E-mail to R. DeFayette, RIII, and D. Funk, RIII, from R. Walton, RIII, Subject: Allegation of Document Falsification, 9/8/94 Letter to T. Hall, Quad Cities, from E. Smith, Fire Marshal, Subject: Investigation of Fire Watch Falsification of Records) (6 pages) EX. 7C
<u>OI Case 3-96-032</u>		
13.	6/18/96	Allegation Action Plan Allegation No. RIII-96-A-0090 (6 pages) EX. 7C
<u>OI Case 4-95-070</u>		
14.	12/11/95	Allegation Assignment Form RIV-95-A-0237 (1 page) EX. 7C
<u>OI Case 1-96-033</u>		
15.	2/19/97	OI Report of Investigation 1-96-033, Limerick Generating Stations Units 1 and 2: Falsification of Fire Protection Surveillance Test Documentation by a PECO Technical Assistant (10 pages) EX. 7C

**APPENDIX JJ  
(continued)  
RECORDS BEING WITHHELD IN PART**

<b>NO.</b>	<b>DATE</b>	<b>DESCRIPTION/(PAGE COUNT)/EXEMPTIONS</b>
16.	9/30/96	Exhibit 4 to OI Case 1-96-033, Memorandum to an individual, PECO, from an individual, PECO, Subject: Security Investigation-Quality Concern 127 Allegation of Falsification of Fire Protection Section Surveillance Test, Limerick (5 pages) EX. 7C
17.	8/13/96	Exhibit 5 to OI Case 1-96-033, an individual's Voluntary Statement to Security, PECO, Att.-7/29/96-Limerick Surveillance Test-Fire Hose Station Visual Inspection (16 pages) EX. 7C
18.	8/16/96	Exhibit 6 to OI Case 1-96-033, an individual's Voluntary Statement to Security, PECO, Atts.-5/29/96, 4/30/96, 6/8/95, 6/29/94 Limerick Surveillance Test-Fire Hose Station Visual Inspection (52 pages) EX. 7C
19.	6/29/95	Exhibit 7 to OI Case 1-96-033, Limerick Surveillance Test-Fire Suppression Water System Spray and Sprinkler (6 pages) EX. 7C
20.	1/23/97	Exhibit 11 to OI Case 1-96-033, Interview Report of an individual, PECO (Atts.-8/20/96-an individual's Statement to Security, PECO, 8/23/95-Limerick Surveillance Test Fire Hose Station Refuel Inspection, PECO Security Zone Tracer for an individual) (21 pages) EX. 7C
21.	1/23/97	Exhibit 12 to OI Case 1-96-033, Interview Report of an individual, PECO (Att.-PECO Security Zone Tracer for an individual (3 pages) EX. 7C
22.	Various	Security Zone Tracer for an individual, PECO (3 pages) EX. 7C
23.	Various	Security Zone Tracer for an individual, PECO (2 pages) EX. 7C
24.	Various	Security Zone Tracer for an individual, PECO (2 pages) EX. 7C
25.	8/14/96	Memorandum to Site Support Services Division, PECO, from an individual, PECO, Subject: Fire Protection Section Issues (2 pages) EX. 7C
26.	8/14/96	Memorandum to Site Support Services Division, PECO, from an individual, PECO, Subject: Followup on Fire Protection Section Issues (1 page) EX. 7C

**APPENDIX JJ  
(continued)  
RECORDS BEING WITHHELD IN PART**

<b><u>NO.</u></b>	<b><u>DATE</u></b>	<b><u>DESCRIPTION/(PAGE COUNT)/EXEMPTIONS</u></b>
27.	8/21/96	Memorandum to Site Support Services Division, PECO, from an individual, PECO, Subject: Fire Protection Investigation (1 page) EX. 7C
28.	9/13/96	Draft Letter to J. Hinman, Bechtel, from an individual, PECO, Subject: Performance of an individual (1 page) EX. 7C
29.	Undated	Surveillance Test (9 pages) EX. 7C

**APPENDIX KK  
RECORDS BEING WITHHELD IN THEIR ENTIRETY**

<b><u>NO.</u></b>	<b><u>DATE</u></b>	<b><u>DESCRIPTION/(PAGE COUNT)/EXEMPTIONS</u></b>
<b><u>OI Case 4-95-004</u></b>		
1.	2/6/96	Exhibit 14 to OI Case 4-95-004, E-mail to W. Brown, RIV, from S. Lewis, OGC, Subject: Question-Reply (2 pages) <b>EX. 5 Attorney-Client</b>
<b><u>OI Case 1-96-033</u></b>		
2.	9/10/96	Exhibit 8 to OI Case 1-96-033, Draft Letter to an individual, PECO, from an individual, PECO, Subject: Termination (2 pages) <b>EX. 7C</b>
3.	11/6/96	Exhibit 9 to OI Case 1-96-033, Letter to an individual, PECO, from an individual, PECO, Subject: Reinstatement (1 page) <b>EX. 7C</b>
4.	9/10/96	Exhibit 13 to OI Case 1-96-033, Memorandum to an individual, PECO, from an individual, PECO, Subject: Oral Warning (1 page) <b>EX. 7C</b>

**EXHIBIT 2**

II/1

**EXHIBIT**



ENERGY

CONDITION REPORT RIVER BEND STATION

PAGE 1 OF FORM I, REVISION 5

CONDITION REPORT INITIATION (PRINT/TYPE, USE BLACK INK ONLY)

1. GENERAL INFORMATION:

PROCESS SYSTEM CODE AND DESCRIPTION: Fire Watch Rounds
LOCATION (BLDG/ELEV): N/A
QUALITY CLASS: N/A
INITIATOR (NAME/DEPT): JOSEPH T. RILLARD / SECURITY

COMPONENT TAG NUMBER/CODE: N/A
DISCOVERY (DATE/TIME): 01-06-97 / 0800
EXTENSION: 4160

2. CONDITION DETECTION:

- Checkboxes for MAJ NO., RWP NO., OPERATIONAL ABNORMALITY, PREVENTIVE MAINTENANCE, QA SURVEILLANCE NO., CORRECTIVE MAINTENANCE, OBSERVATION, ISI, IST, SURVEILLANCE TESTING, SPECIAL INSPECTION, AUDIT NO., ALARM, OTHER, TECH SPEC, IOCFR, PROC. NO., VENDOR RELATED.

3. DESCRIPTION OF CONDITION:

A. CONDITION DESCRIPTION: CONTRACTOR Firewatch Person failed to complete Hourly Firewatch tour through ALL assigned Buildings. Auxiliary Building tour completed. Fuel Building and Tunnel NOT completed.

INDIVIDUAL STATED THAT HE DID NOT FEEL WELL AND OFFERED NO EXCUSE FOR NOT COMPLETING HIS REQUIRED TOUR.

C. IMMEDIATE ACTIONS TAKEN: Other Firewatch personnel assigned to complete required Firewatch tours. Employee suspended pending investigation.

B. RECOMMENDED CORRECTIVE ACTION: Reemphasize to ALL Firewatch personnel the requirement and importance of completing required tours.

E. DEPARTMENTAL/PERSONNEL CONTACTS AND ADDITIONAL REFERENCES:

HOWARD HUTCHERNS - Joe D. HARRIS (4160) - Dave Lovelace

4. DOCUMENTATION INITIATED: N/A MAJ MR OTHER

5. ORIGINATOR REQUESTS CLOSED COPY OF CONDITION REPORT EXHIBIT 2

OPERABILITY ASSESSMENT IMMEDIATE REPORTABILITY DETERMINATION  
(PRINT/TYPE, USE BLACK INK ONLY)

DATE/TIME OF NOTIFICATION: 1/6/97 @ 9:30

PLANT STATUS AT TIME OF CONDITION NOTIFICATION

PLANT MODE:  1  2  3  4  5 REACTOR POWER: MWT 2894 MWE 1014  
REACTOR LEVEL: 36 REACTOR PRESSURE 1025 CORE FLOW S7 X 10-6 LB/HR

ACTIVITY IN PROGRESS: 100% POWER, STEADY STATE OPS

DESCRIBE ANY IMMEDIATE CORRECTIVE ACTION TAKEN OR PLANT RESPONSE TO CONDITION  
See 3.c; initiated CR.

OPERABILITY ASSESSMENT

COMPLETE THE FOLLOWING IF AN OPERABILITY ASSESSMENT IS REQUIRED PER RBNP-0078. IF AN ASSESSMENT IS NOT REQUIRED, DESCRIBE WHY NOT IN THE BASIS SECTION BELOW.

EQUIPMENT/SYSTEM BEING ASSESSED: n/a

EQUIPMENT/SYSTEM'S RELATED TECH SPEC (S) n/a

DID THIS CONDITION CAUSE THE ENTRY INTO A TECH SPEC ACTION STATEMENT?

LCO NO: N/A

NO  YES n/a TECH SPEC ACTION STATEMENT N/A DATE ENTERED

N/A TIME ENTERED

EFFECT OF THIS CONDITION ON EQUIPMENT/SYSTEM OPERABILITY

EQUIPMENT REMAINS OPERABLE  SYSTEM REMAINS OPERABLE  
 EQUIPMENT IS INOPERABLE  SYSTEM IS INOPERABLE

WAS REDUNDANT EQUIPMENT VERIFIED OPERABLE:

N/A  YES  NO (DESCRIBE VERIFICATION METHOD IN 'BASIS' BELOW)

IMMEDIATE REPORTABILITY DETERMINATION

IS IMMEDIATE NRC NOTIFICATION REQUIRED?  NO  YES

IF YES:  1-HOUR REPORT  4-HOUR REPORT  24-HOUR REPORT  
DATE: N/A AND TIME: N/A OF REPORT

CFR REQUIREMENT: N/A

NAME OF PERSON MAKING REPORT: N/A

NAME OF PERSON REPORT MADE TO: N/A

NRC EVENT NO: NA

BASIS: OPERABILITY ASSESSMENTS USING ENGINEERING JUDGEMENT MUST BE SUBSTANTIATED

Plant equipment is not affected; no Operability Assessment is required. ~~Reportability can be determined.~~ <sup>B1103</sup>  
Per DAVID LORFING, THIS IS NOT REPORTABLE TO NRC. <sup>10-17</sup>  
B1103

ASSESSMENT PERFORMED BY: W. J. Lewis KCN: 0703 DATE: 1-06-97

SHIFT SUPERINTENDENT APPROVAL: Beryl Duff 1103 KCN: 1103 DATE: 1-6-97

# 1-95-012

ALLEGATION DISPOSITION RECORD

Rev. 2 10/5/94

Site: FITZPATRICK

Section Chief (AOC): COWGILL

Allegation No.: RI-95-A-0029

Date Received: 2/2/95

Acknowledged: N/A

Receipt Report to SAC: YES

CONFIDENTIALITY GRANTED: Yes No (N/A)

OI Informed: YES

IS THERE A HARASSMENT/DISCRIMINATION ISSUE:

Yes (No)

(If yes, complete H&ID section on reverse)

DOES THE ALLEGATION INVOLVE POTENTIAL WRONGDOING:

(Yes) No

DOES THE ALLEGATION HAVE POLITICAL IMPLICATIONS:

Yes (No)

DOES THE ALLEGATION REQUIRE RESOURCES TO RESOLVE

WHICH CAN NOT BE OBTAINED BY THE AOC:

(Yes) No

If yes to any of the above, the allegation needs to go to an Allegation Panel. Otherwise, document disposition actions below.

ALLEGATION PANEL (AP) DECISIONS

Date: 2/22/95

Previous APs on issue: Yes / (No)

Chair - COOPER

Branch Chief - COWGILL

Section Chief (AOC) - COWGILL

SAC - VITO

(Others) - URBAN, MAJEN

OI Rep. - Letts

DISPOSITION ACTIONS: (State specific action required for closure (including special concurrences), responsible person, ECD and expected closure documentation)

1) RESIDENTS F/U FIRE PROTECTION ADMIN. CONTROLS AND CORRECTIVE ACTIONS; ADDRESS IN NEXT REPORT

Responsible Person: COOK ECD: 4/95

Closure Documentation: \_\_\_\_\_ Completed: \_\_\_\_\_

2) ~~OI/OB INVOLVEMENT FOR ENFORCEMENT ACTIONS IF NECESSARY~~

Responsible Person: \_\_\_\_\_ ECD: \_\_\_\_\_

Closure Documentation: \_\_\_\_\_ Completed: \_\_\_\_\_

3) OI:RI has opened a case no. on issue (1-95-012)

Responsible Person: \_\_\_\_\_ ECD: \_\_\_\_\_

Closure Documentation: \_\_\_\_\_ Completed: \_\_\_\_\_

4) \_\_\_\_\_

Responsible Person: \_\_\_\_\_ ECD: \_\_\_\_\_

Closure Documentation: \_\_\_\_\_ Completed: \_\_\_\_\_

Safety Significance Assessment: low-moderate; issue is of low safety significance but significance could be raised by potential willful action

II/2

# ALLEGATION REVIEW PANEL

DATE OF ARP: 5/27/93 ALLEGATION NO. RII-93-A-0096  
DATE RECEIVED: 5/25/93 PANEL NO. 1 2 3 4  
NAME OF ALLEGER: DOUGLAS W. HARRISON BC/SC:  
SUBJECT: FIREWATCH ACTIVITIES

## FACILITY NAME:

<input type="checkbox"/> B&W	<input type="checkbox"/> BELLEFONTE	<input checked="" type="checkbox"/> <u>BROWNS FERRY</u>	<input type="checkbox"/> BRUNSWICK	<input type="checkbox"/> CATAWBA	
<input type="checkbox"/> CRYSTAL RIVER	<input type="checkbox"/> FARLEY	<input type="checkbox"/> GRAND GULF	<input type="checkbox"/> HARRIS		<input type="checkbox"/> HATCH
<input type="checkbox"/> MCGUIRE	<input type="checkbox"/> NFS	<input type="checkbox"/> NORTH ANNA	<input type="checkbox"/> OCONEE	<input type="checkbox"/> ROBINSON	
<input type="checkbox"/> ST. LUCIE	<input type="checkbox"/> SEQUOYAH	<input type="checkbox"/> SUMMER	<input type="checkbox"/> SURRY		
<input type="checkbox"/> TURKEY POINT	<input type="checkbox"/> VOGTLE	<input type="checkbox"/> WATTS BAR			
<input checked="" type="checkbox"/> <u>STONE &amp; WEBSTER</u>					

<u>TYPE:</u>	<u>FUNCTIONAL AREA:</u>	<u>SOURCE</u>
<input checked="" type="checkbox"/> A. REACTOR	<input type="checkbox"/> A. OPERATION	<input type="checkbox"/> A. CONT EMPLOYEE
<input type="checkbox"/> B. VENDOR	<input type="checkbox"/> B. CONSTRUCTION	<input type="checkbox"/> B. FORMER EMPL
<input type="checkbox"/> C. MATERIAL NO.	<input type="checkbox"/> C. SAFEGUARDS	<input type="checkbox"/> C. ANONYMOUS
<input type="checkbox"/> D. SAFEGUARDS	<input type="checkbox"/> D. TRANSPORTATION	<input checked="" type="checkbox"/> D. LIC EMPLOYEE
<input type="checkbox"/> E. OTHER	<input type="checkbox"/> E. EMER PREP	<input type="checkbox"/> E. NEWS MEDIA
	<input checked="" type="checkbox"/> F. ONSITE H&S	<input type="checkbox"/> F. ORGANIZATION
	<input type="checkbox"/> G. OFFSITE H&S	<input type="checkbox"/> G. OTHER
	<input type="checkbox"/> H. OTHER	

NO. OF CONCERNS: 1 OI YES NO DOL YES NO REPANEL YES NO  
CONFIDENTIALITY GRANTED YES NO SCHEDULED COMPL. DATE: 08/25/93

## ACTION:

ASSIGNED TO: PB1 PB2 PB3 RPB4 NMSS RPEP SGA EICS ENG OI

## PANEL ATTENDEES:

ORA	DRP	DRS	DRSS	OI
<input type="checkbox"/> EBNETER	<input type="checkbox"/> MERSCHOFF	<input type="checkbox"/> GIBSON	<input type="checkbox"/> STOHR	<input type="checkbox"/> VORSE
<input type="checkbox"/> REYES	<input type="checkbox"/> JOHNSON	<input type="checkbox"/> JULIAN	<input type="checkbox"/> MALLET	<input type="checkbox"/> TATE
<input type="checkbox"/> JENKINS	<input type="checkbox"/> VERRELLI	<input type="checkbox"/> PEEBLES	<input type="checkbox"/> CLINE	
<input type="checkbox"/> EVANS	<input type="checkbox"/> SINKULE	<input type="checkbox"/>	<input type="checkbox"/> COLLINS	
<input type="checkbox"/> DEMIRANDA	<input type="checkbox"/> HERDT	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/> IGNATONIS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/> TROJANOWSKI	<input type="checkbox"/>	<input type="checkbox"/>		
<input type="checkbox"/> SLACK	<input type="checkbox"/>	<input type="checkbox"/>		

*Handwritten initials: H/B*



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION II  
101 MARIETTA STREET, N.W., SUITE 2900  
ATLANTA, GEORGIA 30323-0199

2-93-030

October 18, 1995

EA 95-190

Stone & Webster Engineering Group  
ATTN: Mr. R. E. Kelly  
President  
245 Summer Street  
Boston, MA 02240

SUBJECT: PREDECISIONAL ENFORCEMENT CONFERENCE

Dear Mr. Kelly:

On August 22, 1995, the Secretary of Labor issued a Decision and Order which found that Stone and Webster Engineering Group discriminated against Mr. Douglas Harrison (DOL Case 94-ERA-44) when Mr. Harrison was demoted because he had raised concerns related to firewatch requirements. Mr. Harrison was employed as an ironworker general foreman at Tennessee Valley Authority's (TVA) Browns Ferry Nuclear Plant. In addition, the Secretary of Labor found that the removal of Mr. Harrison to an outside work crew was also discriminatory and that Mr. Harrison's discussion with other ironworkers on the lack of response to the fire protection concerns was a protected activity. A copy of the Secretary of Labor's decision is enclosed (Enclosure 1).

The Secretary of Labor concluded that Stone & Webster wrongfully demoted Mr. Harrison as a result of his protected activity and reassigned Mr. Harrison to an outside work crew when he discussed his concerns with other workers. The NRC Office of Investigation (OI) conducted an inquiry into this case and based on the preliminary Department of Labor decisions and the TVA Office of Inspector General report concluded that the allegations of discrimination were not substantiated. Our letter to TVA dated May 17, 1995, transmitted the OI synopsis and indicated that no further action was planned on the case. However, because of the Secretary of Labor Decision and Order issued on August 22, 1995, the acts of discrimination that DOL found to have occurred against Mr. Harrison constitute an apparent violation of 10 CFR 50.7 which prohibits discrimination against an employee who engages in protected activities such as providing an employer information about alleged violations of NRC requirements.

Based on the Secretary of Labor's decision in this case, the apparent violation is being considered for escalated enforcement action in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (Enforcement Policy), (60 FR 34381; June 30, 1995/NUREG-1600). Accordingly, no Notice of Violation is presently being issued for this finding. Please be advised that the number and characterization of the apparent violation described above may change as a result of further NRC review.

A joint predecisional enforcement conference to discuss the apparent violation has been scheduled with Stone & Webster, TVA and Mr. Steve Ehele, the Stone & Webster supervisor involved in this case, for October 30, 1995, at 1:00 p.m. in the Region II office. The predecisional enforcement conference schedule was discussed in a telephone call between Mr. Brad Dodson of your staff and

THS

Mr. Mark Lesser of this office on October 6, 1995. A proposed conference agenda is enclosed (Enclosure 2). The predecisional enforcement conference will be closed to public observation and transcribed.

The decision to hold a predecisional enforcement conference does not mean that the NRC has determined that a violation has occurred or that enforcement action will be taken. This conference is being held to obtain information to enable the NRC to make an enforcement decision, such as a common understanding of the facts, root causes, missed opportunities to identify the apparent violation sooner, corrective actions, significance of the issues and the need for lasting and effective corrective action. In addition, this is an opportunity for you to point out any disagreement with the facts and findings presented in the Secretary of Labor decision and for you to provide any information concerning your perspectives on 1) the severity of the apparent violation, 2) the application of the factors that the NRC considers when it determines the amount of a civil penalty that may be assessed in accordance with Section VI.B.2 of the Enforcement Policy, and 3) any other application of the Enforcement Policy to this case, including the exercise of discretion in accordance with Section VII. In particular, we expect you to address the basis for the adverse employment action taken against Mr. Harrison.

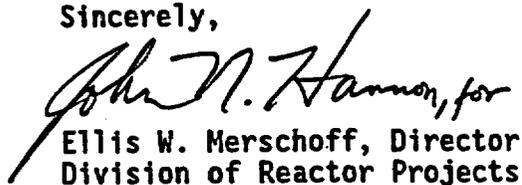
We are also concerned with the potential chilling effect that may have resulted from Mr. Harrison's demotion and the recent Secretary of Labor decision. Therefore, notwithstanding the information requested above and whether or not you agree with the Secretary of Labor decision, we expect you to address the actions taken or planned to assure that this adverse employment action does not have a chilling effect on other licensee or contractor employees raising perceived safety concerns. In addition, you should address your corrective action to ensure that Stone & Webster managers are aware of their responsibilities to provide a work environment in which all employees may freely identify safety concerns without fear of retaliation or discrimination.

You will be advised by separate correspondence of the results of our deliberations on this matter. No response regarding the apparent violation is required at this time.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

Should you have any questions concerning this enforcement conference, please contact Mr. Bruno Uryc at (404) 331-5505 or Mr. Mark Lesser at (404) 331-0342.

Sincerely,

  
Ellis W. Merschoff, Director  
Division of Reactor Projects

Docket No. 9999

Enclosures: (See page 3)

cc w/encl: (See page 3)

Stone & Webster Engineering Group 3

- Enclosures: 1. Secretary of Labor Decision  
dated August 22, 1995  
2. Proposed Predecisional Enforcement  
Conference Agenda

cc w/encls:

Stone & Webster Engineering Group  
ATTN: Mr. Brad Dodson  
Vice President, Nuclear Operations  
245 Summer Street  
Boston, MA 02240

cc w/o encls:

Tennessee Valley Authority  
ATTN: Mr. Oliver D. Kingsley, Jr.  
President, TVA Nuclear and  
Chief Nuclear Officer  
6A Lookout Place  
1101 Market Street  
Chattanooga, TN 37402-2801

**PROPOSED PREDECISIONAL ENFORCEMENT CONFERENCE AGENDA**

**STONE & WEBSTER ENGINEERING GROUP  
TENNESSEE VALLEY AUTHORITY**

**BROWNS FERRY NUCLEAR PLANT**

**October 30, 1995  
1:00 p.m.**

- I. INTRODUCTION AND OPENING REMARKS**  
S. D. Ebnetter, Regional Administrator
- II. DISCUSSION OF THE ENFORCEMENT POLICY**  
B. Uryc, Director  
Enforcement and Investigation Coordination Staff
- III. OVERVIEW**  
Mr. Ebnetter
- IV. APPARENT VIOLATION AND NRC CONCERNS**  
E. Merschoff, Director  
Division of Reactor Projects
- V. LICENSEE PRESENTATION**
- VI. STONE & WEBSTER ENGINEERING GROUP PRESENTATION**
- VII. STATEMENT OF S. EHELE**  
\* \* \* BREAK \* \* \*
- VIII. NRC FOLLOWUP QUESTIONS**  
Mr. Merschoff
- IX. CLOSING**  
Mr. Ebnetter

Distribution w/encl 2:

PUBLIC  
 JTaylor, EDO  
 JMilhoan, DEDR  
 SEbnetter, RII  
 LChandler, OGC  
 JGoldberg, OGC  
 EJulian, SECY  
 BKeeling, CA  
 Enforcement Coordinators  
     RI, RIII, RIV  
 JLieberman, OE  
 JGray, OE  
 OE:EA File (B. Summers, OE) (2)  
 DRosano, OE  
 EHayden, OPA  
 DDandois, OC  
 LTemper, OC  
 GCaputo, OI  
 EJordon, AEOD  
 LNorton, OIG  
 BUyrc, RII  
 WMcNulty, RII  
 KClark, RII  
 RTrojanowski, RII  
 AGibson, RII  
 MLesser, RII  
 JWilliams, NRR  
 FHebdon, NRR  
 JJohnson, RII  
 SShaeffer, RII  
 CEvans, RII  
 LWatson, RII  
 GHallstrom, RII  
 IMS:RII  
 NUDOCS

NRC Senior Resident Inspector  
 U.S. Nuclear Regulatory Commission  
 10833 Shaw Road  
 Athens, AL 35611

**\*SEE PREVIOUS PAGE FOR CONCURRENCE**

SEND TO PUBLIC DOCUMENT ROOM?							
			YES	NO			
OFFICE	RII:DRP	RII:DRP	RII:ORA	RII:EICS	RII:ORA	RII:ORA	
SIGNATURE						X SEbnetter	
NAME	*MLesser	*EMerschhoff	*CEvans	*BUyrc	*LReyes		
DATE	10 / / 85	10 / / 85	10 / / 85	10 / / 85	10 / / 85	10/16 /85	
COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	(YES) NO	

Distribution w/encl 2:

- PUBLIC
- JTaylor, EDO
- JMilhoan, DEDES
- SEbnetter, RII
- LChandler, OGC
- JGoldberg, OGC
- EJulian, SECY
- BKeeling, CA
- Enforcement Coordinators
- RI, RIII, RIV
- JLieberman, OE
- JGray, OE
- OE:EA File (B. Summers, OE) (2)
- DRosano, OE
- EHayden, OPA
- DDandois, OC
- LTemper, OC
- GCaputo, OI
- EJordon, AEOD
- ~~Williams, OIG~~ — 016
- BUyrc, RII
- WMcNulty, RII
- KClark, RII
- RTrojanowski, RII
- AGibson, RII
- MLesser, RII
- JWilliams, NRR
- FHebdon, NRR
- JJohnson, RII
- SShaeffer, RII
- CEvans, RII
- LWatson, RII
- GHallstrom, RII
- IMS:RII
- NUDOCS

DEAR.

NRC Senior Resident Inspector  
 U.S. Nuclear Regulatory Commission  
 10833 Shaw Road  
 Athens, AL 35611

SEND TO PUBLIC DOCUMENT ROOM?		YES		NO					
OFFICE	RII:DRP	RII:DRP	RII:DRS	RII:ORA	RII:EICS	RII:ORA	RII:ORA	RII:ORA	RII:ORA
SIGNATURE	<i>ML</i>	<i>EM</i>		<i>CE</i>	<i>BU</i>	<i>LR</i>			
NAME	MLesser	EMerschhoff		CEvans	BUyrc	LReyes			SEbnetter
DATE	10/12/85	10/13/85	10 / / 85	10/15/85	10/13/85	10/11/85			10 / / 85
COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO

Distribution w/encl 2:

- PUBLIC
- JTaylor, EDO
- JMilhoan, DEOS DENR
- SEbnetter, RII
- LChandler, OGC
- JGoldberg, OGC
- EJulian, SECY
- BKeeling, CA
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- JLieberman, OE
- JGray, OE
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- DDandois, OC
- LTemper, OC
- GCaputo, OI
- EJordon, AEOD
- ~~DWilliams, OIG~~ 1016
- BUyrc, RII
- WMcNulty, RII
- KClark, RII
- RTrojanowski, RII
- AGibson, RII
- MLesser, RII
- JWilliams, NRR
- FHebdon, NRR
- JJohnson, RII
- SShaeffer, RII
- CEvans, RII
- LWatson, RII
- GHallstrom, RII
- IMS:RII
- NUDOCS

NRC Senior Resident Inspector  
 U.S. Nuclear Regulatory Commission  
 10833 Shaw Road  
 Athens, AL 35611

SEND TO PUBLIC DOCUMENT ROOM?								YES	NO
OFFICE	RII:DRP	RII:DRP	RII:DRS	RII:ORA	RII:EICS	RII:ORA	RII:ORA		
SIGNATURE	<i>ML</i>	<i>EM</i>		<i>CE</i>	<i>BU</i>	<i>LR</i>	<i>SE</i>		
NAME	MLesser	EMerschoff		CEvans	BUyrc	LRoyes	SEbnetter		
DATE	10/12/95	10/13/95	10/ /95	10/15/95	10/13/95	10/14/95	10/ /95		
COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION III  
799 ROOSEVELT ROAD  
GLEN ELLYN, ILLINOIS 60137

December 8, 1992

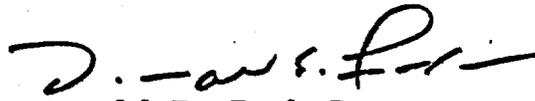
MEMORANDUM FOR: Charles E. Norelius, Director, Division of  
Radiation Safety and Safeguards

FROM: Donald E. Funk Jr., Office Allegation  
Coordinator

SUBJECT: ALLEGATION RE: EMPLOYMENT DISCRIMINATION AT  
THERMAL SCIENCE, INC.  
(AMS NO. RIII-92-A-0139)

On December 9, 1992, this matter was discussed with E. T. Pawlik of the Office of investigations Region III Field Office, and it was concluded that investigative effort by OI:RIII may be warranted at this time for the reason given below. Should additional facts or information relating to possible wrongdoing concerning this allegation become available, please notify me promptly.

This allegation will continue to be carried as "open" in the Allegation Management System pending final resolution/closeout by your Division.

  
Donald E. Funk Jr.  
Office Allegation Coordinator

Attachments:

1. AMS Form
2. 11/25/92 DOL ltr

cc w/attachments:

RAO:RIII  
OI:RIII  
J. A. Grobe

**BASIS:** Since wrongdoing was alleged, employment discrimination, an allegation review board shall be convened within 15 workdays of agency receipt of the information (December 21, 1992).

III/6

ALLEGATION MANAGEMENT SYSTEM

ALLEGATION NUMBER - R111-92-A-0139

RUN DATE: 12/08/92

BUCKET/FACILITY/UNIT: / THERMAL SCIENCE, INC. /  
BUCKET/FACILITY/UNIT: / /  
BUCKET/FACILITY/UNIT: / /  
BUCKET/FACILITY/UNIT: / /

ACTIVITY TYPES - MATERIALS

MATERIAL LICENSES -

FUNCTIONAL AREAS - OTHER

EMPLOYMENT DISCRIMINATION

DESCRIPTION - EMPLOYMENT DISCRIMINATION

CONCERNS -

1

SOURCE - DOL

CONFIDENT - NO

RECEIVED - 921130 BY - RW DEFAYETTE / RAO

STATION OFFICE CONTACT - GL SHEAR

RESPONSIBLE PGM OFFICE - M VIOLATION SECTION 210 ALLEGED - YES

STATUS - OPEN SCHED COMPLETION - 930330 DATE CLOSED -

ALLEGATION SUBSTANTIATED - ALLEGER NOTIFIED -

DISCIPLINARY ACTION - NO OI REPORT NUMBER -

REMARKS - RECEIPT DOL 11/25/92 LTR.

DIVISION ASSIGNED: DRSS(INFO) DOL  
RELATED ALLEGATION FILE(S): N  
ACTION PLAN SUBMITTED: N  
ALLEGATION REVIEW BOARD: N  
RECOORDINATE W/OI: Y  
KEYWORD: DOL

ENTERED SYSTEM - 921208 CLOSED SYSTEM -

RECORD CHANGED - 921208



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION III  
799 ROOSEVELT ROAD  
GLEN ELLYN, ILLINOIS 60137

December 18, 1992

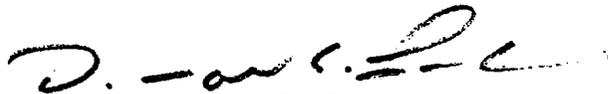
MEMORANDUM FOR: Eugene T. Pawlik, Director, Office of  
Investigations Field Office, Region III

FROM: Donald E. Funk Jr., Office Allegation  
Coordinator

SUBJECT: ALLEGATION RE: EMPLOYMENT DISCRIMINATION AT  
THERMAL SCIENCE, INC.

On December 14, 1992, I verbally notified you of an alleged complaint of employment discrimination against Thermal Science, Inc. We also discussed that a review by the Division of Radiation Safety and Safeguards determined that the named company was not a Region III licensee. At that time you requested that I forward information concerning the complaint to you for your review. Attached are the two letters received from DOL concerning the complaint for whatever action you deem appropriate.

As of December 14, 1992, Region III has closed its file concerning the referenced subject.

  
Donald E. Funk Jr.  
Office Allegation Coordinator

Attachments:

1. November 25, 1992, DOL letter
2. December 15, 1992, DOL letter

III 17

August 30, 1996

MEMORANDUM TO: *GE* Geoffrey E. Grant, Director, Division of Reactor Safety  
FROM: Donald E. Funk Jr., Office Allegation Coordinator  
SUBJECT: OI REPORT OF INTERVIEW D. C. COOK: ALLEGED FALSIFICATION OF  
FIREWATCH LOGS (OI CASE NO. 3-96-032)  
(AMS NO. RIII-96-A-0090)

By memorandum dated August 29, 1996, the Office of Investigations has forwarded their Report of Interview of the above subject to Region III and a copy is enclosed for evaluation by your staff. After review DRS should notify the OAC of its readiness to convene an Allegation Review Board (ARB) within 30 days of the date of this memorandum. At the ARB the Division should be prepared to discuss its decision whether further OI involvement is requested and if so at what priority, ie... High, Normal, or Low.

Attachment: As stated

cc w/attachment:  
B. Berson  
R. Gardner

cc w/o attachment:  
OI:RIII

III/8

Case file

# ~~ALLEGATION~~ ASSIGNMENT FORM

~~Allegation~~ Number: **RIV-95-A-0237**

Licensee/Facility or Location: **WATERFORD - 3**

Discussed at ARP meeting on: **4/30/96**

Assigned to: **DRP, DRS, DNMS, SAC** Branch:

OI involvement?      OI tracking number:

*Allegation Summary: The initial ~~allegations~~ were: (1) firewatch was directed to relocate a watchman key but refused because it would have violated a procedure; and (2) after the firewatch refused to perform the task, he was terminated (employment discrimination). OI concluded that the individual was terminated for refusing to comply with his supervisor's instructions. The ~~allegation~~ that the directed activity would have violated a site procedure was not substantiated. OE has reviewed the OI conclusions and determined that enforcement action is not appropriate.*

ARP instructions/guidance:

ARP Chairman: \_\_\_\_\_ Date: \_\_\_\_\_

~~Allegation~~ Resolution Plan (return to the SAC within 10 days of ARP meeting):

*ARP recommends closure -*

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Submitted by: \_\_\_\_\_ Date: \_\_\_\_\_

cc: ~~Allegation~~ File. ARP Meeting File. OI

*II/9*

EXHIBIT 3

II/10

EXHIBIT

6.0 PROCEDURE

6.1 GENERAL

- 6.1.1 Fire Watchers shall have fire extinguishing equipment readily available (when required) and be trained in its use, including practice on test fires.
- 6.1.2 Fire Watchers shall be familiar with facility layout and procedures for sounding an alarm in the event of a fire.
- 6.1.3 Fire Watchers shall be alert for fires in all exposed areas (i.e., area of work activity or area of impairment), and try to extinguish fires only when in the capacity of their equipment and training, or otherwise sound the alarm immediately.
- 6.1.4 Ignition Source fire watch activities shall be maintained for a minimum of 30 minutes following termination of Hot Work activities, to allow all materials to cool sufficiently.
- 6.1.5 During performance of fire watch duties the Fire Watcher may have no simultaneous duties that could detract from the fire watch function.
- 6.1.6 Authorization for activation and deactivation of the fire watch shall be obtained from the SS/CRS.
- 6.1.7 The associated Fire Protection Impairment number(s) shall be noted on Attachment 7.1, Fire Watch Log so as to allow cross reference to FP-001-015, Fire Protection System Impairments.

# ALLEGATION ASSIGNMENT FORM



Allegation Number: RIV-95-A-0101

Licensee/Facility or Location: WASHINGTON NUCLEAR POWER-2

Discussed at ARP meeting on: 6/26/95

Assigned to: DRP, DRS, DRSS, SAC Branch:

OI involvement? OI tracking number:

*Allegation Summary: During a May 1995 inspection, NRC inspectors on a plant tour identified that a fire watch did not remain in the area for 30 minutes following the completion of "hot work" as required. When the inspectors questioned an individual who had previously performed the hot work about the fire watch, he indicated that he had relieved the fire watch. However, this individual was not in clear view of the area to perform the fire watch responsibilities. The licensee has obtained three signed statements that attest to the presence of the fire watch, although the inspectors did not see the fire watch. One of the statements is from the individual who had informed the inspectors that he had assumed the duties of the fire watch.*

ARP instructions/guidance:

ARP Chairman: \_\_\_\_\_ Date: \_\_\_\_\_

Allegation Resolution Plan (return to the SAC within 10 days of ARP meeting):

*DRP-SAC to ask licensee to respond to staff's concern that there are conflicts in stories - with what RI's saw and what licensee low level employee - no safety significance possible 100% 18 USC - said.*

Submitted by: \_\_\_\_\_

Date: \_\_\_\_\_

cc: Allegation File, ARP Meeting File, OI

*II/11*

**ALLEGATION ASSIGNMENT FORM**

1  
- 37

**Allegation Number: RIV-95-A-0101**

**Licensee/Facility or Location: WASHINGTON NUCLEAR POWER 2**

**Discussed at ARP meeting on: 9/11/95**

**Assigned to: DRP, DRS, DRSS, SAC Branch: E**

**OI involvement? YES OI tracking number: 4-95-032**

**Allegation Summary: During a 5/95 inspection, NRC identified that a fire watch did not remain in the work area for 30 minutes following the completion of "hot work" as required. The violation was cited in IR 50-397/95-15. The licensee responded to the NOV on 8/1/95 and contested the violation. DRP is preparing a response to the licensee's reply. OI has requested the ARP review the current status to determine if the contractor employees should be interviewed before they leave the site.**

**ARP instructions/guidance: No further action by OI (low priority). DRP will close the issue through the response to the licensee's reply to the violation.**

**ARP Chairman: W. D. Johnson** W.D. Johnson **Date: 9/13/95**

**Allegation Resolution Plan (return to the SAC within 10 days of ARP meeting):**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Submitted by:** \_\_\_\_\_ **Date:** \_\_\_\_\_  
**cc: Allegation File, ARP Meeting File, OI**

*II/12*

MEMORANDUM FOR : R. WISE, Allegation Coordinator  
THRU : T. P. GWYNN, Division Director, DRS  
FROM : W. P. ANG, Plant Support Branch Chief, DRS  
SUBJECT : ALLEGATION RIV-95-A-0009

On February 28, 1995, L. Williamson, OI, provided the Plant Support Branch copy of the transcript of the OI interview of the ~~alleged~~ for the ~~allegation~~. The interview was conducted by OI on February 8, 1995. Support Branch (P. Qualls and W. Ang) reviewed the OI interview to identify any safety concerns expressed by the ~~alleged~~. Attached of information provided by the ~~alleged~~ during the interview, the ~~alleged~~ concerns noted during the review of the transcript by the Support Branch, and recommended action for those concerns.

W. P. ANG

ATTACHMENT - ALLEGATION RIV-95-A-0009

11/13

SUMMARY OF CONCERNS NOTED BY PSB DURING REVIEW  
OI ALLEGER INTERVIEW

1. Controlled Work Package (CWP) Checklist step signed as com work had not been completed. Pages referenced below are t pages.

Pg.s 11,12,&13

"Electricians had run some new cables through conduits tha the wall.." that emptied out into a junction box located a the floor, on the south wall of the ANO Unit 1 control roo 1993 fall outage. The ~~Alleger~~ an asbestos worker, worked penetration seals for the conduit. At the end of the shif (name in transcript) was "not through with this particular penetrations in this junction box and the cover was off. several screws to put it on and take it off, and I had som the box."

Pgs. 13 & 14

CWP Checklist required "Reinstall items removed for access penetration" and "Clean up all your debris and remove scaf

Bechtel Field Engineer (name in transcript) told ~~Alleger~~ t sign for completion of the above noted steps even though n complete.

~~Alleger~~ stated that "he informed the Bechtel Field Enginee would give me maybe 15 or 20 minutes the next morning, tha time to finish that, and I could go ahead and sign the stu

Pg. 17

~~Alleger~~ stated that his Superintendent (name in transcript CWP Checklist step as having been completed.

Pg. 20

~~Alleger~~ stated that he looked at the junction box the next that "the work was exactly as I had left it the afternoon Nothing additional had been done to it."

**PSB RECOMMENDED ACTION :**

OI DETERMINE NEED TO INVESTIGATE FOR POTENTIAL FALSIFICATI CHECKLIST RECORD.

2. Potential Incomplete Safety Significant Work

As noted in 1 above, housekeeping in and around the juncti closure of the junction box cover, was incomplete at the t left the are work area. This work was performed in Septem of 1993. No allegation was made regarding the adequacy of penetration seals. The ~~alleged~~ incomplete work is not of significance, but nonetheless, was an apparent incomplete work activity.

**PSB RECOMMENDED ACTION:**

PSB VISUALLY INSPECT WORK AREA FOR SIGNS OFF INCOMPLETE WO

ADEQUACY OF INSTALLATION OF JUNCTION BOX COVER AND AREA HO THIS MOST LIKELY SHOULD HAVE ALREADY BEEN CORRECTED.

3. Potential for Signing Off Incomplete Safety Significant Work Management Pressure to Get the Job Done

Pg.s 49 & 50

~~Alleged~~ stated that an Entergy Investigator (name in trans ~~alleged~~ on October 29 or 30, 1993, to make sure his concern dealt with.

The Entergy Investigator informed the ~~alleged~~ that he had the Field Engineer. The ~~alleged~~ asked the Entergy Investigator ask ...why did he tell me to sign something indicating work performed, when in fact, it had not, and then call it minor

The Entergy Investigator informed the ~~alleged~~ that the Field "answer was that he had been under a lot of pressure from to get those CWP's closed out".

**PSB RECOMMENDATION:**

PSB PERFORM AN INSPECTION AT ANO AS AN "AUGMENTATION OF THE INSPECTOR STAFF" (CHARGED AS ~~ALLEGATION~~ FOLLOWUP) TO ACCOMPLISH THE FOLLOWING:

1. Review the ANO employee concerns program. Review a random sample (approx. 5) of employee concern cases, for the September 1993 period, to determine adequacy of licensee action and determine if the specific ~~allegation~~ was an employee concern. Did the licensee evaluate the generic potential for incomplete safety related work being signed off as a result of management pressure for completion?
2. Review the ANO nonconforming condition reporting process. Obtain a random sample (approx. 5) of nonconforming conditions generated from September to December 1993. Determine if the licensee, and the Entergy Investigator generated a nonconforming condition report for the alleged signing off of work due to pressure to close CWP's. Determine the adequacy of the licensee's evaluation and possible corrective actions.
3. During performance of 1 and 2 above, attempt to obtain records that may be of assistance to OI. Specifically obtain the alleged signed off CWP checklist.

# ALLEGATION ASSIGNMENT FORM

Allegation Number: RIV-95-A-0009

Licensee/Facility or Location: Arkansas Nuclear One

Discussed at ARP meeting on: 11/30/95

7  
OI

Assigned to: DRP, DRS, DRSS, SAC Branch:

OI involvement? OI tracking number:

Allegation Summary: A copy of the [allegor's] DOL complaint was provided by DOL. The complaint alleges that the complainant's supervisor asked the complainant to sign off on work steps that had not been completed regarding fire penetration seal work. The complainant alleges termination and no subsequent rehiring during other contract opportunities for refusing to sign the documentation.

ARP instructions/guidance:

ARP Chairman: \_\_\_\_\_ Date: \_\_\_\_\_

Allegation Resolution Plan (return to the SAC within 10 days of ARP meeting):

OI to in terminate ~~accept~~ - DRS will assist in technical review - Phil Qualls.

Submitted by: \_\_\_\_\_

Date: \_\_\_\_\_

cc: Allegation File. ARP Meeting File. OI

II/14

Case per  
FUE

# ALLEGATION ASSIGNMENT FORM

Allegation Number: RIV-95-A-0009

Licensee/Facility or Location: Arkansas Nuclear One

Discussed at ARP meeting on: 1/30/95

Assigned to: DRP, DRS, DRSS, SAC Branch: \_\_\_\_\_

OI involvement?  OI tracking number: \_\_\_\_\_

**Allegation Summary:** *A copy of the ~~allegor's~~ DOL complaint was provided by DOL. The complaint alleges that the complainant's supervisor asked the complainant to sign off on work steps that had not been completed regarding fire penetration seal work. The complainant alleges termination and no subsequent rehiring during other contract opportunities for refusing to sign the documentation.*

ARP instructions/guidance: SAC to write acknowledgement letter to allegor; OI to interview and re-ARP. DRP to provide copies of work control documents to OI/DRS for background information.

\*

ARP Chairman: /s/ J. E. Dyer Date: 1/30/95

**Allegation Resolution Plan (return to the SAC within 10 days of ARP meeting):**

The CWP & DCP referenced in TP 9 of the DOL complaint  
consist of numerous job orders. The CWP & DCP are both  
~ 2 feet thick and cannot be easily copied. We  
have not been able to identify the job order that  
the allegor references in TP 13 as having been  
incorrectly signed.

Submitted by: Chris Van Deuren Date: 2/7/95  
cc: Allegation File. ARP Meeting File. OI

II/15

# ALLEGATION ASSIGNMENT FORM

*RIV*  
*inst...*  
*...*

Allegation Number: RIV-95-A-0009

Licensee/Facility or Location: ARKANSAS NUCLEAR ONE

Discussed at ARP meeting on: 3/6/95

Assigned to: DRP. DRS. DRSS. SAC Branch:

OI involvement? OI tracking number:

*Allegation Summary: Individual alleged termination for refusing to sign work completion documentation for fire penetration seal work when the work had not been performed or had not been performed by the alleged. DRS:PSB has reviewed the OI transcript of interview and requested that the allegation be discussed during a scheduled ARP.*

ARP instructions/guidance:

ARP Chairman: \_\_\_\_\_ Date: \_\_\_\_\_

*Allegation Resolution Plan (return to the SAC within 10 days of ARP meeting):*

*DRS-PSB will conduct inspection of fire seal issue. and if wrongdoing discovered staff will notify OI. OI to consider false reporter needs issue!*

Submitted by: \_\_\_\_\_ Date: \_\_\_\_\_  
cc: Allegation File. ARP Meeting File. OI

*II/16*

ATTACHMENT - ALLEGATION RIV-95-A-0009  
SUMMARY OF CONCERNS NOTED BY PSB DURING REVIEW OF TRANSCRIPT OF  
OI ALLEGER INTERVIEW

1. Controlled Work Package (CWP) Checklist step signed as completed when work had not been completed. Pages referenced below are transcript pages.

Pg.s 11.12.&13

"Electricians had run some new cables through conduits that penetrated the wall.." that emptied out into a junction box located approx. 8' off the floor, on the south wall of the ANO Unit 1 control room, during the 1993 fall outage. The ~~alleged~~ an asbestos worker, worked on the penetration seals for the conduit. At the end of the shift, the ~~alleged~~ (name in transcript) was "not through with this particular set of penetrations in this junction box and the cover was off. It required several screws to put it on and take it off, and I had some debris inside the box."

Pgs. 13 & 14

CWP Checklist required "Reinstall items removed for accessibility to penetration" and "Clean up all your debris and remove scaffolding."

Bechtel Field Engineer (name in transcript) told ~~alleged~~ to go ahead and sign for completion of the above noted steps even though not yet complete.

~~Alleged~~ stated that "he informed the Bechtel Field Engineer that "If he would give me maybe 15 or 20 minutes the next morning, that I would have time to finish that, and I could go ahead and sign the stuff."

Pg. 17

~~Alleged~~ stated that his Superintendent (name in transcript) signed the CWP Checklist step as having been completed.

Pg. 20

~~Alleged~~ stated that he looked at the junction box the next day and found that "the work was exactly as I had left it the afternoon before. Nothing additional had been done to it."

PSB RECOMMENDED ACTION :  
OI DETERMINE NEED TO INVESTIGATE FOR POTENTIAL FALSIFICATION OF CWP  
CHECKLIST RECORD

2. Potential Incomplete Safety Significant Work

As noted in 1 above, housekeeping in and around the junction box and closure of the junction box cover, was incomplete at the time the ~~alleged~~ left the are work area. This work was performed in September or October of 1993. No ~~allegation~~ was made regarding the adequacy of the penetration seals. The ~~alleged~~ incomplete work is not of major safety significance, but nonetheless, was an apparent incomplete safety related work activity.

PSB RECOMMENDED ACTION:

PSB VISUALLY INSPECT WORK AREA FOR SIGNS OFF INCOMPLETE WORK INCLUDING ADEQUACY OF INSTALLATION OF JUNCTION BOX COVER AND AREA HOUSEKEEPING. THIS MOST LIKELY SHOULD HAVE ALREADY BEEN CORRECTED.

3. Potential for Signing Off Incomplete Safety Significant Work Due to Management Pressure to Get the Job Done

Pg. s 49 & 50

~~Alleger~~ stated that an Entergy Investigator (name in transcript) met with ~~Alleger~~ on October 29 or 30, 1993, to make sure his concerns had been dealt with.

The Entergy Investigator informed the ~~Alleger~~ that he had also met with the Field Engineer. The ~~Alleger~~ asked the Entergy Investigator "Did you ask ...why did he tell me to sign something indicating work had been performed, when in fact, it had not, and then call it minor?"

The Entergy Investigator informed the ~~Alleger~~ that the Field Engineer's "answer was that he had been under a lot of pressure from his superiors to get those CWP's closed out".

PSB RECOMMENDATION:

PSB PERFORM AN INSPECTION AT ANO AS AN "AUGMENTATION OF THE RESIDENT INSPECTOR STAFF" (CHARGED AS ~~ALLEGATION~~ FOLLOWUP) TO ACCOMPLISH THE FOLLOWING:

1. Review the ANO employee concerns program. Review a random sample (approx. 5) of employee concern cases, for the September to December 1993 period, to determine adequacy of licensee action. Attempt to determine if the specific ~~allegation~~ was an employee concern case and determine the adequacy of the licensee's actions for the ~~alleged~~ concern. Did the licensee evaluate the generic potential for incomplete safety related work being signed off as complete because of management pressure for completion?
2. Review the ANO nonconforming condition reporting process. Review a random sample (approx. 5) of nonconforming condition reports generated from September to December 1993. Determine if the licensee, and the Entergy Investigator generated a nonconforming condition report for the ~~alleged~~ signing off of incomplete work due to pressure to close CWP's. Determine the adequacy of the licensee evaluation and possible corrective actions.
3. During performance of 1 and 2 above, attempt to obtain copies of records that may be of assistance to OI. Specifically, attempt to obtain the ~~alleged~~ signed off CWP checklist.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV

Walnut Creek Field Office  
1450 Maria Lane  
Walnut Creek, California 94596-5368

APR 18 1995

MEMORANDUM TO: Russ Wise, ~~Allegation~~ Coordinator, RIV  
FROM: W. P. Ang, Chief, Plant Support Branch, DRS, RIV *R.P./for WPA*  
SUBJECT: ~~ALLEGATION~~ RIV-95-A-0009

The subject ~~allegation~~ identified the following potential conditions at Arkansas Nuclear One (ANO).

1. A Controlled Work Package (CWP) checklist step was signed as completed when the work had not been completed.
2. A potential for incomplete safety significant work existed.
3. Other potentially incomplete safety significant work could have similarly been signed off as complete due to management pressure to get the job done.

An ~~Allegation~~ Review Panel reviewed the subject ~~allegation~~, reviewed Plant Support Branch (PBS) recommended actions, and assigned PSB to accomplish the following:

1. PSB perform an inspection at ANO as an "augmentation of the resident inspector staff" (charged as ~~allegation~~ followup) to accomplish the following:
  - a. Review the ANO employee concerns program. Review a random sample of employee concern cases, for the September to December 1993 period, to determine adequacy of licensee action. Attempt to determine if the specific ~~allegation~~ was an employee concern case and determine the adequacy of the licensee's actions for the alleged concern. Did the licensee evaluate the generic potential for incomplete safety related work being signed off as complete because of management pressure for completion?
  - b. Review the ANO nonconforming condition reporting process. Review a random sample of nonconforming condition reports generated from September to December 1993. Determine if the licensee, and the Energy Investigator generated a nonconforming condition report for the ~~alleged~~ signing off of incomplete work due to pressure to close CWPs. Determine the adequacy of the licensee evaluation and possible corrective actions.
  - c. During the performance of 1 and 2 above, attempt to obtain copies of records that may be of assistance to OI. Specifically, attempt to obtain the ~~alleged~~ signed off CWP checklist.

*22/17*

2. PSB visually inspect work area for signs of incomplete work including adequacy of installation of junction box cover and area housekeeping.

On March 20, 1995 to March 24, 1995, David Pereira, of PSB, performed an inspection at ANO to accomplish the inspections assigned by the ~~Allegation~~ Review Panel for the subject ~~allegation~~. The inspection and the results of the inspection were documented in a Plant Support Branch input to the ANO resident inspectors' report (50-513/95-03). The report input was purposely brief to preclude identification of the ~~allegation~~ in the report. The inspection did not confirm the ~~allegation~~. Details of the inspection are attached to this memorandum. This completes the action assigned to the PSB for this ~~allegation~~.

## ATTACHMENT

### DETAILS OF DAVID PEREIRA'S INSPECTION FOLLOWUP OF ~~ALLEGATION~~ RIV-95-A-0009

#### Review of Corrective Actions Program - Followup of ~~Allegation~~

A review of the licensee's corrective actions program was performed to ascertain that conditions adverse to quality were being appropriately identified, reviewed, and resolved. Specifically, a sample of procedures, nonconforming condition reports, and employee concerns program cases were reviewed. In addition, the inspector performed visual inspections of some of the noted conditions and interviewed licensee personnel to ascertain that appropriate corrective actions had been completed. The following documents were reviewed.

#### Procedures

Procedure 1000.104, "Condition Reporting and Corrective Actions,"  
Revision 11, dated January 1, 1995.

Procedure QAO-12, "Notification/Processing of Nuclear Safety/Quality  
Concerns," Revision 2, dated October 21, 1993.

#### Condition Reports

1-93-0518, November 2, 1993  
1-93-0488, October 21, 1993  
1-93-0457, October 12, 1993  
1-93-0463, October 13, 1993  
1-93-0414, October 5, 1993  
1-93-0419, October 5, 1993  
2-93-0226, September 22, 1993  
2-93-0230, September 27, 1993  
1-93-0482, October 19, 1993

#### Employee Concerns Cases

QI-93-04, September 15, 1993  
QI-93-05, October 19, 1993  
QI-93-06, September 24, 1993  
QI-93-07, October 26, 1993  
QI-94-01, February 28, 1994  
QI-94-03, April 15, 1994  
QI-95-01, January 25, 1995

#### Results of Inspection and ~~Allegation~~ Followup

Based on the inspector's review and verification of a sample of the above noted documents, the inspector concluded that conditions adverse to quality were being appropriately documented, reviewed, and resolved.

In addition, the above noted review, verification, and interviews of licensee personnel determined the following:

- The ~~allegor~~ had filed a U.S. Department of Labor (DOL) complaint on January 18, 1995. The DOL complaint included the same ~~allegation~~ regarding signoff of incomplete work on a fire barrier penetration junction box. The ~~allegor~~ stated in the DOL complaint that CWP 895633 and DCP 90-1051 were the working documents for the ~~alleged~~ incomplete work on the junction box. Based on the CWP number and the location of a junction box provided by the ~~allegor~~ in the subject ~~allegation~~ (located approximately 8 feet off the floor, on the south wall of the ANO Unit 1 control room, during the 1993 fall outage), the inspector determined that the junction box in question was located where penetration 129-0287 entered the control room. Documentation of penetration 129-0287 work was contained in CWP 90-1051/895633-6, sequence 18, and was completed on October 2, 1993.
- The inspector reviewed the documentation for the above noted CWP and was not able to substantiate the ~~allegor's~~ ~~allegation~~ of incorrect signoffs for work that was not complete. Penetration 129-0287 signoffs in CWP 90-1051/895633-6, sequence 18, appeared to be properly initialed and dated in the appropriate fields for all work performed, including reinstallation of the cover plate screws for the junction box, and cleaning the work area of debris and scaffolding. The initials and dates for all the work being performed on penetration 129-0287 appeared to be made by the ~~allegor~~. The ~~allegation~~ of signoff by the foreman of incomplete work, including adequacy of installation of junction box cover and area housekeeping, was not substantiated.

The inspector performed a visual inspection of the control room area where the junction box in question was located, and performed a visual inspection of the junction box cover. The inspector noted no discrepancies. The junction box cover was installed with all cover screws in place. The area housekeeping was in order and all scaffolding had been removed.

The inspector reviewed the ANO employee concerns program to determine adequacy of the licensee actions for employee concerns. The inspector reviewed seven employee concerns cases which were initiated from September 1993 through January 1995. The inspectors determined the following items concerning the employee concerns program:

- Each employee concern was investigated in a confidential and professional manner.
- Documentation of initial interview of concern was extensive and detailed.
- Formulation of an action plan was presented in the file.
- Investigation of concerns were extensive, and the scope was broad to include all possible events.
- Closure was presented to the concerned employee with the investigation results documented and conclusions presented to the employee.

In addition, the sequence of events and analysis were presented where appropriate. Documentation of discussions with affected individuals was included in the file. The employee concerns program procedure provided for initiating a condition report if the concern met the threshold for a condition report. Finally, closure interviews with the concerned employees were documented in their file.

One specific allegation was presented as employee concern cases QI-93-07, initiated October 26, 1993, and QI-95-01, initiated January 24, 1995. Both cases were reviewed by the inspector in detail and was the same as Allegation RIV-95-A-0009. These employee concern cases alleged that the employee's supervision wanted him to sign off certain steps that were not complete. The employee cited as examples scaffold removal and the remounting of a junction box cover in the control room as work that was not complete. The employee complained that he was being pressured to sign off steps which had not been completed by a field engineer.

The inspector reviewed both employee concern cases and determined that the licensee formulated an action plan, which included extensive reviews of the seal penetration work that the employee performed in the September through October 1993 period. Since the employee refused to indicate where the junction box was located in the control room, the licensee widened their search to incorporate all available work the employee performed in that timeframe. The licensee's review was conducted with quality control inspectors, field craft, and plant supervisors associated with seal penetration work.

The generic potential for incomplete safety-related work being signed off as complete due to pressure to close CWPs was not reviewed by the licensee because no similar concerns were presented. The licensee confined their investigation to the one field engineer in question.

In summary, the specific allegations were also submitted as employee concern cases. Nos. QI-93-07, and QI-95-01. In both cases, the specific allegation could not be substantiated, and as a result, the licensee expanded their investigation to include all work performed by the alleged in the fall 1993 timeframe in an effort to uncover any incomplete work. Their investigations did not discover any incomplete work or incorrect initials or dates in the Controlled Work Packages (CWPs) reviewed. The licensee investigated other work packages to ensure that they had covered all possibilities of the alleged's work. Even though the licensee did not evaluate the generic potential for incomplete safety-related work being signed off as complete because of management pressure for completion, no similar evidence was presented by other employees.

The inspector was repeatedly informed by the licensee modifications management and Entergy personnel involved with this allegation, that the alleged and the field engineer could not work together. As a matter-of-fact, the alleged was reassigned shortly after October 27, 1993, because of the inability to work with the field engineer and did not perform any further seal penetration work with the field engineer involved with the allegation.

The inspector's review indicated that the licensee performed an adequate investigation into the ~~allegor's~~ concerns. Their investigation could have been more precise in determining the specific junction box.

Additionally, the licensee's corrective action plan of October 26, 1993, left out the ~~allegor's~~ concern that his supervisor wanted him to sign off certain steps that he had not yet completed. The licensee's closure discussion did mention his complaint of being pressured to sign off steps which had not been completed and that the licensee's investigator proceeded to inform the ~~allegor~~ that this was not expected behavior from workers, nor supervision. The discussion does not bring closure as to whether it really happened or it was the ~~allegor's~~ mistake. At the conclusion of the closure discussion, both the Entergy investigator, and the ~~allegor~~ agreed that there were no nuclear safety issues concerning foam sealing of fire barrier penetrations. Further, at the termination interview on July 26, 1994, the ~~allegor~~ signed that he had no Nuclear Safety/Quality concerns regarding ANO.

In summary, the inspector determined that the licensee performed an adequate evaluation of this ~~allegation~~. The inspector could not substantiate any of the ~~allegor's~~ allegations.

The inspector reviewed the ANO nonconforming condition reporting process and nine ANO nonconforming condition reports (NCRs) generated from September to December 1993. None of the NCRs noted ~~alleged~~ signing off of incomplete work due to pressure to close CWP's.

The licensee's reasoning was that since there were no indications of incorrect signoffs in their October 1993 review process and no similar employee concerns regarding field engineers work at any time, there were no conditions which required an NCR to be generated. The ANO Condition Reporting Procedure, 1000.104, states that "if a documentation deficiency occurred, then an NCR would be generated." The licensee was not able to identify any documentation deficiencies. During the licensee's investigation, no concerns regarding pressure to sign off on CWP's were discovered.

A copy of CWP 90-1051/895633-6, sequence 18, is attached. Penetration 129-0287 appeared to be the area that the ~~allegor~~ indicated that the apparent junction box cover was not installed. The precise junction box was never indicated by the ~~allegor~~.



Entergy  
Operations

# ENTERGY OPERATIONS INCORPORATED

## ARKANSAS NUCLEAR ONE

21 OF 25

1. Penetration #: 129-0287      2. CWP #: 90-1051/895633-6      3. Unit: 1  
 4. Room #: 129      5. Elev.: 394'      6. Penetration Seal Detail: 61/A-2600  
 7. Fire Barrier #: 06      8. QC Review: Cathel Rogers  
 9. Sequence #: 18       New Seal       Repair Existing Seal

Work Steps	Description	Fore Date	Supt Date	FE Date	HP	QC Date	Comments/ Exceptions
A	Install scaffolding, ladders, protective covers, etc. Remove insulation, condulets, etc., as necessary.	gmd 9-28-93		418 9-30-93			
B	Remove existing material as required.	gmd 9-28-93		418 9-30-93			
C	Clean penetration substrate as required.	gmd 9-28-93		418 9-30-93			
D	Install 1" min. Cerafiber/Kaowool/Ceraboard per detail shown above.	gmd 9-28-93	TLS 9-28-93	418 9-30-93	HT	KFR 9-30-93	
E	Ensure pip/conduit/cable are free of damage.	gmd 10-1-93		418 10-1-93			
F	Notify qualified personnel for foam test.	gmd 10-1-93		418 10-1-93			See test results below.
G	Install silicone foam seal per detail above.	gmd 10-1-93		418 10-1-93			Installer: gmd
H	Trim excess foam as necessary, after 24-hour cure period.	gmd 10-2-93		418 10-2-93			
I	Verify seal is complete and free of visible defects.	gmd 10-2-93	TLS 10-2-93	418 10-2-93	HF	KFR 10/2/93	
J	Reinstall items removed for accessibility to penetration.	gmd 10-2-93		418 10-2-93			
K	Paint penetration numbers on both sides of fire barrier	N/A		N/A			
L	Clean work area of debris, tools, scaffolding, etc.	gmd 10-2-93		418 10-2-93			

**TEST RESULTS:**

\*Field Engineer or qualified personnel

Material: Dow Corning 3-6548 RTV Silicone Foam

Machine #: 006

Density: 22.1 #/CF

M&TE #: SC-029

Time: 10:10 A.M.

Date: 10-01-93

Lot #: Part A ET 033170

Part B ET 043926

inaccessible on NS

FORM TITLE

FORM NO.

REV.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV  
611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-8064

U.S. 170

MAY 25 1995 11:00

May 25, 1995

MEMORANDUM TO: E. L. Williamson, Director  
Office of Investigations, Region IV

FROM: Russell Wise, Senior ~~Allegations~~ Coordinator *RW 5/25*

SUBJECT: ARKANSAS NUCLEAR ONE - ~~ALLEGED~~ EMPLOYMENT  
DISCRIMINATION (OI 4-95-004)(RIV-95-A-0009)

This is in reply to your February 17, 1995, memorandum which requested, that the RIV staff review the OI transcript of interview of an individual who had expressed concerns of employment discrimination for refusing to falsify work documentation.

Bill Ang, Chief, Plant Support Branch, responded by E-mail on March 1, 1995. A copy of Mr. Ang's reply is attached. Additionally, a copy of Mr. Ang's summary of the inspection findings is also attached. The ~~allegations~~ were not substantiated.

Attachments:  
As stated

cc w/attachments:  
~~Allegation~~ File

27118

*DRS/RIV*  
From: William P. Ang (WPA)  
To: *Pat Gwynn* TPG, RXW *Russell Wise* *EACS/RIV*  
Date: *DRS/RIV* Wednesday, March 1, 1995 7:26 pm  
Subject: RIV-95-A-009

PLS. SEE ATTACHED. SIGNED COPY TO FOLLOW BY MAIL.

CC: RJK, ELWI, PMQ, CAV

Files: P:\RIV-A-95.ANO

MEMORANDUM FOR : R. WISE, ~~Allegation~~ Coordinator  
THRU : T. P. GWYNN, Division Director, DRS  
FROM : W. P. ANG, Plant Support Branch Chief, DRS  
SUBJECT : ALLEGATION RIV-95-A-0009

On February 28, 1995, L. Williamson, OI, provided the Plant Support Branch a copy of the transcript of the OI interview of the ~~alleged~~ for the subject ~~allegation~~. The interview was conducted by OI on February 8, 1995. The Plant Support Branch (P. Qualls and W. Ang) reviewed the OI interview transcript to identify any safety concerns expressed by the ~~alleged~~. Attached is a summary of information provided by the ~~alleged~~ during the interview, the potential ~~alleged~~ concerns noted during the review of the transcript by the Plant Support Branch, and recommended action for those concerns.

W. P. ANG

ATTACHMENT - ~~ALLEGATION RIV-95-A-0009~~  
SUMMARY OF CONCERNS NOTED BY PSB DURING REVIEW OF TRANSCRIPT OF  
OI ALLEGER INTERVIEW

1. Controlled Work Package (CWP) Checklist step signed as completed when work had not been completed. Pages referenced below are transcript pages.

Pg.s 11,12.&13

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Pgs. 13 & 14

CWP Checklist required "Reinstall items removed for accessibility to penetration" and "Clean up all your debris and remove scaffolding."

Bechtel Field Engineer (name in transcript) told ~~alleged~~ to go ahead and sign for completion of the above noted steps even though not yet complete.

~~Alleged~~ stated that "he informed the Bechtel Field Engineer that "If he would give me maybe 15 or 20 minutes the next morning, that I would have time to finish that, and I could go ahead and sign the stuff."

Pg. 17

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Pg. 20

~~Alleged~~ stated that he looked at the junction box the next day and found that "the work was exactly as I had left it the afternoon before. Nothing additional had been done to it."

PSB RECOMMENDED ACTION :  
OI DETERMINE NEED TO INVESTIGATE FOR POTENTIAL FALSIFICATION OF CWP  
CHECKLIST RECORD

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PSB VISUALLY INSPECT WORK AREA FOR SIGNS OFF INCOMPLETE WORK INCLUDING ADEQUACY OF INSTALLATION OF JUNCTION BOX COVER AND AREA HOUSEKEEPING. THIS MOST LIKELY SHOULD HAVE ALREADY BEEN CORRECTED.

3. Potential for Signing Off Incomplete Safety Significant Work Due to Management Pressure to Get the Job Done

Pg. s 49 & 50

~~Alleged~~ stated that an Entergy Investigator (name in transcript) met with ~~Alleged~~ on October 29 or 30, 1993. to make sure his concerns had been dealt with.

The Entergy Investigator informed the ~~alleged~~ that he had also met with the Field Engineer. The ~~alleged~~ asked the Entergy Investigator "Did you ask ...why did he tell me to sign something indicating work had been performed, when in fact, it had not, and then call it minor?"

The Entergy Investigator informed the ~~alleged~~ that the Field Engineer's "answer was that he had been under a lot of pressure from his superiors to get those CWP's closed out".

PSB RECOMMENDATION:

PSB PERFORM AN INSPECTION AT ANO AS AN "AUGMENTATION OF THE RESIDENT INSPECTOR STAFF" (CHARGED AS ~~ALLEGATION~~ FOLLOWUP) TO ACCOMPLISH THE FOLLOWING:

1. Review the ANO employee concerns program. Review a random sample (approx. 5) of employee concern cases, for the September to December 1993 period, to determine adequacy of licensee action. Attempt to determine if the specific ~~allegation~~ was an employee concern case and determine the adequacy of the licensee's actions for the ~~alleged~~ concern. Did the licensee evaluate the generic potential for incomplete safety related work being signed off as complete because of management pressure for completion?
2. Review the ANO nonconforming condition reporting process. Review a random sample (approx. 5) of nonconforming condition reports generated from September to December 1993. Determine if the licensee, and the Entergy Investigator generated a nonconforming condition report for the ~~alleged~~ signing off of incomplete work due to pressure to close CWP's. Determine the adequacy of the licensee evaluation and possible corrective actions.
3. During performance of 1 and 2 above, attempt to obtain copies of records that may be of assistance to OI. Specifically, attempt to obtain the ~~alleged~~ signed off CWP checklist.

# ALLEGATION ASSIGNMENT FORM

Allegation Number: RIV-95-A-0009

Licensee/Facility or Location: ARKANSAS NUCLEAR ONE

Discussed at ARP meeting on: 2/20/96

Assigned to: DRP, DRS, DNMS, SAC Branch:

OI involvement? YES OI tracking number: 4-95-004 RK

**Allegation Summary:** *An individual alleged he was terminated for refusing to sign work completion documentation for fire penetration seal work when the work had not been performed by him. The allegor stated that his supervisor obtained and signed the work documentation. The technical issues were resolved, but OI continued the investigation. OI has completed the additional review necessary relative to the supervisor's alleged activities, and substantiated the allegor's concerns. However, the activity in question was not safety-related. OGC has provided an opinion relative to NRC's responsibility for informing the licensee.*

ARP instructions/guidance:

ARP Chairman: \_\_\_\_\_ Date: \_\_\_\_\_

Allegation Resolution Plan (return to the SAC within 10 days of ARP meeting):

*OI to close, ECC pending issue is maintained and to CE for review.*

Submitted by: \_\_\_\_\_ Date: \_\_\_\_\_  
cc: Allegation File, ARP Meeting File, OI

III/19

# ALLEGATION ASSIGNMENT FORM

\* Allegation Number: **RIV-95-A-0009**

Licensee/Facility or Location: **ARKANSAS NUCLEAR ONE**

Discussed at ARB meeting on: **6/10/96**

Assigned to: **DRP, DRS, DNMS, SAC** Branch: **EB**

OI involvement? **YES** OI tracking number: **4-95-004 RK**

*Allegation Summary: An individual alleged he was terminated for refusing to sign work completion documentation for fire penetration seal work when the work had not been performed by him. The ~~allegor~~ stated that his supervisor obtained and signed the work documentation. The technical issues were resolved, but OI continued the investigation. OI has completed the additional review necessary relative to the supervisor's alleged activities, and substantiated the ~~allegor's~~ concerns. However, the activity in question was not safety-related. OGC has provided an opinion relative to NRC's responsibility for informing the licensee. 2/20/96 ARB instructed SAC to REARB when OI's report and OE's memo was received. This allegation was discussed at recent OE conference call and determined the issue should be REARB'd for reassignment.*

ARB instructions/guidance: **DRS:EB to send a write-up highlighting its findings; REARB findings.**

ARB Chairman: J. E. Dyer *Duhya* Date: 6/17/96

\* Allegation Resolution Plan (return to the SAC within 10 days of ARB meeting):  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Submitted by: \_\_\_\_\_ Date: \_\_\_\_\_  
cc: Allegation File, ARB Meeting File, OI

*III/20*

From: Elmo Collins *DM:IS/RIV*  
To: GFS *D. Santora EAG/RIV*  
Date: 9/11/96 9:10am  
Subject: ANO - OI 4-95-004

ANO, Mike Cooper, asked for a copy of the OI report. In our letter to them, we asked them to re-evaluate some items.

What are we allowed to send them, and what is the process which must be followed.

Thanks

CC: KEB, ELW1, DDC

*II/c1*



# PECO NUCLEAR

A UNIT OF PECO ENERGY

*not raised  
need lot  
response*

Walter G. MacFarland, IV, P.E.  
Vice President  
Limerick Generating Station

PECO Energy Company  
PO Box 2300  
Sanatoga, PA 19464-0920  
610 718 3000  
Fax 610 718 3008  
Pager 1 800 672 2285 #8320

January 22, 1997

Docket Nos. 50-352  
50-353  
License Nos. NPF-39  
NPF-85

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

**SUBJECT: Limerick Generating Station - Units 1 and 2  
Reply to a Verbal Request for Information  
Regarding Fire Protection System Inspection  
Records**

On January 16, 1997, Special Agent Kristin L. Monroe of the NRC Office of Investigation verbally requested certain PECO Energy Company documents pertaining to an investigation of Fire Protection System inspection records. Some of these records contain confidential information, the disclosure of which would constitute an unwarranted invasion of the personal privacy of the individuals involved. These confidential records are included as Attachment 2 to this letter and are being submitted to the Commission with a request that they be withheld from public disclosure in accordance with Section 2.790(a)(6) of the Commission's Regulations. The other requested documents do not contain confidential information.

Attachment 1 to this letter is an affidavit setting forth the reasons in support of this request to withhold from public disclosure.

If you have any additional questions or require additional information, please contact us.

Very truly yours,

DBN:cah  
Attachments

cc: H. J. Miller, Administrator Region I, USNRC w/o Attachment 2  
N. S. Perry, USNRC Senior Resident Inspector, LGS w/o Attachment 2  
K. L. Monroe, Special Agent, USNRC w/ Attachments

*III/22*

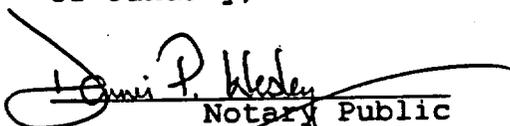
COMMONWEALTH OF PENNSYLVANIA :  
 :  
 : ss.  
 :  
COUNTY OF MONTGOMERY :

Walter G. MacFarland, IV, being first duly sworn, deposes and states as follows:

1. I am Vice President, Limerick Generating Station of PECO Energy Company and I am duly authorized to execute this affidavit.
2. PECO Energy Company has requested, in accordance with Section 2.790 of the Commission's Regulations, that certain information being submitted to the Commission be withheld from public disclosure. I am familiar with the contents of the information.
3. The information which is sought to be withheld from public disclosure contains details of the disciplinary action taken against certain individuals as a result of PECO Energy Company's investigation of Fire Protection Record discrepancies at Limerick Generating Station.
4. This information contains information similar to personnel and medical files, the disclosure of which would constitute a clearly unwarranted invasion of the personal privacy of the individuals involved.
5. The information contained in this transmittal is of the type customarily held in confidence by PECO Energy Company and is not customarily disclosed to the public. The information has not been disclosed to the public and is not available from public sources.
6. The information should be withheld from public disclosure by the NRC because such disclosure is not required in the public interest and such disclosure would constitute an unwarranted invasion of the personal privacy of the individuals involved.

  
 \_\_\_\_\_  
 Walter G. MacFarland, IV  
 Vice President - LGS

Subscribed and sworn to before me this 22<sup>nd</sup> day of January, 1997.

  
 \_\_\_\_\_  
 Notary Public

Notarial Seal  
 Dennis P. Wesley, Notary Public  
 Limerick Twp., Montgomery County  
 My Commission Expires April 7, 1997  
 Member, Pennsylvania Association of Notaries



**PECO NUCLEAR**

A UNIT OF PECO ENERGY

Walter G. MacFarland, IV, P.E.  
Vice President  
Limerick Generating Station

PECO Energy Company  
PO Box 2300  
Sanatoga, PA 19464-0920  
610 718 3000  
Fax 610 718 3008  
Pager 1 800 672 2285 #8320

February 7, 1997

Docket Nos. 50-352  
50-353  
License Nos. NPF-39  
NPF-85

Kristin L. Monroe, Special Agent  
U.S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406

**SUBJECT: Limerick Generating Station - Units 1 and 2  
Reply to a Verbal Request for Information  
Regarding Disciplinary Action Taken Against a  
Chemistry Technician**

Dear Ms. Monroe:

On February 7, 1997, you verbally requested certain PECO Energy Company documents pertaining to disciplinary action taken against a Chemistry Technician associated with a sample taken for an inoperable radiation monitor. This record contains confidential information, the disclosure of which would constitute an unwarranted invasion of the personal privacy of the individual involved. This confidential record is included as Attachment 2 to this letter and is being submitted to the Commission with a request that this be withheld from public disclosure in accordance with Section 2.790(a)(6) of the Commission's Regulations.

Attachment 1 to this letter is an affidavit setting forth the reasons in support of this request to withhold from public disclosure.

If you have any additional questions or require additional information, please contact us.

Very truly yours,

Walter G. MacFarland, IV, P.E.

DBN:cah  
Attachments

II/23

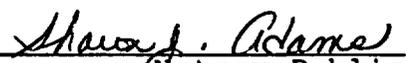
COMMONWEALTH OF PENNSYLVANIA :  
: ss.  
COUNTY OF MONTGOMERY :

Walter G. MacFarland, IV, being first duly sworn, deposes and states as follows:

1. I am Vice President, Limerick Generating Station of PECO Energy Company and I am duly authorized to execute this affidavit.
2. PECO Energy Company has requested, in accordance with Section 2.790 of the Commission's Regulations, that certain information being submitted to the Commission be withheld from public disclosure. I am familiar with the contents of the information.
3. The information which is sought to be withheld from public disclosure contains details of the disciplinary action taken against a Chemistry Technician as a result of PECO Energy Company's investigation of a sample taken for an inoperable radiation monitor at Limerick Generating Station.
4. This information contains information similar to personnel and medical files, the disclosure of which would constitute a clearly unwarranted invasion of the personal privacy of the individuals involved.
5. The information contained in this transmittal is of the type customarily held in confidence by PECO Energy Company and is not customarily disclosed to the public. The information has not been disclosed to the public and is not available from public sources.
6. The information should be withheld from public disclosure by the NRC because such disclosure is not required in the public interest and such disclosure would constitute an unwarranted invasion of the personal privacy of the individuals involved.

  
Walter G. MacFarland, IV  
 Vice President - LGS

Subscribed and sworn to before me this 7<sup>th</sup> day of February, 1997.

  
Howard J. Adams  
 Notary Public  
 Commission expires 8/3/98



**PECO ENERGY**

J. C. Rullo  
Manager - Security  
Claims - Security Division  
Legal Department

PECO Energy Company  
2301 Market Street  
PO Box 8699  
Philadelphia, PA 19101-8699  
215 841 4295

Direct Dial: 215 841 4290

August 15, 1996

Ms. Kristin Monroe, Special Agent  
Office of Investigations, Region One Field Office  
U. S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406

RE: Case No. 40-80-96-3522

Dear Ms. Monroe:

In response to a request by the U. S. Nuclear Regulatory Commission, Office of Investigations, in the referenced matter, PECO Energy Company is providing certain statements obtained from its employees by its Security Division during the course of an investigation initiated August 13, 1996 concerning an allegation of record falsification at its Limerick Generating Station Units 1 and 2. The statements concerning this matter were given with the expectation that such statements would be treated as confidential information and not disclosed. Consequently, we believe that the statements are the type of information the disclosure of which would constitute an unwarranted invasion of the personal privacy of the individuals involved. Based upon the foregoing and for the additional reasons stated in the attached Affidavit, it is hereby requested in accordance with Section § 2.790 of the Commission's regulations that the enclosed statements be withheld from public disclosure.

If we can provide any additional information on this matter, please feel free to contact us.

Very truly yours,

Joseph C. Rullo  
Manager-Security

lc

Enclosures

*Handwritten initials: JI/24*

Commonwealth of Pennsylvania :  
: SS  
County of Philadelphia :

**Joseph C. Rullo, being first duly sworn deposes and states:**

**1. I am Manager of the Security Division of PECO Energy Company, Licensee under U. S. Nuclear Regulatory Commission licenses NPF-39 and NPF-85 for Limerick Generating Station Units 1 and 2.**

**2. In my position, I was responsible for the direction of an investigation into an allegation of falsification of records by PECO Energy Company's employees assigned to the Company's Limerick Generating Station.**

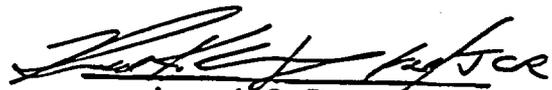
**3. I am familiar with the investigative statements of employees relative to this matter. The statements which have been requested by the U. S. Nuclear Regulatory Commission include detailed information concerning the allegation and the individuals involved in the allegation.**

**4. The statements were provided by these individuals with an expectation that such statements would be treated as confidential information and would not be disclosed. PECO Energy Company has treated the statements as confidential information and has not publicly disclosed them. PECO Energy Company has limited distribution of the information in the statements to those individuals with a need to know such information to fulfill their legal and management responsibilities.**

**5. Disclosure of the statements relating to the allegation by the individuals involved in the investigation could constitute an unwarranted invasion of the personal privacy of the individuals involved in the investigation as well as those individuals not involved directly in the investigation, but who provided information or were identified in the course of the investigation.**

**6. Disclosure of the statements would disclose the investigative techniques used in the investigation which could jeopardize the success of future investigations of this type. Further, disclosure of the identity of the individuals who provided information during the course of the investigation would adversely affect these individuals and would further jeopardize the future availability of information from individuals in other investigations.**

7. Based upon the foregoing, PECO Energy Company has concluded that disclosure of the information contained in the investigative files would constitute an unwarranted invasion of the person privacy of the individuals involved, would adversely affect the course of future investigations, would adversely affect the interests of the individuals involved and the Interests of PECO Energy Company, and that such disclosure is not required in the public interest.

  
Joseph C. Rullo

Sworn to and Subscribed  
before me this 15th day  
of August, 1996

\_\_\_\_\_  
Notary Public

# EXHIBIT 3

Information in this record was deleted  
in accordance with the Freedom of Information  
Act, exemptions b7c  
FOIA- 99-76

5311

EXHIBIT

RIVER BEND STATION SECURITY STATEMENT  
SEC FM 172

JULY 1992

DATE: 01-06-97

RETAIN WITH FILE FOR REQUIRED DURATION.

LAST NAME, FIRST, MI. A. LLARO, JOSEPH I	KCN (REDACTED)	COMPANY TWC	DEPARTMENT Security 7C
NAME OF SUPERVISOR Brady Richmond	EXTENSION 4408	SECURITY INCIDENT REPORT NUMBER N/A	

STATEMENT

I, JOSEPH I. DILLARD want to make the following voluntary statement:

At approximately 0815 hours I was told by (REDACTED) that it appeared the 0700-0800 RCA firewatch tour was not completed properly. Investigation showed that CHRIS STUDEVANT was assigned this tour and that he entered the Aux Bldg at 0704 hours and exited at 0711 hours. This was the only area that he checked. The Fuel Building, B tunnel west RCA side and A tunnel were not checked. I questioned CHRIS about his failure to properly complete his tour and he stated that he felt sick and did not complete the tour. I told him he should have told me he was sick and we could have worked something out. He stated that he did not know how to get in touch with me. He then stated that he did not have a reason for not completing his tour. LAST

Postured  
7C

EXHIBIT 3  
PAGE 1 OF 1 PAGE(S)

CONTINUED ON REVERSE

CASE NO. 4-97-003

# EXHIBIT 4

information in this document was disclosed  
in accordance with the Freedom of Information  
Act, exemptions 7C  
FOIA- 99-74

5/7/2

EXHIBIT

RIVER BEND STATION SECURITY STATEMENT  
SECFM 172

JULY 1992

DATE: 1-7-97

RETAIN WITH FILE FOR REQUIRED DURATION.

LAST NAME, FIRST, MI.

KCN

COMPANY

DEPARTMENT

Sturdivant, Christopher, T.

[REDACTED]

Wackerhut

SECURITY / FIRE OFFICER 7C

NAME OF SUPERVISOR

EXTENSION

SECURITY INCIDENT REPORT NUMBER

Sam Robertson

277C

STATEMENT

I, Christopher J. Sturdivant want to make the following voluntary statement:

On Jan. 7, 1997, at approx. 7:04 am, I was supposed to make a firewatch tour of the R.C.A. I made a tour of the Auxiliary Building but did not make a tour of the Fuel Building. I didn't tour the Fuel Building because I have a cold and do not feel well. I did not feel well enough to complete the second tour of the R.C.A. and did not think to contact a fire-watch trained/certified security officer and ask him/her to do the second for me. In thinking only about myself and how bad I felt, I neglected my duties as a firewatch and could have endangered other lives if a fire had broken out. I am truly sorry for this act and if given a second chance, promise to perform all of the firewatch tours and if I am unable to perform the tour due to illness or being tired, will call a fire watch certified security officer to do the tour for me.

~~LAST~~

EXHIBIT 4

PAGE 1 OF 1 PAGE(S)

CONTINUED ON REVERSE

CASE NO. 4 - 97 - 003

PAGE \_\_\_\_\_ OF \_\_\_\_\_

# EXHIBIT 5

Information in this record was deleted  
in accordance with the Freedom of Information  
Act, exemptions b7C  
FOIA- b7D

57/3

EXHIBIT



Entergy

Entergy Operations, Inc.  
River Bend Station  
5490 U.S. Highway 17  
P.O. Box 207  
Columbia, Louisiana 70526  
Tel: (504) 336-6225  
Fax: (504) 336-6225

Rick J. King  
Director  
Nuclear Safety & Regulatory Affairs

February 26, 1997

Mr. Russell Wise  
U. S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 400  
Arlington, TX 76011-8064

Subject: River Bend Station - Unit I  
Docket No. 50-458  
Licensing No. NPF-47  
River Bend Station Response to Allegation No. RIV-97-A-0007

File No.: G9.5

RBG-43752  
RBF1-97-0070

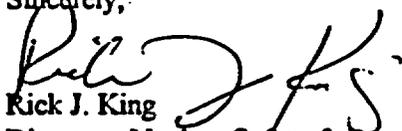
Dear Mr. Wise:

On February 5, 1997, Entergy Operations, Inc. (EOI) personnel discussed the details of our investigation performed on this allegation with Mr. Russell Wise of the Nuclear Regulatory Commission (NRC) Region IV staff. The allegation was transmitted to River Bend Station by letter dated January 30, 1997. However, River Bend Station management was aware of this issue upon discovery of the condition on January 6, 1997 and took immediate corrective actions.

The results of our investigation and corrective actions completed are summarized in Attachment 1. The site resident inspector has also been briefed on the investigation results.

The investigation report is on file for future NRC inspection. In accordance with 10 CFR 2.790, this document contains information of a personal and confidential nature and should be withheld from public disclosure. If you have any questions regarding this issue or if we can be of further assistance, please contact me at (504) 336-6225.

Sincerely,

  
Rick J. King  
Director - Nuclear Safety & Regulatory Affairs

RJK/DHW/dw  
enclosure

EXHIBIT 5  
PAGE 1 OF 3 PAGE(S)

CASE NO. 4 - 97 - 003

River Bend Station Response to Allegation No. RIV-97-A-0007  
February 26, 1997  
RBF1-97-0070  
RBG-43752  
Page 2 of 2

cc: NRC Senior Resident Inspector  
PO Box 1050  
St. Francisville, LA 70775

EXHIBIT 5  
PAGE 2 OF 3 PAGE(S)

CASE NO. 4 - 97 - 003

Attachment 1

Allegation RIV-A-97-0007

On January 6, 1997 a [REDACTED] to the Security Shift Supervisor that it appeared a fire watch roving patrol tour inside the radiologically controlled area (RCA) was not properly performed. The [REDACTED] The fire watch individual was immediately relieved of roving patrol duties, and a different individual was assigned to complete the roving patrol tour inside the RCA. [REDACTED] 76

Security management, using key card history printouts from the Security Computer System, determined that the tour in question was improperly completed and that the possibility existed that other tours by this individual may also have been improperly completed. Further investigation identified that between 11/01/96 and 01/06/97, this individual documented the completion of 305 roving fire watch patrol tours; 105 of which were determined to be improperly performed. All other fire watch patrols between 11/01/96 and 01/06/97 were properly completed and documented. Also, between 11/01/96 and 01/06/97, Security Supervisors performed direct oversight of 198 roving fire tours, thirteen of which were specifically with this individual. Supervision was available to provide shift relief had the individual requested a relief.

During the time frame this individual was employed to perform roving fire watch tours, 11/01/96 through 01/08/97, there were no other improperly performed fire watch tours identified. Furthermore, the general areas of fire watch roving tours (RCA and non-RCA) are rotated every two hours with a different individual completing the tours.

Fire watch functions are contracted with The Wackenhut Corporation under the supervision of the Superintendent Plant Security. Fire watch personnel are given a copy of expectations to read and sign during training. A copy of these expectations is also posted on a bulletin board in the fire watch break area.

An independent detailed investigation by Corporate Security personnel concluded that there were no other instances of tours being improperly performed by other fire watch personnel. Therefore, this condition is considered to be an isolated case involving a single individual.

[REDACTED]

The Superintendent Plant Security instructed The Wackenhut Corporation to meet with fire watch personnel to reiterate the importance of their function and what to do if they need relief or feel they cannot complete the assigned roving patrols.

Corrective actions have been completed.

EXHIBIT 5  
PAGE 3 OF 3 PAGE(S)

# Report Of Investigation Concerning Missed Firewatch Rounds

## Overview and Purpose

On January 7, 1997 a request by Howard Hutchens, Security Superintendent River Bend Station was made to investigate the firewatch rounds missed by Christopher Sturdivant (587-61-5640). The request was to look at the records and to interview personnel, as needed, to ascertain if this was an isolated incident or if there was more incidents of missed firewatch rounds.

## Details of Investigation

Key Card histories were run of all firewatch personnel to determine if any other personnel assigned firewatch duties were not completing the rounds as they had been assigned. From this review of records it was determined that the rounds were being completed by the firewatch. No other discrepancy could be found other than those by Sturdivant. A review of the key card histories of Sturdivant showed that he did not make the rounds assigned to him.

Key Card Histories were run of firewatch supervision and reflected that there had been constant and detailed supervision by assigned supervisors overseeing day-to-day shift supervision.

Christopher Sturdivant was interviewed on January 8, 1997. Mr. Sturdivant was questioned about the round he had been assigned and he admitted that he had not made his assigned rounds as the histories had shown. He gave that it was because he was "lazy" and had been "tired from hunting" and "just did not want to make them" as excuses for his poor work performance. When asked about others he stated that he had no knowledge of any other firewatch doing as he had and not completing their rounds. Mr. Sturdivant stated that he was sorry for what he had done and that he alone was responsible for this incident.

## Conclusion

The histories run showed no other instance of rounds being missed by any other firewatch. Supervision was there giving Mr. Sturdivant the opportunity to request relief had he a need for it or asked for it. This was an isolated case and no other firewatch was interviewed. Howard Hutchens has instructed TWC to meet with firewatch personnel to reiterate the importance of their jobs and what to do if they need relief or feel they can not complete the assigned rounds.

Information in this record was deleted  
in accordance with the Freedom of Information  
Act, exemptions 7c  
FOIA- 89-76

01/09/97

Investigation - Missed Fire Watch Rounds

On January 6, 1997 at approximately 0815 hours, a [REDACTED] informed the Security Shift Supervisor (who also supervises fire watch) that he believed a complete tour of the RCA had not been done by a fire watch employee. A computer key card history was run on the fire watch employee. It was discovered that the RCA fire watch had only entered the Auxiliary Building and had not entered the Fuel Building. The fire watch route log\* was checked and all areas in the RCA were initialed indicating that the checks were completed. The Security Shift Supervisor questioned the fire watch employee about his failure to complete the required patrol. The fire watch employee responded that he had felt sick. [REDACTED]

Investigation of this event prompted a computer card history for all fire watch employees for the past two months. Review of all histories, indicate that the fire watch in question, had not been completing all rounds since November 21, 1996. The key card histories also reveal that this event appears to be isolated to only this fire watch employee. During the period checked, the histories show that there were 198 supervisor checks of fire watch tours. Key card histories on the other fire watch personnel showed no discrepancies.

Security took possession of the fire watch program on November 1, 1996. Fire watch employees are informed at each shift briefing to contact their supervisor if they cannot complete the required patrol within one hour. There are also placards over the fire watch desk stating this.

[REDACTED]

McKinley Moore 0991

\* COPIES HAVE BEEN REQUESTED BY RESIDENT INSPECTORS.

7/13/97

January 18, 1995

**MEMORANDUM TO:** John B. Martin, Regional Administrator  
Region III

**FROM:** Eugene T. Pawlik, Director  
Office of Investigations Field Office, Region III

**SUBJECT:** DONALD C. COOK NUCLEAR POWER PLANT: ALLEGED DELIBERATE  
FALSIFICATION OF FIRE WATCH RECORDS (CASE NO. 3-94-059)

Enclosed, for whatever action you deem appropriate, is the Office of Investigations (OI) Report of Investigation concerning the above matter. Neither this memorandum nor the report may be released outside the NRC without the permission of the Director, OI. Internal NRC access and dissemination should be on a need-to-know basis. Treat as "Official Use Only."

Enclosure:  
Report w/exhibits

cc w/encl:  
R. DeFayette, RIII

**Distribution:**

c/f  
s/f (3-94-059)  
J. Weddle, OI:HQ  
L. Gallop, OI:HQ w/o exhibits  
B. Barber, Title Page and Synopsis

Information in this record was deleted  
in accordance with the Freedom of Information  
Act, exemptions 7C  
FOIA- 99-76

*Handwritten initials: JTB*

To receive a copy of this document, indicate in the box "C" = Copy without attach/encl "E" = Copy with attach/encl "N" = No copy

OFFICE	OI:RIII <i>JTB</i>	OI:RIII			
NAME	RDeVitto:jh	EPawlik <i>EP</i>			
DATE	01/18/95	01/18/95			

OFFICIAL RECORD COPY

CASE No. 3-94-059



**United States  
Nuclear Regulatory Commission**

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# **Report of Investigation**

**DONALD C. COOK NUCLEAR POWER PLANT:**

**Alleged Deliberate Falsification of Fire Watch Records**

**Office of Investigations**

Reported by OI: **RIII**

**Title: DONALD C. COOK NUCLEAR POWER PLANT:**

**Alleged Deliberate Falsification of Fire Watch Records**

**Licensee:**

**Indiana Michigan Power Company  
One Riverside Plaza  
Columbus, OH 43216**

**Docket No.: 50-315; 50-316**

**Case Number: 3-94-059**

**Report Date: January 18, 1995**

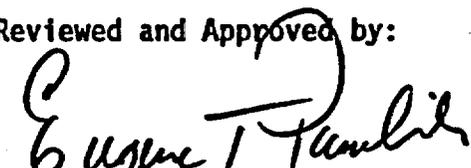
**Control Office: OI:RIII**

**Status: CLOSED**

**Reported by:**

  
Richard L. DeVitto, Investigator  
Office of Investigations  
Field Office, Region III

**Reviewed and Approved by:**

  
Eugene V. Pawlik, Director  
Office of Investigations  
Field Office, Region III

**WARNING**

**The attached document/report has not been reviewed pursuant to Title 10 CFR Subsection 2.790(a) exemptions nor has any exempt material been deleted. Do not disseminate or discuss its contents outside NRC. Treat as "OFFICIAL USE ONLY."**

## SYNOPSIS

This investigation was initiated by the Office of Investigations (OI), Region III (RIII), on September 21, 1994, to determine if a contract fire watch employee assigned to the Donald C. Cook Nuclear Power Plant, Stevensville, Michigan, deliberately falsified fire watch tour records.

After a preliminary review of this matter and coordination with the RIII technical staff and Regional Counsel, it was determined that this matter is of normal priority. Due to OI:RIII pursuing investigations with higher priorities, this matter is being closed.

11/11/84

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## DETAILS OF INVESTIGATIONS

### Applicable Regulations

#### Allegation: Alleged Deliberate Falsification of Fire Watch Records

10 CFR 50.9: Complete and accurate information.  
18 U.S.C. 1001, Statement Generally.  
Donald C. Cook Nuclear Plant Technical Specifications 3.7.10.

### Purpose of Investigation

This investigation was initiated by the Office of Investigations (OI), Region III (RIII), on September 21, 1994, to determine if a contract fire watch employee assigned to the Donald C. Cook Nuclear Power Plant (Cook), Stevensville, Michigan, deliberately falsified fire watch tour records.

### Background

During the course of an inspection at Cook during the week of May 9, 1994, the licensee self-identified a potential falsification of fire watch tours by a former employee identified as [REDACTED]. The condition was identified by the licensee during a review of fire watch tours performed by [REDACTED] from November 17, 1993, through December 31, 1993. During the conduct of the licensee's audit, at least 22 tours could not be verified via card reader transactions or other sources. At least four of these tours exceeded the technical specifications for one hour fire watch patrols. The remaining tours were only violations of administrative procedures and did not violate technical specifications.

### Interview of Allegor

The employee was interviewed on May 24, 1994, by Mr. Larry SMEAD, the security operations supervisor for Cook, and denied falsifying any records. [REDACTED] maintained that [REDACTED] checked the areas as reported. [REDACTED] was not re-hired by the new fire watch contractor [REDACTED].

### Coordination with the NRC Staff

On August 22, 1994, an NRC:RIII Allegation Review Board was convened to discuss this matter. The Board concluded that the matter be closed out as normal priority because [REDACTED] is no longer on the site access list.

### Closure Information

Based on a determination that this investigation is of normal priority, higher priority cases take precedence and this case is being closed. If at a future date information is developed which raises the priority of this case, OI:RIII will re-evaluate the matter.

*Porter*  
7C

Supplemental Information

SHEAD was interviewed by OI on December 16, 1994, and confirmed that he interviewed [REDACTED] and that [REDACTED] denied falsifying plant fire watch tour check sheets. SHEAD said that since not all watch areas in question were access controlled, [REDACTED] was not disciplined or let go for cause. However, [REDACTED] was let go when the new fire watch contractor failed to retain her, based solely on [REDACTED] 7E

## LIST OF EXHIBITS

<u>Exhibit No.</u>	<u>Description</u>
1	Investigation Status Report, dated September 21, 1994.
2	Cook Administrative Department Corrective Action Document - Tracking Form (Fire Watch Investigation).
3	Report of Interview with SMEAD, dated December 16, 1994.

LETTER TO: [unclear]

**Allegation Receipt Report**  
(Use also for STAFF SUSPECTED WRONGDOING)

Date/Time Received: \* 2/2/95 4:00 P.M. Allegation No. KL-95-A-0029  
(leave blank)

Employee Receiving Allegation or suspecting wrongdoing (first two initials and last name): WILLIAM A COOK, SRI, FITZPATRICK

Name of Allegor: \* N/A Home Address: \* \_\_\_\_\_

Home Phone: \* \_\_\_\_\_ City/State/Zip: \* \_\_\_\_\_

Allegor's Employer: \_\_\_\_\_ Allegor's Position/Title: \* \_\_\_\_\_

Facility: J. A. FITZPATRICK Docket No. or Materials License No.: 50-333

Was: allegor informed of NRC identity protection policy? Yes N/A No \_\_\_\_\_  
If a licensee employee or contractor, did they raise the issue to their management? Yes N/A No \_\_\_\_\_  
Was confidentiality requested? Yes N/A No \_\_\_\_\_  
Was confidentiality initially granted? Yes N/A No \_\_\_\_\_  
Individual Granting Confidentiality: \_\_\_\_\_

**Criteria for determining whether the issue is an allegation:**

Is it a declaration, statement, or assertion of impropriety or inadequacy? Yes / No  
Is the impropriety or inadequacy associated with NRC regulated activities? Yes / No  
Is the validity of the issue unknown? Yes / No

If No to any of the above questions, the issue is not an allegation and should be handled by other appropriate methods (e.g. as a request for information or an OSHA referral).

**Allegation Summary or staff suspected wrongdoing (brief description of concern(s)):**

THE GENERAL MANAGER SITE SUPPORT, MIKE COLOMB, NOTIFIED ME THAT FOLLOWING A REVIEW A FIRE PROTECTION ENGINEER (JOSEPH PECHACEK) AND THE SECURITY MANAGER (THOMAS TIERKE), NYPA DETERMINED THAT A COMBUSTION CONTROL PERMIT ISSUED ON OCTOBER 18, 1994 HAD A FORGED SIGNATURE ON THE FIRE PROTECTION SYSTEM ENGINEER APPROVAL BLOCK. THE INDIVIDUAL SUSPECTED OF FORGING THE SIGNATURE (\_\_\_\_\_) A FIRE PROTECTION SUPERVISOR/FIRE INSPECTOR); AFTER REPEATED QUESTIONING, CONFESSED TO DOING SO, AND HAS BEEN ESCORTED OFF SITE AND ACCESS DENIED. NYPA IS CONTINUING THE INVESTIGATION OF THIS DOCUMENT FORGING AND OTHER RELATED COMBUSTIBLE PERMIT ADMINISTRATIVE CONTROL CONCERNS.

Number of Concerns: ONE \* EXHIBIT 2  
Type of Regulated Activity (a) XX Reactor (d) \_\_\_\_\_ Safeguards PAGE 1 OF 9 PAGE(S)  
(b) \_\_\_\_\_ Vendor (e) \_\_\_\_\_ Other: \_\_\_\_\_ (Specify)  
(c) \_\_\_\_\_ Materials  
Functional Area(s): (a) \_\_\_\_\_ Operations (a) \_\_\_\_\_ Emergency Preparedness  
(b) \_\_\_\_\_ Construction (f) \_\_\_\_\_ Onsite Health and Safety  
(c) \_\_\_\_\_ Safeguards (g) \_\_\_\_\_ Offsite Health and Safety  
(d) \_\_\_\_\_ Transportation XX (h) Other: FIRE PROTECTION

\* These sections are not completed for instances of potential wrongdoing identified by NRC staff.

Distribution: SAC \_\_\_\_\_ OI \_\_\_\_\_ \* F/U OF F.P. Administrative Control problems appears warranted (initial rec in incident staff)

Information in this record was deleted in accordance with the Freedom of Information Act, exemptions 7C, 99-76, FOIA.

ORIGINAL PERMIT

COMBUSTIBLE CONTROL PERMIT

SECTION 1: Requestor Information

Name: Steve Abbott Department: Res Permit No: 94-104  
Supervisor: Ted Bergin Signature: [Signature] Date: 9-9-94  
Extension: 6734

Qty of Ordinary Combustibles 2 000's of Hepa Filters (Packaging only) Amount: \_\_\_\_\_

Qty of Combustible/Flammable Liquids & Gases \_\_\_\_\_ CLASS \_\_\_\_\_ Amount: \_\_\_\_\_

Reason Temporary Storage is Needed Normal maintenance

Work Order or Document No: \_\_\_\_\_ Expected Duration: \_\_\_\_\_  
Building: \_\_\_\_\_ Elevation: \_\_\_\_\_  
Description of Area \_\_\_\_\_

SECTION 2: Fire Protection Department Evaluation

Fire Zone Number/Fire Area: TA 5H-1 Exemption Area  Yes  No (circle one)

- Answer YES or NO or NA
- Smoke/Heat detection operable in area
- Hose stations operable in area
- Fire suppression systems operable in area
- Combustibles located to minimize exposure to vital equipment/access/egress
- Safe shutdown equipment within the zone
- Are flammable liquids constantly attended in safe shutdown areas
- Additional fire protection required
- Restriction/Pre-Cautions, compensatory measures, record below:  
DO NOT OBSTRUCT EXIT PATHWAYS
- Must be reviewed by the Fire Protection System Engineer

Time Needed: 9/9/94 Date Issued: 9/9/94 Date Expires: 10/9/94  
(Not to Exceed 30 or 90 days)

Is this a renewal? YES ( ) NO (X) If yes, state reason: \_\_\_\_\_  
Approved: [Signature]  
Fire Protection Supervisor/Fire Protection System Engineer

SECTION 3: Permit Closure

All transient combustibles listed have been removed from the area.  
Filed By: [Signature] 10/3/94  
Fire Protection Supervisor Date

COMBUSTIBLE CONTROL PERMIT

SECTION 1: Requestor Information

Name: Robert Abbott  
Supervisor: TED BERGAL

Department: SES  
Signature: Bob Abbott

Permit No: 2422  
Date: 2/1/87  
Extension: 222  
Extension: \_\_\_\_\_

List of Ordinary Combustibles

9 Boxes of Wood Shavings

Amount

List of Combustible/Flammable Liquids & Gases

Class

Amount

Reason Temporary Storage is Needed

Wood Shavings

Work Order or Document No: \_\_\_\_\_

Expected Duration: \_\_\_\_\_

Building: \_\_\_\_\_

Elevation: \_\_\_\_\_

Description of Area: \_\_\_\_\_

SECTION 2: Fire Protection Department Evaluation

Fire Zone Number/Fire Area: 2A Steel

Exemption Area Exd No

(circle one)

Answer YES or NO or NA

NA Smoke/Heat detection operable in area

YES Hose stations operable in area

YES Fire suppression systems operable in area

YES Combustibles located to minimize exposure to vital equipment/access/eqr

YES Safe shutdown equipment within the zone

NA Are flammable liquids constantly attended in safe shutdown areas

NA Additional fire protection required

NA Restriction/pre-cautions, compensatory measures, record below:

Permit Restrictions: 1. No Smoking 2. No Open Flames

Date Needed: 2/1/87

Date Issued: 2/1/87

Date Expired: 2/1/87

(Not to exceed 30 or 90 da

(a this a renewal? YES (X) NO ( ) If YES state reason: NA

Fire Protection Supervisor/Fire Protection System Engineer: Bob Abbott

SECTION 3: Permit Closure

All combustibles listed have been removed from the area.  
Verified By: Bob Abbott Fire Protection Supervisor: Bob Abbott

From: JOSEPH PECHACEK  
To: JAFSR016.JTEIFKT  
Date: 1/30/95 7:37am

*Fitzpatrick*  
*Fitzpatrick*

Tom, *Jeff*, *Fitzpatrick*

We had an instance in fire protection recently where I noticed that my name had been signed to a plant document by someone other than myself. The affected document was a Combustible Loading Permit. Fire protection has spoken to Tanick in QA about the issue and B. MacDonald is currently preparing a critique. Unfortunately, the individual whom is suspected of signing my name to the document has not directly admitted to doing so even though they have been directly asked on at least 4 different occasions. Their current answer to the question has been "I could have". My question is this- The plant is pursuing with their own investigation and disciplinary action as determine necessary. Do I personally (legally) have any avenues available to address this issue? I guess that the infraction is forgery isn't it? Feel free to call me on extension 5876.

Thanks,  
Joe P.

2/12/95

6 - What say you, name and job title?

7 -  an a Eric Rothman, Supervisor / Vice Shop Extra at the City Park Nuclear Power Plant. 7C

8 - On September 9, 1994 did you fill out section 7 of a Limestone Control Permit number 94-104 for Bruce Abbott?

- Yes or No?

- What did the permit address?

- Does it apply to the on level 272 of the Greenell EXHIBIT 2

PAGE 5 OF 9 PAGE(S)

- When did the permit come to your attention again?

- I believe it was October 18, 1994

- Why did you then name some up again?

(2)

7 - Because the original permit was 94-104 and expired and the 3 sets of files had not been removed yet.

7 - Did a second permit have to be filed out?

Yes

1 - Who initiated the new permit

7 - Bruce Abbott & Dale Bryson's deposition over the phone

1 - What part did he fill out

1 - None filled out

7 - ~~Department of the permit~~  
1 - Do you know the date and number of the permit?

1 - Order 18, 1994 number 94-120

1 - Did you fill in section II

Yes & No

Q - Did you fill in the bottom section of number II?

A - Yes I did.

Q - Are you authorized to sign the authorization for the permit?

A - No.

Q - Who's signature is on this permit?

A - Joe Padack

Q - Did you sign his name?

A - Yes I did.

Q - Why did you this?

A - Because the permit needed to be renewed and he wasn't around and I was trying to get the job done.

EXHIBIT 2

Q - Did you realize it at the time?

(4)

that you were forging this signature

7 - No I did not.

1 - Did you have Peckback's permission to do this?

- No

- Have you or other signed permit for Peckback's Matchak or Mc - Donald in the past? (all the fire inquiries) 7c

- Yes

- Did you have their permission to do this?

- No

- Do you know that the permit is an official plant record?

- Yes

- Do you want to add any thing to your statement?

(5)

A - The only reason I signed Pecharak's name was because this was a renewal and not a new issue.

Michael Durvahl

Michael Durvahl



Thomas H. Feitel

Thomas H. Feitel



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION II  
101 MARIETTA STREET, N.W., SUITE 2900  
ATLANTA, GEORGIA 30323-0199

JAN 17 1994

Mr. Douglas W. Harrison

[REDACTED]

b7c  
47c

Dear Mr. Harrison:

SUBJECT: RII-93-A-0031 & 96 - QUESTIONABLE FIREWATCH PRACTICES

This refers to your conversation on February 2, 1992, with Mr. Joel Munday of our staff, and your Department of Labor complaint in which you expressed a concern related to firewatch practices at the Browns Ferry Nuclear Plant.

Our review regarding the firewatch concern has been completed and our findings are documented in the enclosure to this letter. Based on the information provided, we were unable to substantiate the allegation.

This concludes the staff's activities regarding the firewatch concern. We will continue to monitor your Department of Labor complaint. We appreciate your cooperation and assistance.

Sincerely,

Bruno Uryc, Acting Director  
Enforcement and Investigation  
Coordination Staff

Enclosure:  
Allegation Evaluation Report

Information in this record was deleted  
in accordance with the Freedom of Information  
Act, exemptions b7c  
FOIA- 99-76

5/17

Certified Mail No. P 291 211 579

2-93-030

EXHIBIT 3  
PAGE 1 OF 3 PAGE(S)

**ALLEGATION EVALUATION REPORT**

**ALLEGATION NUMBER RII-93-A-0031 & 96**

**INADEQUATE FIREWATCHES**

**TENNESSEE VALLEY AUTHORITY**

**BROWNS FERRY NUCLEAR PLANT UNITS 1, 2 AND 3**

**DOCKET NUMBERS 50-259, 50-260 AND 50-296**

**1. STATEMENT OF ALLEGATION**

The concerned individual (CI) stated that a firewatch was required to stay at the job site for 30 minutes following completion of all "hot work", (welding, grinding, etc.)

**2. SUMMARY OF CONCERNS**

The CI indicated that craft persons were swapping off the firewatch duties with other members of the work force. If a data taker was needed then another craft would be the firewatch. The purpose of this was to minimize the number of firewatches. Additionally, the firewatch was to remain in the area for 30 minutes following the completion of a "hot job". The CI indicated that they were told to work the entire time that they were in the drywell and not to remain for the 30 minutes. The CI stated that there were two permanent fire watches on each level in the drywell, each watching 180 degrees. The CI stated that the licensee takes credit for these firewatches covering the hot jobs during the 30 minute cooldown. The CI was concerned that the two firewatches could not see all the hot jobs in there area due to equipment interference.

**3. EVALUATION**

Following receipt of the allegations, the inspector toured the Unit 3 drywell for evidence of the problem discussed in the allegation. None was found. This inspection was documented in Inspection Report 93-07. The findings of the inspection report are as follows:

On March 5, 1993, the inspector made a tour of the Unit 3 drywell. Overall the drywell was clean and free of combustible material. The inspector noted that many hot jobs were in progress which required firewatches. Each job had its own firewatch. Blankets and catch pans were used in many places to prevent slag from dropping to a lower elevation. The inspector reviewed the welding and

EXHIBIT 3

PAGE 2 OF 3 PAGE(S)

grinding permits posted and verified the information required was documented properly. The inspector found no deficiencies.

**4. CONCLUSIONS**

Based upon the above inspection findings, the allegations are unsubstantiated and are closed.

EXHIBIT 3

PAGE 3 OF 3 PAGE(S)

EICS ROUTING SHEET

TO: OI

WAC  
FYI

SUBJECT:

REQUEST STATUS AND WHEN ACTION IS EXPECTED TO BE COMPLETED.

ACTION/	INFO:
<input type="checkbox"/> ATB	<input type="checkbox"/>
<input type="checkbox"/> OXD	<input type="checkbox"/>
<input type="checkbox"/> AJI	<input type="checkbox"/>
<input type="checkbox"/> LMS	<input type="checkbox"/>
<input type="checkbox"/> LJW	<input type="checkbox"/>
<input type="checkbox"/> BXU	<input type="checkbox"/>

REMARKS:

NOTE AND DESTROY

NOTE AND RETURN

CORRECTION REQUIRED

PLEASE PROVIDE COMMENTS

PLEASE ANSWER THIS

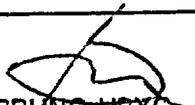
INFORMATION

PLEASE SEE ME ON THIS

YOUR ACTION REQUIRED

PER CONVERSATION

FILE WITH CASE NO:

  
BRUNO URYC

JAN - 5 1996

Information in this record was deleted  
in accordance with the Freedom of Information  
Act, exemptions b7c  
FOIA- 99-76

5/7/8

YOUR ACTION REQUIRED BY:

2-93-030  
Recd. 1/10/96  
SAR



# Stone & Webster

ATLANTA GA  
BOSTON MA  
CHATTANOOGA TN  
CHERRY HILL NJ  
DENVER CO  
HOUSTON TX  
NEW YORK NY  
WASHINGTON DC  
MIAMI FL  
PLEASANTON CA

ABU DHABI UAE  
AL KHOBAR SAUDI ARABIA  
BANGKOK THAILAND  
DAMMAM SAUDI ARABIA  
KUALA LUMPUR MALAYSIA  
KUWAIT CITY KUWAIT  
MILTON KEYNES ENGLAND  
JAKARTA INDONESIA  
SEOUL KOREA  
TORONTO CANADA

**VIA FEDERAL EXPRESS**

January 3, 1996

Ellis W. Merschoff, Director  
Division of Reactor Projects  
United States Nuclear Regulatory Commission  
Region II  
101 Marietta Street, N.W., Suite 2900  
Atlanta, GA 30323-0189

Re: NRC Consideration of Enforcement Action  
in Harrison v. Stone & Webster, No. 93-ERA-044

Dear Mr. Merschoff:

This responds to your letter to me dated December 27, 1995, seeking information on Stone & Webster's compliance with the Orders of the Secretary of Labor in the captioned case.

You will recall that you discussed this letter on December 28, 1995 with Michael McInerny of this office and Robert Rader of Winston & Strawn, Stone & Webster's outside counsel. My letter will summarize our statements to the NRC during that conversation and affirm our intention to be in full compliance with all Orders of the Secretary. This will also confirm your explanation to our counsel that your letter of December 27, 1995 seeks information related only to the back pay and attorney's fees issue, and that the corrective actions outlined by Stone & Webster at the predecisional enforcement conference on October 30, 1995 need not be revisited. However, we have attached two exhibits from that conference which summarize the corrective actions presented that day.

As our counsel explained, the Secretary's Decision and Order of August 22, 1995 directed Stone & Webster to compensate Mr. Harrison for the \$2.00 an hour differential between lead foreman and foreman wages from February 2, 1993 until his uncontested lay-off on April 14, 1993. The Secretary further awarded Harrison "costs and expenses, including attorney fees, reasonably incurred in bringing the complaint," and granted Mr. Harrison 20 days to submit any petition for such costs and expenses, and Stone & Webster an additional 20 days to respond. See Decision and Order at p.17. As is customary in such cases, it would then be up to the Secretary to determine precisely what amounts in costs and attorney's fees would be awarded Mr. Harrison, based on the parties' submissions.

**Stone & Webster Engineering Corporation**  
P.O. Box 2325, Boston, Massachusetts 02107-2325  
245 Summer Street, Boston, Massachusetts 02210  
Tel: 617-589-5111 Fax: 617-589-2156

Ellis W. Merschoff, Director  
January 3, 1996  
Page 2

On October 16, 1995, Stone & Webster filed an Application for Stay with the Secretary, seeking to stay enforcement of his Decision and Order as regards back pay and costs and expenses.

Before the Secretary acted upon the Application for Stay, Stone & Webster submitted a letter dated December 5, 1995, providing additional information in support of a stay. First, we pointed out that Mr. Harrison had discharged his former counsel and obtained new counsel. Second, we noted that his new counsel had informed us that Mr. Harrison had filed or would shortly be filing for bankruptcy protection. Under these circumstances, we observed that Stone & Webster could be prejudiced by making payments to Mr. Harrison or his former attorney if these amounts became tied up on the bankruptcy proceeding (e.g., the risk that back pay or attorney's fees, if paid, would become part of the bankrupt's estate or the possibility that Mr. Harrison's indebtedness to his former counsel for attorney's fees was discharged in bankruptcy). Accordingly, we urged the Secretary to grant the requested stay.

On December 13, 1995, the Secretary issued an Order Denying Application for Stay. The Secretary did not, however, mention the information provided by Stone & Webster in its December 5, 1995 letter. Also, because the Secretary held that Stone & Webster had not sufficiently shown how it would be irreparably injured absent a stay, we concluded that the Secretary had not received the supplemental information in our December 5, 1995 letter.

Accordingly, Stone & Webster filed with the Secretary on December 22, 1995 a Motion for Reconsideration of the Secretary's December 13, 1995 Order denying the stay. We discussed the supplemental information and its application to the traditional criteria for issuing a stay, and asked the Secretary to grant the stay upon reconsideration.

As a result of the recent Government furloughs, the status of Stone & Webster's motion for reconsideration is unclear. At this point, we can only say that we have received no word that the Secretary has acted upon the motion. From a procedural perspective, we do not believe that the issue of a stay can or should be raised before the United States Court of Appeals for the Eleventh Circuit until the Secretary has acted finally by ruling upon the motion for reconsideration.

To clarify one of the specific points of your letter, we wish to emphasize that the Secretary of Labor has not order Stone & Webster to pay Mr. Harrison or his attorney any sum certain in litigation costs and attorney's fees. Mr. Harrison's petition for those costs is still pending review by the Secretary. As you know, the Secretary has authority under Section 211 of the Energy Reorganization Act to award all or only a portion of the costs and attorney's fees sought by a successful complainant. Therefore, although Stone & Webster

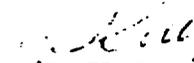
Ellis W. Merschoff, Director  
January 3, 1996  
Page 3

has not opposed Mr. Harrison's petition for costs and attorney's fees, we cannot predict whether the Secretary, in his broad discretion, will award all of the costs and fees requested.

Although Stone & Webster has filed a motion for reconsideration, we wish to assure the NRC of our absolute commitment to comply with all orders of the Secretary. To demonstrate our commitment, we have undertaken, notwithstanding the pending motion for reconsideration, to compensate Mr. Harrison forthwith for the wage differential determined by the Secretary in his Decision and Order. As our counsel further advised you, we will await the Secretary's direction with regard to a sum certain to be paid for any costs and attorney's fees subsequently allowed by the Secretary.

Please call me if you have any questions regarding this response.

Sincerely,

  
R. B. Kelly  
President  
Stone & Webster Engineering Corporation

encl.

cc: Secretary of Labor  
Office of Administrative Appeals  
U.S. Department of Labor  
200 constitution Avenue, N.W.  
Room S4309  
Washington, D.C. 20210

United States Nuclear Regulatory Commission  
Document Control Desk  
Washington, D.C. 20555

l:\mtm\mershof.ltr

**NRC ENFORCEMENT CONFERENCE**

**EFFECTIVENESS OF SWEC**

**EMPLOYEE CONCERNS PROGRAM VERIFIED**

- SWEC ACTIONS TO IMPROVE QUALITY OF WORK ENVIRONMENT IN RAISING SAFETY CONCERNS IN RESPONSE TO NRC LETTER OF AUGUST 26, 1993 IN UNRELATED SECTION 211 CASE.
  - ISSUED MEMORANDUM OF SEPTEMBER 14, 1993 FROM C.R. BISHOP TO ALL SUPERVISORS AND MANAGERS SUMMARIZING SWEC EMPLOYEE CONCERNS PROGRAM AND INITIATING ROLL-DOWN TO EMPLOYEES.
  - CONDUCTED FOLLOW-UP SURVEY TO DETERMINE KNOWLEDGE AND USE OF ECP ON OCTOBER 6 AND 11, 1993. RESULTS SHOWED NO EVIDENCE OF CHILLING EFFECT IN WILLINGNESS TO REPORT EMPLOYEE CONCERNS.
  - CRAFT AWARENESS OF AVAILABLE PROCESSES FOR REPORTING QUALITY/SAFETY CONCERNS REINFORCED AT MEETING BY SWEC FIELD MANAGER IN OCTOBER 1993.
- INSPECTION ACTIVITIES BY NRC AUDITED EFFECTIVENESS OF SWEC ECP ON NOVEMBER 8-10 AND 22-24, 1993 AND CONFIRMED SWEC PERSONNEL NOT RELUCTANT TO REPORT POTENTIAL SAFETY/QUALITY CONCERNS.
  - EMPLOYEES SURVEYED UNANIMOUSLY (EXCEPT ONE SWEC EMPLOYEE ON FIRST DAY AT BROWNS FERRY) STATE NO RELUCTANCE TO RAISE SAFETY/QUALITY CONCERNS TO SUPERVISION, SWEC ECP OR TVA CRS, OR NRC.
  - NRC CONCLUDES, BASED ON CURRENT AND EARLIER SURVEYS, THAT AWARENESS AND KNOWLEDGE OF CONTRACTOR AND LICENSEE PROGRAMS HAVE INCREASED.

- **SWEC PERFORMS ANOTHER RANDOM SURVEY TO EVALUATE POTENTIAL CHILLING EFFECTS. WHICH CONCLUDES THAT SWEC EMPLOYEES ARE WILLING TO REPORT SAFETY/QUALITY CONCERNS WITHOUT FEAR OF REPRISAL.**
- **TVA OIG JULY 1994 SURVEY SHOWS THAT BROWNS FERRY EMPLOYEES "OVERWHELMINGLY FELT FREE TO RAISE NUCLEAR SAFETY CONCERNS TO THEIR SUPERVISION AND MANAGEMENT."**
- **SWEC DISTRIBUTES JANUARY 1995 MEMORANDUM TO ALL ONSITE EMPLOYEES SUMMARIZING ECP.**
- **TVA OIG ANNUAL REVIEW OF SWEC ECP ON SEPTEMBER 11-15, 1995 DEMONSTRATES THAT ALL BROWNS FERRY PERSONNEL SURVEYED WOULD REPORT SAFETY/QUALITY CONCERNS TO THEIR SUPERVISORS OR THROUGH OTHER AVAILABLE PROCESSES.**
- **OCTOBER 2, 1995 TOOL BOX MEETING AND POSTINGS AT KEY SITE LOCATIONS RE-EMPHASIZE SWEC MANAGEMENT EXPECTATION THAT EMPLOYEES WILL REPORT SAFETY/QUALITY CONCERNS AND SHOULD FEEL FREE TO DO SO.**

**COMBINED SWEC/TVA PROGRAMS PROVIDE EFFECTIVE ASSURANCE TO EMPLOYEES WISHING TO RAISE SAFETY/QUALITY CONCERNS.**

## **NRC ENFORCEMENT CONFERENCE**

### **SUMMARY AND CLOSING REMARKS**

- **SWEC MANAGEMENT REMAINS COMMITTED TO FREE AND OPEN EMPLOYEE DISCUSSION OF SAFETY CONCERNS AT ALL LEVELS, AND WILL NOT TOLERATE ANY INTIMIDATION, HARASSMENT OR DISCRIMINATION AGAINST EMPLOYEES.**
  - **SWEC MANAGEMENT HAS REPEATEDLY REINFORCED ITS EXPECTATION.**
  - **THE EFFECTIVENESS IN COMMUNICATING MANAGEMENT'S EXPECTATIONS HAS BEEN VERIFIED.**
- **SWEC WILL CONTINUE TO MONITOR EFFECTIVENESS OF ITS ECP AND TO EMPHASIZE ITS AVAILABILITY TO ALL SWEC EMPLOYEES.**

- IN HARRISON'S CASE, THE SWEC ECP REPRESENTATIVE THOROUGHLY INVESTIGATED HARRISON'S FIRE WATCH AND EMPLOYMENT CONCERNS. HARRISON EXPRESSED NO DISSATISFACTION WITH ECP'S HANDLING OF HIS CONCERNS.
- TVA AND NRC OI ALSO REVIEWED ALLEGATIONS AND FOUND NO DISCRIMINATION.
- FIRST AND SECOND LEVEL DOL REVIEWS FOUND THAT SWEC MANAGERS AND SUPERVISORS REDUCED HARRISON FROM LEAD FOREMAN POSITION FOR LEGITIMATE, NON-DISCRIMINATORY REASONS IN REDUCING MANPOWER COSTS.
- SWEC APPEAL TO U.S. COURT OF APPEALS WILL DETERMINE VALIDITY OF SECRETARY'S DECISION REFUSING TO ACCEPT FACT-FINDING BY ADMINISTRATIVE LAW JUDGE.
- IN THIS CASE, NO DISCRIMINATION OCCURRED. BUT IF NRC NOW DISAGREES, COMPELLING REASONS EXIST TO EXERCISE ENFORCEMENT DISCRETION OR, AT A MINIMUM, TO AWAIT COMPLETION OF DOL PROCEEDINGS THROUGH APPEAL.



ATLANTA, GA  
BOSTON, MA  
CHATTANOOGA, TN  
CHERRY HILL, NJ  
DENVER, CO  
HOUSTON, TX  
NEW YORK, NY  
WASHINGTON, DC  
MIAMI, FL  
PLEASANTON, CA

# Stone & Webster

FOUNDED  
1889

ABU DHABI, UAE  
AL KHOBAR, SAUDI ARABIA  
BANGKOK, THAILAND  
DAMMAM, SAUDI ARABIA  
KUALA LUMPUR, MALAYSIA  
KUWAIT CITY, KUWAIT  
MILTON KEYNES, ENGLAND  
JAKARTA, INDONESIA  
SEOUL, KOREA  
TORONTO, CANADA

VIA FEDERAL EXPRESS

January 03, 1996

George Huddleston, Esquire  
5133 Selkirk Drive  
Birmingham, AL 35242

Re: Stone & Webster Engineering Corporation v. Robert Reich, Secretary of  
Labor, No. 93-ERA-44 (DOL), Case No. 95-6850 (11th Cir.)

Dear Mr. Huddleston:

The Decision and Order of the Secretary of Labor dated August 22, 1995 directed Stone & Webster "to compensate Complainant for the two dollar an hour differential between lead foreman and foreman wages from February 2, 1993 until the April 14, 1993 layoff."

As you are aware, Stone & Webster sought a stay of this and other portions of the Secretary's Order, and also sought reconsideration of the Order denying the stay.

Notwithstanding its request for reconsideration, Stone & Webster has decided to render Mr. Harrison the aforementioned compensation at this time. Enclosed is a check to Mr. Harrison in the amount of [REDACTED] which represents the compensation owed him, minus standard payroll withholdings. The pre-tax figure was calculated by multiplying Mr. Harrison's hours of work between the dates described [REDACTED] by the \$2.00 differential cited in the Secretary's Order. The true differential between a lead foreman rate and that of a general foreman is in fact much less than \$2.00, but we have given Mr. Harrison the benefit of the higher rate to avoid any dispute.

This payment is without prejudice to Stone & Webster's right to recover such compensation if the Court of Appeals reverses the Secretary's decision.

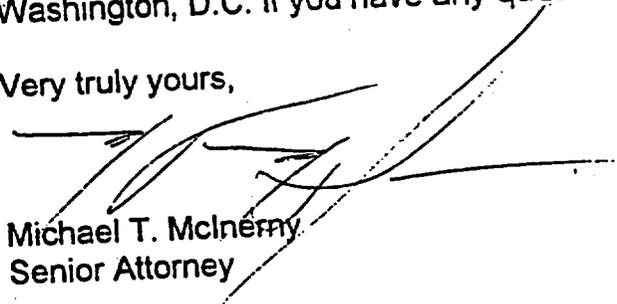
Stone & Webster Engineering Corporation  
P.O. Box 2325, Boston, Massachusetts 02107-2325  
245 Summer Street, Boston, Massachusetts 02210  
Tel: 617-589-5111 Fax: 617-589-2158

470  
36

George Huddleston, Esquire  
January 03, 1996  
Page two

Kindly contact me or Mr. Robert Rader of Winston & Strawn in Washington, D.C. if you have any question in this regard.

Very truly yours,



Michael T. McInerney  
Senior Attorney

MTM:hs  
encl.

cc: Secretary of Labor  
Office of Administrative Appeals  
U.S. Department of Labor  
200 Constitution Avenue, N.W.  
Room S4309  
Washington, D.C. 20210

Ellis W. Merschoff, Director  
Division of Reactor Projects  
United States Nuclear Regulatory Commission  
Region II  
101 Marietta Street, N.W., Suite 2900  
Atlanta, GA 30323-0189

United States Nuclear Regulatory Commission  
Document Control Desk  
Washington, D.C. 20555



STONE & WEBSTER ENGINEERING CORPORATION  
ATHENS, ALABAMA

620

DATE  
1-2-96

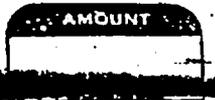
EMPLOYEE NO.  
150649

120-02  
CHECK NUMBER  
01-262432

TO THE  
ORDER OF

D. W. HARRISON

NOT VALID AFTER 30 DAYS FROM ISSUE



PAY EXACTLY\*\*\*\*\*

STONE & WEBSTER ENGINEERING CORPORATION  
PAYROLL ACCOUNT NO. 1

AM SOUTH  
DECATUR, AL

*D. G. Haste*  
AUTHORIZED SIGNATURE

⑈ 26 24 3 2 ⑈ ⑆ 06 20000 1 9 ⑆ 1 780 3888 ⑈

STONE & WEBSTER ENGINEERING CORPORATION

GROSS AMT.	HOURS	DESCRIPTION	OTHER DED.	AMOUNT	EMPLOYEE NAME
		Retro pay adj.			D. W. Harrison
					SOCIAL SECURITY NO.
					BADGE NO.
					15049
					PERIOD ENDING
					01-07-96
					CHECK NO.
					01-262432
TOTAL YOU EARNED	DEDUCTIONS			TOTAL OTHER DEDUCTIONS	NET PAY
	FED. WITH.	FICA	STATE	CITY	SDI
YEAR TO DATE					
GROSS	FED. WITH.	FICA	STATE	CITY	SDI

DETACH AND RETAIN  
THIS RECEIPT AS  
YOUR RECORD OF  
EARNINGS AND TAX  
PAYMENTS.

LTR BPS No. 33: ALLEGATION ACTION PLAN (2 Pages)

ALLEGATION ACTION PLAN  
ALLEGATION NO. RIII- 94 -A- 0118

Licensee: D.C. Cook

Docket/License No: 50-315 50-316

Assigned Division: DRS

Attached Pertinent Documents: 1. Memo from Darrell Schrum dated 6/20/94.  
2. Memo from Don Funk dated 8/2/94.

I. Division Action

- A. Prepared by: H. A. Walker 8/16/94  
Technical Staff Date
- B. Reviewed by: W.D. Sheffer 8/16/94  
Section Chief Date
- C. Approved by: [Signature] 8/16/94  
Branch Chief Date

II. Allegation Review Board Action

Allegation Review Board Membership

Approved As Is

Approved with Modifications as Documented in Plan.

Disapproved for Following Reasons:

Yes  No OI Referral

*I question whether this issue was an allegation to the first place. Are we now to place all licensee identified issues into the allegation system? JW.*

Information in this record was deleted in accordance with the Freedom of Information Act, exemptions 7C  
FOIA- 99-76

Allegation Review Board Chairman

Date

*5/7/99*

ALLEGATION/PERIPHERAL ISSUE ACTION PLAN

Concerns and any peripheral issues associated with a concern should be documented on a separate page. Each concern and peripheral issue, if any, should be documented in the followup report as is stated in this plan. If there are several concerns in one area, one page can be used. Otherwise, a separate page should be used for each concern.

Concern No.

Peripheral Issues Associated with  
Concern No.

I. Action Evaluation: The following method of resolution is recommended (circle):

- A. Send to Licensee Requesting Response in \_\_\_ Days with RIII Followup\*
- B. Priority RIII Followup
- C. Followup During Routine Inspection Within 60 Days
- D. Followup with Assistance from OI
- E. No Action - Outside NRC's Charter (describe basis below)
- F. No Action - Without Merit (describe basis below)
- G. Refer to \_\_\_\_\_
- H. Other (specify)

\* If the proposal is to send to the licensee, the Action Plan should describe the general areas we expect the licensee to address.

II. Inspector's Actions: The following areas at a minimum will be reviewed during the inspection into the above mentioned concern and/or peripheral issue.

A. Objective

B. Methods

1. Persons to be contacted:
2. Documents and/or activities to be reviewed:
3. Time period to be covered:
4. Locations/specific areas to visit:
5. Other areas (specify):

Allegation No. RIII- 94-A-0118

ALLEGATION ACTION PLAN

Allegation Number RIII-94-A-0118

This allegation involves the falsification of fire watch records. The problem was identified by licensee personnel and significant action, as documented in attachment 1, has been taken. This attachment also indicates that some follow up was provided by a Region III inspector in June of this year (Inspection Report 315/316/94012(DRS)).

The problem appears to involve one individual, who no longer works at DC Cook. Little could be gained by additional inspection. We therefore recommend that no additional inspection be performed and that the allegation be closed by a memorandum to file.

From: Darrell L. Schrum (DLS3)  
To: CH2:JLB5 *James L. Belange, RIII*  
Date: Monday, June 20, 1994 1:37 pm  
Subject: FALSIFICATION/FIREWATCH TOURS/D.C.COOK -R

I don't believe I mentioned the word "falsification". They had problems with missed fire watches. I did not have time to see if these problems involved falsification. The fire protection supervisor stated that about 20 people were fired since the start of the year when they didn't live up to expectations. The licensee is taking action when a problem is found in the fire watch program. The licensee had taken extensive actions to improve the program. The ~~██████~~ involved in the previous falsification of fire watch records no longer is employed at D.C. Cook. No new problems had occurred during the last two months. I don't think much will be gained by persuing the problems that occurred earlier this year. Attached is the fire watch input that was in my report - 315/316/94012.

CC: def - *██████* *F.R. EXC/RIII*  
Files: a:fdcc

## FALSIFICATION OF RECORDS FOR FIRE WATCH ROUNDS AT D.C. COOK

I talked to Patrick Russell and Walter Hodge about the [redacted] who falsified the fire watch check lists at D.C. Cook. They stated that the [redacted] is on the "bad guy list". [redacted] was interviewed in April during the investigation for the falsification even though [redacted] is no longer employed at the plant. [redacted] denied falsifying the records. [redacted] had the right of appeal. The time limit for the appeal is currently expired. The [redacted] name is included in the Index Program as an unfavorable employee. Currently 20 utilities are included in the Index Program. The [redacted] must sign for release of information to gain employment at another utility. The results of the investigation would be available to the other utilities. For those utilities not included in the Index Program the normal method of employment would be to send an "Exchange 9103 Transfer" form that requests information on the employee. D.C. Cook is responsible to pass on the information from the investigation. Walter Hodge stated that with the information from the investigation no one would grant access to [redacted]

72

Section 3.3 of Inspection Report 315/316/94012(DRS) dated June 15, 1994.

### 3.3 Fire Watches

Missed fire watch inspections for impairments had been a problem during the early part of this year. A new contractor had been hired. As a result new fire watches lacked training and an awareness of the importance of their fire watch responsibilities. These problems were corrected. Some of the contractor's employment was terminated when they did not measure up to expectations. The licensee took additional corrective actions as needed. An improved fire watch training program was implemented to enhance the learning of fire watch tasks. In addition, all supervisors are now required to identify new impairments (and its location) to fire watch personnel to ensure the correct areas are inspected.

On a sample basis, fire protection management were making spot checks to ensure that fire watches were doing their job. Quality assurance (QA) surveillances were also being conducted on the fire watches as they made their inspections. No problems with the one hour fire watch requirement being violated were found during these QA surveillances. The corrective actions for the fire watch problems appeared to be effective.

August 2, 1994

**MEMORANDUM FOR:** Geoffrey Grant, Director, Division of Reactor Safety  
**FROM:** Donald E. Funk Jr., Office Allegation Coordinator  
**SUBJECT:** ALLEGATION RE: FALSIFICATION OF FIREWATCH RECORDS  
AT D.C. COOK (AMS NO. RIII-94-A-0118)

On July 18, 1994, this matter was discussed with E. T. Pawlik of the Office of Investigations Region III Field Office, and it was concluded that investigative effort by OI:RIII may be warranted for the reason given below. Should additional facts or information relating to possible wrongdoing concerning this allegation become available, please notify me promptly.

This allegation will continue to be carried as "open" in the Allegation Management System pending final resolution/closeout by your Division.

Original signed by  
Donald Funk

Donald E. Funk Jr.  
Office Allegation Coordinator

**Attachments:**

1. AMS Form
2. 7/6/94 J. Belanger memo

**cc w/attachments:**

RAO:RIII  
DRP:RIII  
RC:RIII  
OI:RIII  
G. C. Wright  
W. D. Shafer  
J. R. Creed

**BASIS:** Since willful wrongdoing was alleged, falsification of firewatch records, DRS should convene an Allegation Review Board, with OI and RC present.

ALLEGATION MANAGEMENT SYSTEM

ALLEGATION NUMBER - R111-94-A-0118

RUN DATE: 08/02/94

DOCKET/FACILITY/UNIT: 05000315 / COOK 1  
DOCKET/FACILITY/UNIT: 05000316 / COOK 2  
DOCKET/FACILITY/UNIT: /  
DOCKET/FACILITY/UNIT: /

ACTIVITY TYPES - OTHER  
FIREWATCH

MATERIAL LICENSES -

FUNCTIONAL AREAS - ONSITE HEALTH AND SAFETY

DESCRIPTION - FALSIFICATION OF FIREWATCH RECORDS

CONCERNS -  
1

SOURCE - LICENSEE IDENTIFIED

CONFIDENT - NO

RECEIVED - 940512 BY - J. ISOM / DRP

ACTION OFFICE CONTACT - WD SHAFER

RESPONSIBLE PGM OFFICE - R VIOLATION SECTION 210 ALLEGED - NO

STATUS - OPEN SCHED COMPLETION - 940912 DATE CLOSED -

ALLEGATION SUBSTANTIATED - ALLEGER NOTIFIED - NO

OI ACTION - OI REPORT NUMBER -

REMARKS - RECEIPT 7/6/94 BELANGER MEMO. IR NO. 315/316-94010 PG.11.

DIVISION ASSIGNED: REACTOR SAFETY  
RELATED FILE(S): N  
ACTION PLAN SUBMITTED: N  
ALLEGATION REVIEW BOARD: N  
OI STATUS: PENDING ARB  
KEYWORD: REC FW

ENTERED SYSTEM - 940802 CLOSED SYSTEM -

RECORD CHANGED - 940802

7/14  
02 - 4

*RWD 7/16/94*

MEMORANDUM FOR: Donald Funk, Region III Allegation Coordinator

FROM: James L. Belanger, Senior Physical Security Inspector

SUBJECT: POTENTIAL FALSIFICATION OF FIREWATCH TOURS AT D.C. COOK PLANT

During an inspection at the D.C. Cook plant during the week of May 9-13, 1994 I was present during a briefing of the resident inspector on May 12, 1994 by the licensee on an issue of potential wrongdoing involving falsification of firewatch tours. Specifically, the licensee, through a review of ten percent of the firewatch tours conducted over a three month period, identified five fire watch tours that apparently were falsified by one fire watch person. Technical Specifications were violated. These incidents occurred in December 1993. The licensee stated that the fire watch person involved did not work at the site, having not been retained by the new fire watch contractor that took over in January 1994. During the licensee's investigation of the incident, the subject denied falsifying the records. [redacted] is on the site's denied access list. This information is also in the index system. The incident was documented by the licensee in a Condition Report that was open at the time of my inspection. 7C

I advised the regional fire protection inspector (D. Schrum) of the meeting when I returned to the office on May 16, 1994. Mr. Schrum indicated that he was planning to do an inspection at D.C. Cook in the near future and would follow up on the condition report which I provided to him.

Mr. Schrum inspected D.C. Cook the week of June 7, 1994. He advised me by e-mail on June 20, 1994 that the licensee had identified a number of missed fire watch tours but there was no evidence that falsification was involved other than the December 1993 incident. (I was on annual leave for two weeks beginning the week of June 20, 1994 and opened my mail box on July 5, 1994.)

On July 5, 1994 Darrell Schrum, myself, and Wayne Shafer spoke by phone with Bob Defayette regarding this matter. Bob stated that I should document in a memo to you what information I had regarding this incident so that it could be forwarded to the appropriate division for action. This is the purpose of this memo.

*James L. Belanger*  
James L. Belanger  
Senior Physical Security Inspector  
*July 6, 1994*

ALLEGATION ACTION PLAN  
 ALLEGATION NO. RIII- 94-A-0118

Information in this record was deleted  
 in accordance with the Freedom of Information  
 Act, exemptions 7C  
 FOIA- 99-76

Licensee: D. C. Cook

Docket/License No: 50-315 50-316

Assigned Division: DRS

Attached Pertinent Documents: 1. Memo from Darrell Schrum dated 6/20/94.  
2. Memo from Don Funk dated 8/2/94.

I. Division Action

- A. Prepared by: H. A. Walker 8/16/94  
Technical Staff Date
- B. Reviewed by: W.D. Shaffer 8/16/94  
Section Chief Date
- C. Approved by: [Signature] 8/16/94  
Branch Chief Date

II. Allegation Review Board Action

Allegation Review Board Membership  
H. Walker T. Martin Gaskew  
Benson Funk Paulik  
Wright Sedayette  
 Approved As Is

Approved with Modifications as Documented in Plan.

Disapproved for Following Reasons:

Yes  No  OI Referral

*I question whether this issue was an allegation to the first place. Are we now to force all licensee identifier issues into the allegation system? JW RWD*

*OI will number and close out for low priority because person has been fired. Serial access and is no longer on site access list. [Redacted] name is on the "Index" list. 8/22/94*

Robert Sedayette  
 Allegation Review Board Chairman

Ltr BPs DRS to review closeout condition report before making decision on closing. RWD

Revised 10/01/91 7C 5/11/0

0/5



E4

Falsification of Fire Watch Logs

tech. specs. →  
adm. procedures →  
lic. cond.

A fire watch supervisor audited a fire watch tour to ensure that the tour was conducted in the required time period to meet Appendix R requirements. The supervisor noted that the fire watch did not appear in the reactor building basement for the fire watch tour. The supervisor conducted the fire watch tour for the area to ensure that the area was properly toured. The fire watch log completed by the responsible individual indicated that the tour of the reactor building basement was performed. The licensee took disciplinary action against the fire watch.

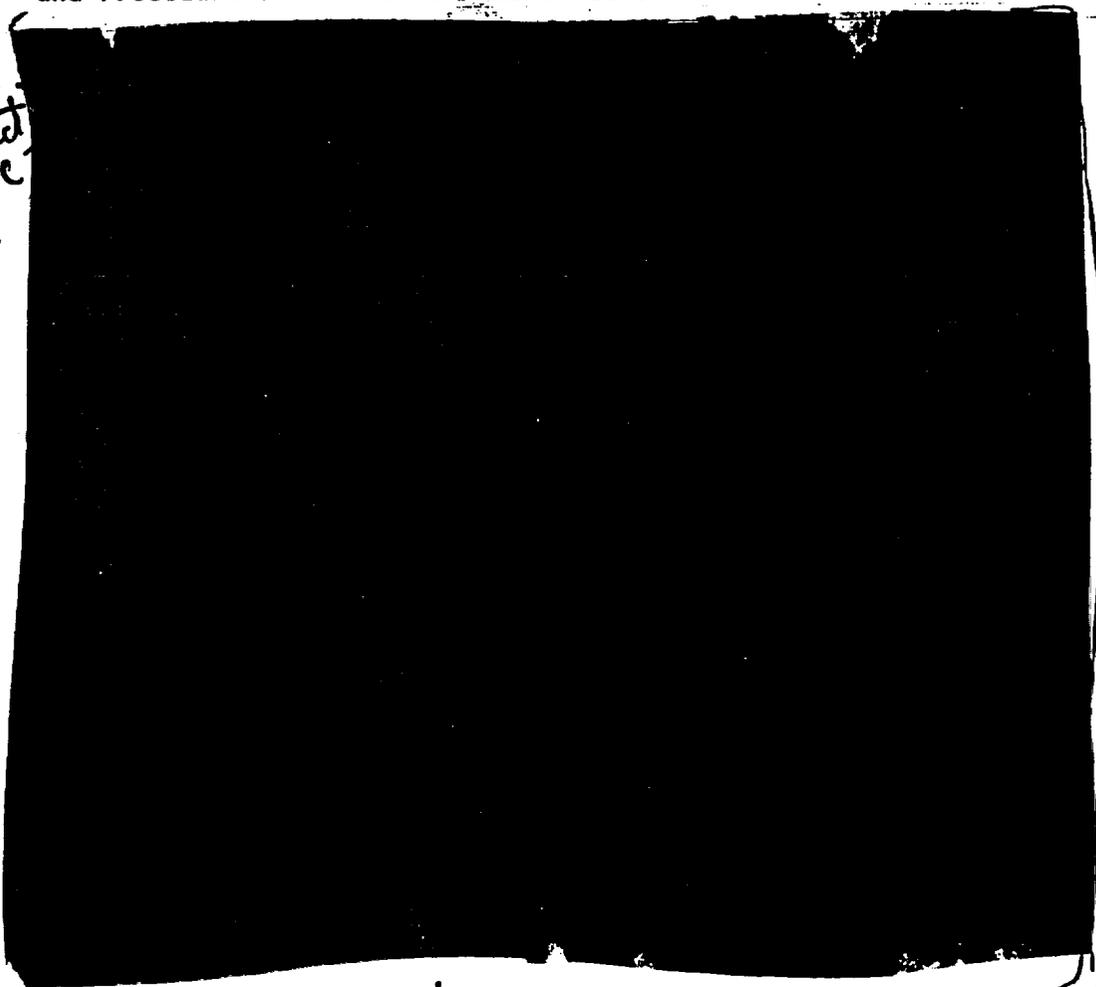
The licensee performed frequent supervisor monitoring of fire watch tours, and no other discrepancies of fire watch tours had been discovered. The decision to discipline the fire watch was

50/11

made by the contracted supervisor, and the licensee fire protection staff was kept informed.

The inspectors were concerned that no problem identification form was written, nor was licensee management informed of the incident until after mid-August when the inspectors raised questions about the incident. The licensee had not determined the extent of missed tours or whether the problem existed with other groups. The subsequent investigation determined that the fire watch was in the turbine building at the time of the incident, but the tour route conducted by the fire watch in the building could not be verified.

Failure to properly implement fire prevention rounds is a Violation of 10 CFR Part 50, Appendix B, Criterion V. However, this violation is not being cited because the criteria specified of 10 CFR 2, Appendix C, VII.B of the "General Statement of Policy and Procedure for NRC Enforcement Action" were met.



Since the sup.  
conducted the required  
tour how can this  
be a vio.?  
If a vio., which  
criteria was met  
(10 CFR 2 quote  
appears incorrect  
sect. V.G of app. C  
to 10 CFR 2 is  
per quote best met.

ES

10/15

ALLEGATION ACTION PLAN

ALLEGATION NO. RIII-94-A-0157

Licensee: Commonwealth Edison Company (QUAD-CITIES)  
 Docket Number: 50-254; 50-265  
 License Number: DPR-29; DPR-30  
 Assigned Division: N/A

Attached Pertinent Documents: Memo to Bob DeFayette thru C. Miller and P. Hiland; E-Mail to Bob DeFayette and D. Funk from Keith Walton dated September 13, 1994; and licensee memo to Tom Hall from E. Smith dated September 8, 1994.

I. Division Action:

A. Prepared by: David M. Chey 9-19-94  
 Technical Staff Date  
 B. Reviewed By: Pat Hiland 9-19-94  
 Section Chief Date

II. Allegation Review Board Action:

Allegation Review Board Membership

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

- Approved As Is
- Approved with Modifications as Documented in Plan
- Disapproved for Following Reasons: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Referred to OI  Yes  No

Information in this record was deleted in accordance with the Freedom of Information Act, exemptions 7C  
 FOIA- 99-76

Allegation Review Board Chairman

Date

5/12

**ALLEGATION ACTION PLAN**

Concerns and any peripheral issues associated with a concern should be documented on a separate page. Each concern and peripheral issue, if any, should be documented in the followup report as is stated in this plan. If there are several concerns in one area, one page can be used. Otherwise, a separate page should be used for each concern.

Concern No.            Peripheral Issues Associated with Concern No.     

Missed fire watch

**I. Action Evaluation: The following method of resolution is recommended:**

- A. Send to Licensee Requesting Response in 60 Days with RIII Followup\*
- B. Priority RIII Followup
- C. Followup During Routine Inspection Within 60 Days
- D. Followup with Assistance from OI
- E. No Action - Outside NRC's Charter (describe basis below)
- F. No Action - Without Merit (describe basis below)
- G. Refer to OI
- ..... H. Other (specify) No NRC action recommended. No fire watch was missed by the licensee since the fire watch supervisor made up the rounds that were allegedly missed by the fire watch inspector. Since there were discrepancies between the statements provided by the inspector and supervisor, the inspector is filing a formal grievance at this time.

\*If the proposal is to send to the licensee, the Action Plan should describe the general areas the licensee is expected to address.

**II. Inspector's Actions: The following areas at a minimum will be reviewed during the inspection into the above mentioned concern.**

- A. Objective: \_\_\_\_\_
- B. Methods:
  - 1. Persons to be contacted: \_\_\_\_\_
  - 2. Documents or activities to be reviewed: \_\_\_\_\_
  - 3. Time period to be covered: \_\_\_\_\_
  - 4. Locations or specific areas to visit: \_\_\_\_\_
  - 5. Other areas (specify): \_\_\_\_\_

Allegation No. RIII-93-A-

To: Bob DeFayette, Director, Enforcement & Investigation Office/NRC/R111  
Thru: Chris Miller, Senior Resident Inspector, OCNPS - Great Cities Nuclear Power Sta  
Thru: Pat Hiland, Section Chief, DRP/NRC/R111

Re: Allegation of Document Falsification

In mid-August, the inspectors received written communication from an unknown author inquiring if the licensee had written a Licensee Event Report (LER) for a missed fire watch in the Unit 1 reactor building basement. This communications included that an unnamed fire watch was dismissed for involvement in the event.

The inspectors contacted the licensee fire marshal about the event. The fire marshal stated that the fire watch was terminated in mid-July due to falsifying logs and that the fire watch tour was made by the supervisor so an LER was not required.

After prompting from the inspectors, the licensee documented this event on a PIF on August 22 and commenced an investigation. The inspectors presently are reviewing the licensees' and contractors' investigation.

*Robert DeFayette/EICS/R111*

From: Raymond K. Walton (RKW) DRP/R111  
To: RWD, DEF-Donald Funk/DRS/R111  
Date: Tuesday, September 13, 1994 5:07 pm  
Subject: Allegation of Document Falsification

Attached is a message dealing with an allegation received by the resident inspector staff at the Quad Cities station. The original note was unsigned and found in the residents mail box in mid-August. The residents pursued the issue as a resident office initiative and not as an allegation. We are providing this message to document our discovery and followup of the event.

The resident office forwarded information on this subject previously. Upon regional request, the residents will be sending a copy of the licensees' investigation for your review at a later date.

CC: *Chris Miller* CGM, PLH - Pat Hiland/DRP/R111  
Files: *Quad Cities Nuclear Power Station*  
P:\ALLG

To: Doris Chyu  
Fm: RIO @ GCNPS

September 8, 1994

Tom Hall  
Maintenance Supervisor  
Quad Cities Station

*Allegation Investigation  
by licensee of fire watch  
(Falsification of Logs Issue)*

**SUBJECT:** Investigation of Fire Watch Falsification of Records.

**RE:** FIF 94-2024

On July 20, 1994, the Site Manager of Burns Fire Prevention notified me that on July 19, 1994, a Burns Fire Prevention Shift Supervisor indicated a Burns Fire Prevention Inspector had not sufficiently completed their tour of the Unit One 1B Core Spray Room.

The Fire Prevention Inspectors are required to tour this room each hour as a compensatory measure and watch for the potential of fire. On July 19, 1994, the supervisor was performing a random post check of this inspector to verify that their tour was being completed properly. Although random post checks are typically performed each shift, this inspector had been described by other inspectors during that same shift as potentially not adequately performing the required duties.

I have reviewed the supervisors written documentation that states she was in attendance of the 1B Core Spray Room and that the inspector did not enter that room. The inspector however documented that she had performed the required fire watch in that room and the time documented for that fire watch conflicted with the time that the supervisor was said to be present.

The issue between the supervisors and inspectors conflicting statements is being handled through a formal grievance process at this time.

**IMMEDIATE ACTIONS:**

The individuals involved were immediately instructed to document their actions as to when and where they had performed their duties. The evaluation of the Unit One Torus area and the Unit 1B Core Spray Room by the Supervisor was sufficient for the required fire watch as the supervisors are trained beyond the level of a fire watch inspector.

The Security computer logs of the entry and exit times through the vital door into the Turbine Building for this shift were sought and reviewed. There were no discrepancies of entry or exit times from the Turbine Building by the inspector or supervisor.

These actions were completed on July 20, 1994.

*Post on  
7C*

**FURTHER ACTIONS:**

Further questions prompted me to review a history of entry and exit times for this inspector. The security computer vital door logs two weeks before this incident were reviewed and the inspector involved was only present for one of those weeks. The results of this review revealed no discrepancies of entry and exit times. An interview with the Burns Shift Supervisors that supervise this inspector was also conducted to determine if any post check revealed any problems during this investigation period. Again no discrepancies were noted. These actions were completed August 31, 1994.

Due to this event, Burns Fire Prevention Site Manager has instituted a program that periodically reviews the security door logs for the Fire Prevention Inspectors.

**COMPENSATORY MEASURES:**

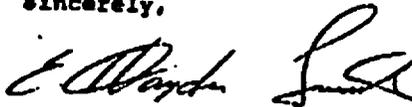
As stated above, the evaluation of the Unit One Torus area and the Unit 1B Core Spray Room by the Supervisor was sufficient for the required fire watch thereby insuring no violation of compensatory measures had occurred.

The supervisors are required to perform random checks within the station to verify that the inspectors are adequately performing their duties. These checks are an unannounced inspection of different areas so the inspectors may be viewed at any time. The checks are performed a minimum of once per shift and more frequently as time permits.

Due to the effectiveness of the random post checks, it is reasonable that the fire watches are being completed as required. My staff strongly promotes reporting of any problem that may affect the safety of the station as shown by the initial reports of a potential concern with this inspector.

If you should have any questions or concerns, please feel free to contact me at extension 2249.

Sincerely,



E. Hayden Smith  
Station Fire Marshal

c.c.

K. Sondgeroth  
R. Trimble

ALLEGATION ACTION PLAN  
ALLEGATION NO. RIII-96-A-0090

Licensee: D.C. Cook, Indiana Michigan Power Company

Docket/License No: 5C-315; 5-316

Assigned Division: Division of Reactor Safety

Attached Pertinent Documents: Copy of Condition Report #96-0778

I. Division Action

A. Prepared by: D. Schrum  
Darrell Schrum

6/18/96  
Date

B. Approved by: Ronald Gardner  
Ronald Gardner, Engineering  
Specialist 2 Branch

6/18/96  
Date

II. Allegation Review Board Membership:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

III. Remarks

Information in this record was deleted  
in accordance with the Freedom of Information  
Act, exemptions 7C  
FOIA- 99-76

Safety Significance:    HIGH            MEDIUM            LOW            NA

Approved As Is

Approved with Modifications as Documented in Plan.

Disapproved for Following Reasons:

Yes             No    OI (Priority: HIGH    NORMAL    LOW )

55/13

Allegation Review Board Chairman

Date

A. AGGREGATION/PERIPHERAL ISSUE ACTION PLAN

Concerns and any peripheral issues associated with a concern should be documented on a separate page. Each concern and peripheral issue, if any, should be documented in the followup report as is stated in this plan. If there are several concerns in one area, one page can be used. Otherwise, a separate page should be used for each concern.

Concern No. 1

1. Deliberately moving a bar code which was being used to verify fire watch tour completion and compliance with Tech Spec 3.7.10.
2. Deliberately and willfully obstructed a security investigation.

On May 11, 1996, the licensee identified that a bar code used for scanning during fire watch tours had been moved from the area required to be toured to the opposite side of a door which was another fire area. [REDACTED] originally lied about moving the bar code but later admitted that he had moved the bar code. 76

I. Action Evaluation: The following method of resolution is recommended (circle):

- A. Send to Licensee Requesting Response in Days with RIII Followup\*
- B. Priority RIII Followup
- C. Followup During Routine Inspection Within 60 Days
- >>>>>D. Followup with Assistance from OI
- E. No Action - Outside NRC's Charter (describe basis below)
- F. No Action - Without Merit (describe basis below)
- G. Refer to
- H. Other (specify)

\* If the proposal is to send to the licensee, the Action Plan should describe the general areas we expect the licensee to address.

II. Inspector's Actions: The following areas at a minimum will be reviewed during the inspection into the above mentioned concern and/or peripheral issue.

A. Objective: An inspection of the fire watch program to verify that the licensee reviewed the plant security data to see if other fire watches were missed. Inspector review of fire watch logs and plant security data to identify other examples of missed fire watches (wrong doing). Interview and accompany fire watches on their rounds to assess their understanding of D.C. Cook management expectations. Assess if new fire watches are being properly trained for their duties. Identify what actions the licensee has taken against [REDACTED] for wrong doing. Identify what additional licensee corrective actions were taken to ensure that other fire watches do not deliberately miss areas during their fire watch tours. 76

B. Methods

1. Persons to be contacted: Fire Protection Manager, Fire Watch Supervisors, and Fire Watches.
2. Documents and/or activities to be reviewed: Review plant security data and fire watch logs. Interview the fire protection staff and accompany fire watches on their rounds.

3. Time period to be covered: Several months of fire watch logs and security data should be reviewed.
4. Locations/specific areas to visit: Plant specific areas covered by fire watches and area where fire watch logs/security data are available for review.
5. Other areas (specify): None.

11/94 OAC

Allegation No. RIII-96-A-0090

Peripheral Issue No. . .

Are the licensee's corrective actions effective in preventing missed fire watches?

Two years ago D.C. Cook had significant problems with missed fire watches. Approximately 20 fire watches were fired during the year for performance issues which included deliberately missing areas during their fire watch tours.

I. Action Evaluation: The following method of resolution is recommended (circle):

- A. Send to Licensee Requesting Response in Days with RIII Followup\*
- B. Priority RIII Followup
- C. Followup During Routine Inspection Within 60 Days
- D. Followup with Assistance from OI
- E. No Action - Outside NRC's Charter (describe basis below)
- F. No Action - Without Merit (describe basis below)
- G. Refer to
- H. Other (specify)

\* If the proposal is to send to the licensee, the Action Plan should describe the general areas we expect the licensee to address.

II. Inspector's Actions: The following areas at a minimum will be reviewed during the inspection into the above mentioned concern and/or peripheral issue.

- A. Objective and methods the same as listed in Concern #1.

Peripheral Issue No. 4

Are there additional examples of wrong doing by fire watches?

I. Action Evaluation: The following method of resolution is recommended (circle):

- A. Send to Licensee Requesting Response in Days with RIII Followup\*
- B. Priority RIII Followup
- C. Followup During Routine Inspection Within 60 Days
- D. Followup with Assistance from OI
- E. No Action - Outside NRC's Charter (describe basis below)
- F. No Action - Without Merit (describe basis below)
- G. Refer to
- H. Other (specify)

\* If the proposal is to send to the licensee, the Action Plan should describe the general areas we expect the licensee to address.

II. Inspector's Actions: The following areas at a minimum will be reviewed during the inspection into the above mentioned concern and/or peripheral issue.

- A. Objective and methods the same as listed in Concern #1.

JO: JIM BELANGER

Give to Belanger?

YES

Condition Report Number 96-0778

Part A (Originator)  
 Reported By Larry Smead Department/Section Plant Protection

Report Date 5-13-96 Date/Time of Condition 5-11-96 1 1114

Unit Affected:  1  2  Both  N/A

Condition Identification and Description

Description of Condition: On 5-11-96, a Fire Tour of Unit 1 CRT was being conducted in accordance with T.S. 3.7.10. At 1114 hours, the tour officer identified the Bar Code which was placed on the inner side of Door 333 was missing. Subsequent investigation identified the Bar Code had been moved, and placed on the back side of the door closure between the closure and door on a small area which without close investigation could not have been seen. The Bar Code was originally located at eye level, center of the door. Security computer transactions identified [redacted] Operator [redacted] as being in the area. A phone call was made to the Control Room and [redacted] [redacted] stated he knew nothing about the missing Bar Code. After finding the Bar Code, a second phone call was made to the Control Room and [redacted] was spoken with. When [redacted] was told he had been identified as being in the CRT area, he stated he had the Bar Code. When asked why, he stated he had just moved it, and

Method of Discovery: Tour being performed in accordance with Tech Spec 3.7.10.

Immediate Action Taken: Call made to Fire Protection Supervisor to have Bar Code replaced. Search for original Bar Code and investigation initiated.

Outage Management Notified:  Yes  No

Originator's Supervisor Review: Larry Smead Name 5-13-96 Date

Supervisor's Comments: This event impacts on the credibility and trustworthiness of the individual involved as a nuclear plant worker. Further investigation should be performed to determine if continued unescorted access should be granted.

Determined Not Reportable

Reference Documents:

QA/NSDRC Audit/Surv. Number \_\_\_\_\_

NRC Inspection Report/Finding Number \_\_\_\_\_

Specification(s) Tech Spec 3.7.10

Procedure Number(s) PMI 2270

Drawing Number(s) \_\_\_\_\_

Design Change Number \_\_\_\_\_

JO Number \_\_\_\_\_

Purchase Order \_\_\_\_\_

Code/Standard 10 CFR 73.71, (1) (3)

Other (i.e., Previous PRs or CRs, etc.) \_\_\_\_\_

Equipment Involved:  Yes  No

Component FDB Identification Number: RG-07

Functional Name: CRP SEA1

BFB

# ALLEGATION ASSIGNMENT FORM

Chilling effect.

Allegation Number: RIV-95-A-0237

Licensee/Facility or Location: WATERFORD-3

Discussed at ARP meeting on: 12/11/95

Assigned to: DRP, DRS, DNMS, SAC Branch:

OI involvement? OI tracking number:

Allegation Summary: A fire watch was directed by a security shift supervisor to relocate a "Horse Watchman Key," while the firewatch was on patrol. According to the ~~alleged~~ relocation of the key was a violation of Procedure FP-001-D14, Section 6.1.5. The firewatch refused to relocate the key and the firewatch's badge was deactivated and he was sent home. Preliminary review of the referenced procedure indicated that the firewatch should not have been required to perform the task simultaneous with fire watch duties.

ARP instructions/guidance: .

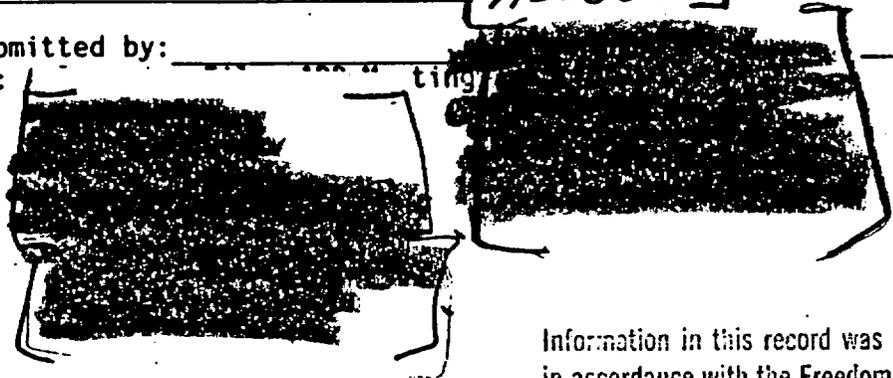
ARP Chairman: \_\_\_\_\_ Date: \_\_\_\_\_

~~Allegation~~ Resolution Plan (return to the SAC within 10 days of ARP meeting):

OI to interview ~~alleged~~ determine nature and circumstances surrounding access revocation

~~ALLEGED~~

Submitted by: \_\_\_\_\_  
cc: \_\_\_\_\_ ting



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FOIA- 99-76

5/7/14

Title: LIMERICK GENERATING STATION UNITS 1 AND 2:

FALSIFICATION OF FIRE PROTECTION SURVEILLANCE TEST DOCUMENTATION  
BY A PECO TECHNICAL ASSISTANT

Licensee: PECO Energy Company  
P.O. Box 7520  
Philadelphia, PA 19101

Case No.: 1-96-033

Report Date: February 19, 1997

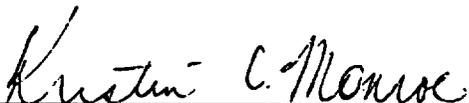
Docket Nos.: 50-352/353

Control Office: OI:RI

Status: CLOSED

Reported by:

Reviewed and Approved by:

  
\_\_\_\_\_  
Kristin L. Monroe, Special Agent  
Office of Investigations  
Field Office, Region I

  
\_\_\_\_\_  
Barry R. Letts, Director  
Office of Investigations  
Field Office, Region I

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EOIA- 99-76

**WARNING**

This Report of Investigation consists of pages 1 through 9,  
with exhibits 1 through 13. It has not been reviewed  
pursuant to Title 10 CFR Subsection 2.790(a) exemptions nor has  
any exempt material been deleted. Do not disseminate, place in  
the Public Document Room or discuss the contents of this report  
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## SYNOPSIS

This investigation was initiated by the U.S. Nuclear Regulatory Commission (NRC), Office of Investigations (OI), Region I (RI), on September 19, 1996, to determine the adequacy of a PECO Energy Company (PECO) internal investigation regarding an allegation that a technical assistant, Fire Protection Section, Limerick Generating Station (LGS), deliberately failed to properly perform a fire hose station visual inspection surveillance test (ST) and falsified the surveillance test document.

A joint investigation by the PECO Security Division and the LGS Quality Division substantiated that the technical assistant deliberately failed to properly perform the "ST-7-022-951-0 Fire Hose Station Visual Inspection" surveillance test and falsified the surveillance test documentation on July 29, 1996. In addition, the PECO internal investigation developed that the technical assistant also deliberately failed to properly perform other fire hose station visual inspection surveillance tests and falsified related surveillance test documentation on April 3, 1995, June 8, 1995, April 30, 1996, and May 29, 1996. The PECO investigation also developed an irregularity in an additional surveillance test conducted by the technical assistant. The technical assistant failed to enter a specific area of the LGS necessary to complete "ST-7-022-950-0, Fire Suppression Water System (FSWS) Spray and Sprinkler Visual Inspection," and for which he signed documentation indicating that the visual inspection had been satisfactorily performed on June 28, 1995. Based on OI's review of the PECO internal investigation, it is concluded that the technical assistant deliberately falsified selected surveillance test documentation.

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## DETAILS OF INVESTIGATION

### Applicable Regulations

- 10 CFR 50.5: Deliberate misconduct (1995 and 1996 Editions)
- 10 CFR 50.9: Completeness and accuracy of information (1995 and 1996 Editions)
- LGS TS 6.8: Procedures and Programs
- LGS TSs 4.7.6.5.a, 4.7.6.2.c.2, and 4.7.6.2.c.3 (effective until December 20, 1995)
- LGS TRMs 4.7.6.5.a, 4.7.6.2.c.2, and 4.7.6.2.c.3 (effective December 20, 1995)

### Purpose of Investigation

This investigation was initiated by the U.S. Nuclear Regulatory Commission (NRC), Office of Investigations (OI), Region I, on September 19, 1996, to determine the adequacy of a PECO Energy Company (PECO) internal investigation of an allegation that [REDACTED] Technical Assistant, Fire Protection Section, Limerick Generating Station (LGS), PECO, deliberately failed to properly perform a fire hose station visual inspection surveillance test (ST) and falsified the surveillance test documentation (Exhibits 1 and 2). 7C

### Background

On November 25, 1995, PECO received permission from the NRC to change the Fire Protection Technical License Condition and relocate the Fire Protection Technical Specification requirements to the Updated Final Safety Analysis Report. The change was in accordance with Generic Letter (GL) 88-12, "Removal of Fire Protection Requirements from Technical Specifications." As of December 20, 1995, the LGS Fire Protection Technical Specification requirements became part of the LGS Technical Requirements Manual (Exhibit 3).

On August 7, 1996, PECO management received an allegation that [REDACTED] was not in the LGS plant a sufficient amount of time to perform the surveillance inspections necessary for "ST-7-022-951-0, Fire Hose Station Visual Inspection," documentation dated July 29, 1996 (Exhibit 4, p. 1). 7C

On August 12, 1996, a PECO internal investigation was initiated at the request of LGS management related to the August 7, 1996, allegation (Exhibit 4, p. 1).

On August 12, 1996, [REDACTED] was suspended by PECO, and his unescorted access was suspended pending the results of the PECO Security investigation (Exhibit 4, p. 2). 7C

On September 11, 1996, [REDACTED] was terminated by PECO (Exhibit 1, Exhibit 4, p. 3, and Exhibit 8). 7C

AGENT'S NOTE: [REDACTED] was reinstated effective November 4, 1996. Although [REDACTED] was reinstated by the Peer Review Panel, his nuclear access status (XN) remained unchanged. [REDACTED] has been working at the [REDACTED] since November 11, 1996 (Exhibits 9 and 10).

7C

### Review of PECO Internal Investigation

[REDACTED] was interviewed by PECO Security on August 13, 1996, and provided a written statement. [REDACTED] admitted that he had not gone to all the listed locations on the fire hose station visual inspection surveillance test, but had annotated the inspection as completed on the surveillance test document on July 29, 1996. [REDACTED] told PECO Security that he had taken credit for previous observations, that he had made on previous dates, of the fire hose stations (Exhibit 4, pp. 2 and 3, and Exhibit 5).

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Further investigation disclosed irregularities in four previous fire hose station visual inspection surveillance tests conducted by [REDACTED] on April 3, 1995, June 8, 1995, April 30, 1996, and May 29, 1996. [REDACTED] was interviewed again on August 16, 1996, and provided a written statement. [REDACTED] admitted that he had not completed the four surveillance tests properly. [REDACTED] admitted to PECO Security that he had signed the surveillance test documentation as having performed the fire hose station visual inspection on those dates (Exhibit 4, pp. 2 and 3, and Exhibit 6).

7C

The PECO internal investigation also developed an irregularity in an additional surveillance test conducted by [REDACTED] failed to enter a specific area of the LGS necessary to complete "ST-7-022-950-0, Fire Suppression Water System (FSWS) Spray and Sprinkler Visual Inspection," for which he signed documentation indicating that he had satisfactorily performed the inspection on June 28, 1995. This matter was not pursued with another PECO interview of [REDACTED] as he had previously indicated that other surveillances tests he performed may not have been completed properly (Exhibit 4, pp. 2 and 3, and Exhibit 7).

7C

### Conclusion

The PECO internal investigation substantiated that [REDACTED] deliberately failed to properly perform a fire hose station visual inspection surveillance test, and falsified the surveillance test documentation on July 29, 1996. In addition, the PECO internal investigation developed that [REDACTED] deliberately failed to properly perform other fire hose station visual inspection surveillance tests and falsified the surveillance test documentation on April 3, 1995, June 8, 1995, April 30, 1996, and May 29, 1996. The PECO investigation also developed an irregularity in an additional surveillance test conducted by [REDACTED] failed to enter a specific area of the LGS necessary to complete "ST-7-022-950-0, Fire Suppression Water System (FSWS) Spray and Sprinkler Visual Inspection," for which he signed documentation indicating that he had satisfactorily performed the inspection on June 28, 1995. Based on OI's review of the PECO internal investigation, it is concluded that [REDACTED] deliberately falsified selected surveillance test documentation.

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SUPPLEMENTAL INFORMATION

The scope of the PECO internal investigation also identified other unrelated irregularities involving [REDACTED], LGS, and a contract employee ([REDACTED]), both in August 1995. OI did not independently review the circumstances involving the contract employee. 7C

On January 23, 1997, OI interviewed EPLER (Exhibit 11) and [REDACTED] LGS (Exhibit 12). [REDACTED] testimony to OI did not conflict with his testimony to PECO Security on August 20, 1996. [REDACTED] told OI that he had conducted the surveillance test in August 1995 with [REDACTED]. [REDACTED] also told OI that he had made a mistake, but he did not "blatantly not perform the test." [REDACTED] said that he did fail to immediately and properly document the surveillance test document. PECO security door access records (zone trace) for [REDACTED] and [REDACTED] corroborated that they were in the required areas for the surveillance test on August 19, 1995. On September 10, 1996, [REDACTED] received [REDACTED] from [REDACTED]. [REDACTED] as a result of the investigation into the performance of surveillance tests in the Fire Protection organization (Exhibit 13). 7C

On January 28, 1997, the facts of the case involving [REDACTED] were discussed with Ronald LEVINE, Chief, Government and Health Care Fraud Section, U.S. Attorney's Office, Eastern District of Pennsylvania. LEVINE declined review of the case in favor of NRC enforcement action, if appropriate. 7C

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LIST OF EXHIBITS

<u>Exhibit No.</u>	<u>Description</u>	
1	Investigation Status Record, dated September 19, 1996.	
2	Copy of Allegation Receipt Report, RI-96-A-XXXX, dated August 16, 1996.	
3	Copy of OI Conversation Record with NEFF, dated January 23, 1997, with attachments.	
4	Copy of a Memorandum to [REDACTED] from [REDACTED] dated September 30, 1996, Subject: "Security Investigation-Quality Concern 127 Allegation of Falsification of Fire Protection Section Surveillance Test, Limerick Generating Station."	7C
5	Copy of [REDACTED] Statement to PECO Security, dated August 13, 1996, with attachment.	7C
6	Copy of [REDACTED] Statement to PECO Security, dated August 16, 1996, with attachments.	7C
7	Copy of "ST-7-022-950-0, Rev. 4, Philadelphia Electric Company, Limerick Generating Station Surveillance Test, Fire Suppression Water System (FSWS) Spray And Sprinkler Visual Inspection," dated June 29, 1995.	
8	Copy of a Letter (Draft) to [REDACTED] from [REDACTED] dated September 10, 1996.	7C
9	Copy of a Letter to [REDACTED] from [REDACTED] dated November 6, 1996.	7C
10	OI Telephone Conversation Record with [REDACTED] dated February 1, 1997.	7C
11	Interview Report of [REDACTED] dated January 23, 1997, with attachments.	7C
12	Interview Report of [REDACTED] dated January 23, 1997, with attachment.	7C
13	Copy of a Memorandum to [REDACTED], from [REDACTED] dated September 10, 1996.	7C

Patent  
7C

EXHIBIT 4

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FOIA- 99-76

5/1/16

Location: Security, S9-1  
Date: September 30, 1996  
To: [REDACTED] 7C  
Nuclear Quality Assurance  
From: [REDACTED] 7C  
Subject: Security Investigation-Quality Concern 127  
Allegation of Falsification of Fire Protection Section  
Surveillance Test, Limerick Generating Station

On August 12, 1996 an investigation was initiated at the request of Limerick Generating Station (LGS) management related to a Quality Concern alleging an employee of the LGS Fire Protection Section may have failed to properly perform a Surveillance Test.

On August 7, 1996 an allegation was received by management from an individual indicating the employee was not in the LGS plant a sufficient amount of time to perform the inspections necessary for Surveillance Test ST-7-022-951-0, titled: Fire Hose Station Visual Inspection, dated July 29, 1996.

A subsequent joint investigation involving the Security Division and the LGS Quality Division revealed the allegation to be correct and identified and confirmed additional falsifications of Surveillance Tests by the individual. The scope of the investigation also identified other unrelated irregularities involving Fire Protection Surveillance Tests by a Fire Protection System manager and a contract employee.

A listing of the Surveillance Tests reviewed by the Quality Division and the specific areas of concern identified is attached.

The following reflects the specific information related to each individual identified through the course of the investigation:

69051

CASE NO. 1 - 96 - 033

EXHIBIT 4  
PAGE 1 OF 5 PAGE(S)

Technical Assistant, LGS

7C  
[REDACTED] was alleged to have failed to properly conduct Surveillance Test ST-7-022-951-0, titled: Fire Hose Station Visual Inspection, for which he signed indicating he satisfactorily performed on July 29, 1996. Specifically, [REDACTED] was believed to have not been in the LGS plant long enough to conduct the Surveillance Test.

A preliminary investigation by Site Management determined [REDACTED] had not entered the certain areas of the LGS Plant on July 29, 1996 necessary to complete the Surveillance Test as required.

[REDACTED] was interviewed on August 13, 1996 and provided a written statement admitting he had annotated by signing his initials on the Surveillance Test in question, affirming on July 29, 1996 he visually observed the Fire Stations at all the LGS Plant locations as required by the Surveillance Test. During the course of the interview, [REDACTED] admitted to not going to all the listed locations on the Surveillance Test on that date. [REDACTED] provided information he annotated the inspections as completed on July 29, 1996, but that he had taken credit for previous observations he made on previous dates of the fire hose stations.

Management was advised of the interview results and on August 13, 1996, [REDACTED] was suspended from employment and his unescorted access was suspended pending the results of the investigation.

Further investigation revealed irregularities in four previous Surveillance Tests conducted by [REDACTED] failed to enter specific areas of the LGS Plant necessary to complete ST-7-022-951-0, titled: Fire Hose Station Visual Inspection, for which he signed, indicating he satisfactorily performed on April 3, 1995, June 8, 1995, April 30, 1996 and May 29, 1996.

[REDACTED] was again interviewed on August 16, 1996 and provided a written statement admitting to not completing the four Surveillance Tests properly in that he was not in the areas required to observe the fire hose stations on the dates in question. [REDACTED] admitted to signing the Surveillance Tests as performing them on the dates in question.

[REDACTED] in the interview of August 16, 1996, provided a written statement regarding concerns he noted in the Fire Protection Group which he had surfaced previously to his coworkers, manager and director. As part of the investigation, the issues were reviewed and investigated by the Quality Division. Attached are the results of the Quality Division investigation. 7C

Further investigation revealed an irregularity in an additional Surveillance Test conducted by [REDACTED] failed to enter a specific area of the LGS Plant necessary to complete ST-7-022-950-0, titled: Fire Suppression Water System (FSWS) Spray and Sprinkler Visual Inspection, for which he signed indicating he satisfactorily performed on June 28, 1995. This matter was not pursued with another interview of [REDACTED] as he had previously indicated other Surveillance Tests he performed may not have been completed properly. 7C

On September 11, 1996 management terminated [REDACTED] employment. 7C

[REDACTED]

The investigation revealed an irregularity in the portion of an Surveillance Test conducted by [REDACTED] failed to enter specific areas of the LGS Plant necessary to complete ST-7-022-952-0, titled: Fire Hose Station Refuel Inspection, dated: 8/23/95. The Surveillance Test reflects a signature by [REDACTED] indicating permission to start the test occurred on August 22, 1995 at 0930 hours. [REDACTED] again signed the Surveillance Test indicating he completed satisfactorily and performed on August 23, 1995 the portions of the Surveillance Test he initialed. Records indicate [REDACTED] was not in the required areas to perform the Surveillance Test on either of those dates. 7C

[REDACTED] was interviewed on August 20, 1996 and provided a written statement admitting to not being in the areas necessary to perform the requirements of the Surveillance Test on the dates he annotated on the Surveillance Test. [REDACTED] offered two possible explanations for why he signed and dated the Surveillance Test as: he took credit for the inspections done that date by a coworker; or, he took credit for the fire hoses being recently replaced but did not visually inspect them on the dates he annotated on the Surveillance Test. 7C

[REDACTED] Management was advised of the interview results and suspended unescorted access pending completion of the investigation. 7C

Further investigation determined the coworker named by [REDACTED] as having actually done the inspections had, in fact, not done the inspections. Also, the hose replacement he indicated he could have taken credit for occurred after, not before, the Surveillance Test was performed and included no hoses in the areas in question. 7C

[REDACTED] contacted his management on August 21, 1996 and related he performed the Surveillance Test on a previous date, approximately one week earlier, but had annotated the wrong date on the Surveillance Test. 7C

An investigation of the records indicates [REDACTED] was in the necessary areas of the LGS Plant to perform the Surveillance Test properly on August 19, 1995. 7C

Management reinstated [REDACTED] unescorted access on September 4, 1996 pending a final determination. 7C

[REDACTED]  
Bechtel Employee,  
[REDACTED] LGS 7C

The investigation revealed an irregularity in the portion of an Surveillance Test conducted by [REDACTED] was found not to have been in an area of the LGS Plant a sufficient amount of time necessary to complete a portion of ST-7-022-952-0, titled: Fire Hose Station Refuel Inspection, for which [REDACTED] signed indicating he satisfactorily performed on August 23, 1995. 7C

[REDACTED] was interviewed on August 21, 1996 and provided a statement he does not recall the events of August 23, 1995, but believes he either did the inspection but rushed through it; was called away during the inspection to another matter; or took credit for someone else who may have told him they did the inspection. 7C

Management was advised of the interview results and suspended unescorted access on August 21, 1996 pending completion of the investigation.

The investigation of records indicated [REDACTED] was in the area of the questionable test for no longer than one minute and fifty-nine seconds. A functional test performed as part of the investigation concluded a minimum of three minutes and eleven seconds was necessary to perform the test, and one minute and forty-five seconds to travel between the doors used as entrance and exit by [REDACTED] on the date in question. Further investigation showed [REDACTED] was not assisted by anyone on the date in question. 7C

Management reinstated [REDACTED] unescorted access on September 4, 1996 pending a final determination by his employer. 7C

[REDACTED]

7C

lc

Attachments

cc: J. W. Durham  
W. G. MacFarland, IV

Exhibit  
7C

# EXHIBIT 5

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5/5/17

AUGUST 13, 1996

I, [REDACTED], make the following voluntary statement to [REDACTED] and [REDACTED], who have identified themselves to me as investigators of the Claims-Security Division, PECO Energy Company.

I was born on [REDACTED] in [REDACTED] and currently reside with my [REDACTED] at [REDACTED]. I was employed by PECO Energy (or [REDACTED]) on 8/86 and currently work as TECHNICAL ASSISTANT at LIMERICK GENERATING STATION. My payroll number is [REDACTED].

ON JULY 29, 1996, I WAS ASSIGNED THE RESPONSIBILITY TO PERFORM SURVEILLANCE TEST; ST-7-022-951-0, "FIRE HOSE STATION VISUAL INSPECTION" AS PART OF MY WORK RESPONSIBILITIES AS A TECHNICAL ASSISTANT AT LIMERICK GENERATING STATION. THE SURVEILLANCE TEST REQUIRES I PERFORM A VISUAL INSPECTION OF ALL THE FIRE HOSE STATIONS LISTED ON THE SURVEILLANCE TEST.

ON JULY 29, 1996, I ENTERED THE PROTECTED AREA AT LIMERICK GENERATING STATION AT 11:00AM TO PERFORM THE SURVEILLANCE TEST. I TOOK A COPY OF THE SURVEILLANCE TEST WITH ME TO PERFORM THE TEST. I WENT TO VARIOUS LOCATIONS WITHIN THE PLANT AND OBSERVED SOME FIRE HOSE STATIONS.

I DID NOT INITIAL THE AREAS I INSPECTED AT THIS TIME.

7C

P. 1

ON THE SURVEILLANCE TEST. I EXITED THE PROTECTED AREA AT 12:02 PM ON DAY 29, 1996. I CARETAK THAT DAY COMPLETED THE SURVEILLANCE TEST DOCUMENT AT MY BEST AND MAINTAINED ALL OF THE AREAS INDICATING I VISUALLY INSPECTED THE FIRE HOSE STATIONS AT EACH OF THOSE LOCATIONS AS SHOWN IN THE SURVEILLANCE TEST.

ON THIS DATE I HAVE BEEN ADVISED OF THE CARD READER ERRORS AND EXITS I HAVE AT THE LINDA C. GENTRONE STATION ON DAY 29, 1996. I AGREE THAT I DID NOT GO TO EACH LOCATION AND VISUALLY INSPECT THE FIRE HOSE STATIONS AS REQUIRED BY THE SURVEILLANCE TEST I COMPLETED ON DAY 29, 1996. ST-7-022-951-0. IT IS CLEAR TO ME BASED ON THE INFORMATION THAT I DID NOT ~~inspect~~ <sup>inspect</sup> THE FIRE HOSE STATIONS BY UNIT 1 REAR AREA ENCLOSURE. IT IS ALSO TRUE I DID NOT ~~inspect~~ <sup>inspect</sup> THE FIRE HOSE STATIONS ON 180 ELEVATION, 200 ELEVATION, 332 ELEVATION ~~and~~ 254 ELEVATION <sup>ON THE</sup> ~~ENCLOSURE~~ <sup>ENCLOSURE</sup> THE ~~ENCLOSURE~~ <sup>ENCLOSURE</sup> WHICH I MAINTAINED AS SHOWN OBSERVED ON DAY 29, 1996 IN ST-7-022-951-0.

~~I~~ I INTENDED TO CONTEST THE ST. PROCEED AND DID IT ON RECOLLECTION OF WHAT I RECALLED IN THOSE AREAS FROM REAR'S EXPERIENCE, WHICH OCCURS THIS TEST AND MY PRESENCE IN THE AREA.

I have read the above Statement PAGE 4 OF 15 PAGE(S) CONSISTING OF

this and one other page and the facts contain here in are true. 8/13/96 7 C

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WITNESSES:

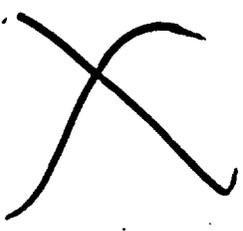


Witness/Coworker 8/13/96

SECURITY 8-13-96

INSTITUTE, 8/13/96

1 R0696762



PECO ENERGY COMPANY  
LIMERICK GENERATING STATION  
SURVEILLANCE TEST

W/O #R \_\_\_\_\_  
DATE/TIME 7-27-96 / 1200  
ACTOR: JY \_\_\_\_\_ JCF Y N  
RESULTS 5  
DATE VERIFIED 7/29/96 BY \_\_\_\_\_

ST-7-022-951-0 FIRE HOSE STATION VISUAL INSPECTION

Test Freq.: Monthly -OR- Initiating Events: 1. Reason \_\_\_\_\_  
Tech. Spec.: 4.7.6.5..a 2. A/R No. \_\_\_\_\_

TEST RESULTS:

A. All Asterisked(\*) Steps Completed SATISFACTORILY  
Performed By: \_\_\_\_\_ (Sign/Date) [Redacted] 7/27/96  
Reviewed By: \_\_\_\_\_ (Sign/Date) [Redacted] 7/29/96  
(IRM Mgr. or Designee)

B. One or More Asterisked(\*) Steps Test Results UNSATISFACTORY.  
Performed By: \_\_\_\_\_ (Sign/Date) \_\_\_\_\_  
Informed of Test Results (CO or RO) \_\_\_\_\_ (Sign/Date) \_\_\_\_\_  
(Time) \_\_\_\_\_  
Shift Supervision: \_\_\_\_\_ (Sign/Date) \_\_\_\_\_  
Corrective Action: \_\_\_\_\_ A/R No.: \_\_\_\_\_  
Initiated By: \_\_\_\_\_ (Sign/Date) \_\_\_\_\_

IMMEDIATELY NOTIFY SENIOR PLANT STAFF MEMBER

Person Notified: \_\_\_\_\_ (Name) \_\_\_\_\_  
Date/Time Notified: \_\_\_\_\_ (Date/Time) \_\_\_\_\_  
Notified By: \_\_\_\_\_ (Sign) \_\_\_\_\_

ADDITIONAL ACTION/TEST COMMENTS:

If any entry is made in Additional Action/Test Comments section, person making initial entry sign here.

(Sign/Date) \_\_\_\_\_

1.0 PURPOSE

To verify operability of accessible fire hose stations by visual inspection to assure all required equipment is present.

2.0 REFERENCES

- 2.1 N.F.P.A. 1962: Standard for the Care, Use and Maintenance of Fire Hose Including Connections and Nozzles.
- 2.2 LGS Fire Protection evaluation Report
- 2.3 M-22, P&ID - Fire Protection

3.0 TEST EQUIPMENT

None

4.0 PRECAUTIONS & LIMITATIONS

- 4.1 IF a procedural step cannot be completed OR any other difficulty is encountered during this test, THEN make a comment in the Additional Action/Test Comments section.
- 4.2 IF a step denoted as a Tech. Spec. Requirement marked with an asterisk (\*) cannot be successfully completed, THEN notify Shift Supervision immediately.
- 4.3 Signoff step marked SO in left-hand margin of body of procedure require a signoff on Table 1(2,3).

5.0 PREREQUISITES

- 5.1 None.

6.0 PROCEDURE

NOTE: It is the responsibility of the person or persons performing this test to ensure all blanks are correctly and completely filled in.

6.1 FIRE HOSE STATION VISUAL INSPECTION

SO 6.1.1 Verify designated hose station is equipped with fire hose AND nozzle.

a. If a hose station is inaccessible because of ALARA concerns, mark station A.C. A.C. does not fail this test.

b. Verify all station components present.

6.1.2 Replace protective hose reel cover (if applicable).

7.0 RETURN TO NORMAL

7.1 None.

8.0 ACCEPTANCE CRITERIA

8.1 All accessible hose stations on Tables 1(2,3) are completed satisfactorily.

NOTE: At test completion, ensure cover sheet is correctly and completely filled in.

NOTE: If any entry is made in this section, sign/date cover sheet under Additional Action/Test Comments.

ADDITIONAL ACTION/TEST COMMENTS: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

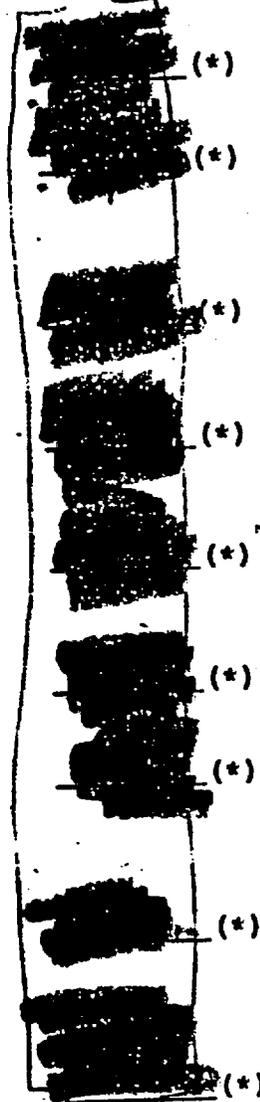
FIRE HOSE STATION VISUAL INSPECTION

TABLE 1 - COMMON

NOTE: Extra hose placed in a box listed after any given hose station on tables 1, 2, or 3 is considered part of the preceding hose station.

<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Control Enclosure:</u>				
Stairwell NW Corner	<u>704-A8-350</u>	<u>1HR-141</u>	<u>350</u> 5	(*)
Stairwell, Outside SGTS Rm.	<u>625-A8-332</u>	<u>1HR-140</u>	<u>332</u> 4	(*)
Box (Extra Hose) Near Hose Reel 1HR-140 (1) 100' Section	<u>625-A8-332</u>		<u>332</u> 4	(*)
Stairwell Outside Fan Room	<u>619-A8-304</u>	<u>1HR-103</u>	<u>304</u> 1	(*)
Stairwell, Outside Aux. Equip. Rm.	<u>519-A8-289</u>	<u>1HR-130</u>	<u>289</u> 7	(*)
Stairwell, Outside Cable Spreading Room	<u>402-A8-254</u>	<u>1HR-250</u>	<u>254</u> 9	(*)
Unit 2 Static Inverter Rm.	<u>453-A8-254</u>	<u>2HR-250</u>	<u>254</u> 8	(*)
W. Side Wall Outside 4Kv Switchgear & Battery Rm. 434	<u>447-T3-239</u>	<u>1HR-251</u>	<u>239</u> 13	(*)
Box (Extra Hose) Near Hose Reel 1HR-251 (1) 100' Section	<u>447-T3-239</u>		<u>239</u> 13	(*)

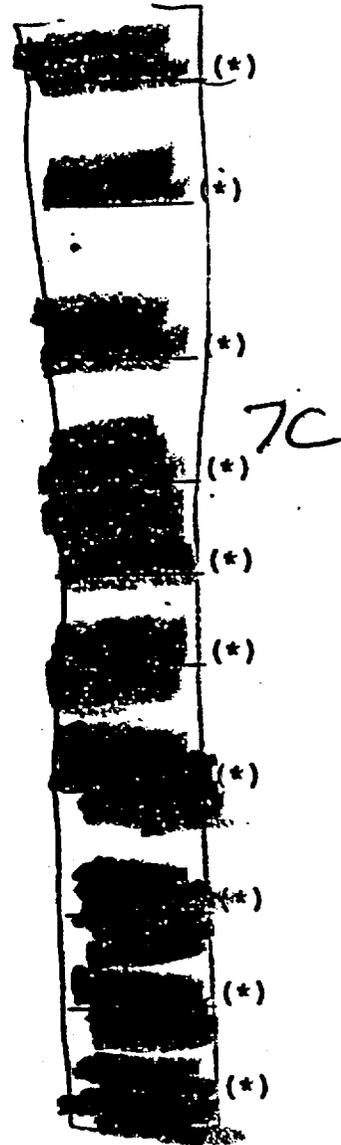
7C



FIRE HOSE STATION VISUAL INSPECTION

TABLE 1 - COMMON

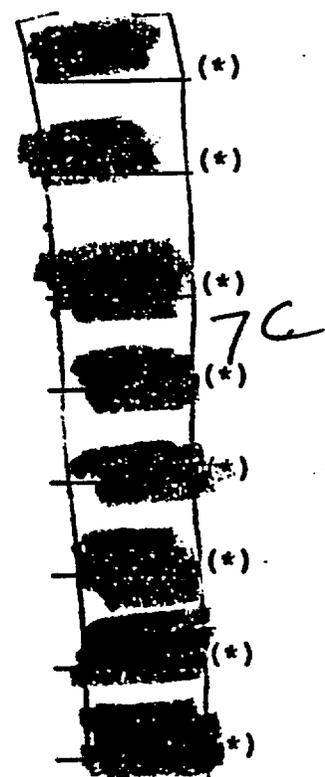
<u>LOCATION</u>	<u>Room/Area/E1.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Control Enclosure:</u>				
E. Side Wall Outside 4 Kv Switchgear & Battery Rm. 454	<u>465-T3-239</u>	<u>2HR-251</u>	<u>239</u> 28	[REDACTED] (*)
Corridor 448 SW Side of 4Kv Swgr & Battery Rms	<u>448-T7-239</u>	<u>1HR-124</u>	<u>239</u> 18	[REDACTED] (*)
Box (Extra Hose) Near Hose Reel 1HR-124 (1) 100' Section	<u>448-T7-239</u>		<u>239</u> 18	[REDACTED] (*)
Corridor 466 SE Side of 4Kv Swgr & Battery Rms	<u>466-T9-239</u>	<u>2HR-122</u>	<u>239</u> 26	[REDACTED] (*)
Outside 13Kv Swgr Room	<u>338-T7-217</u>	<u>1HR-116</u>	<u>217</u> 8	[REDACTED] (*)
Outside 13 Kv Swgr Room	<u>346-T9-217</u>	<u>2HR-116</u>	<u>217</u> 53	[REDACTED] (*)
Corridor 265, wall W. Side of 258A Control Enclosure	<u>265-T7-200</u>	<u>1HR-120</u>	<u>200</u> 2	[REDACTED] (*)
Corridor 277, wall E. Side of 263A Control Enclosure	<u>277-T9-200</u>	<u>2HR-120</u>	<u>200</u> 14	[REDACTED] (*)
Wall, Corridor 164	<u>164-A8-180</u>	<u>1HR-121</u>	<u>180</u> 1	[REDACTED] (*)
Wall, Corridor 166	<u>166-A8-180</u>	<u>2HR-121</u>	<u>180</u> 2	[REDACTED] (*)



FIRE HOSE STATION VISUAL INSPECTION

TABLE 1 - COMMON

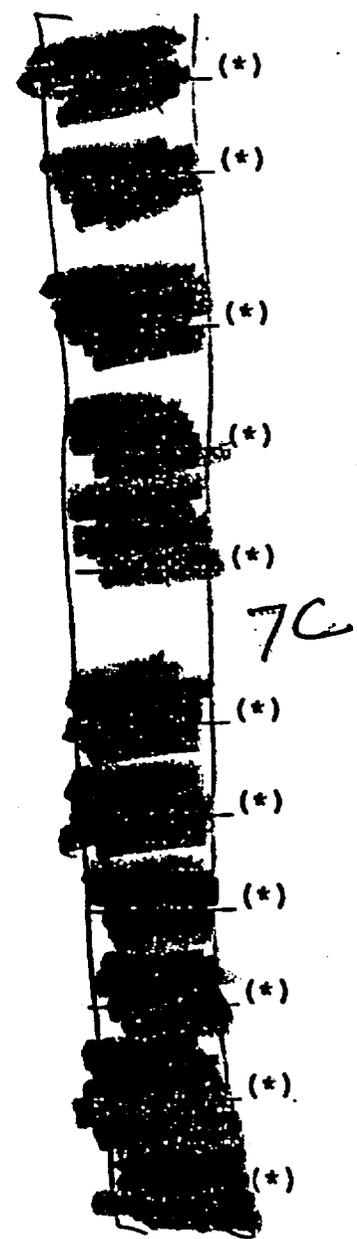
<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Reactor Enclosure:</u>				
NW Corner Refuel Floor	<u>700-R11-352</u>	<u>1HR-202</u>	<u>352</u> 4	[REDACTED] (*)
SW Corner Refuel Floor	<u>700-R15-352</u>	<u>1HR-201</u>	<u>352</u> 5	[REDACTED] (*)
South Side of Laydown Area	<u>700-R16-352</u>	<u>1HR-204</u>	<u>352</u> 8	[REDACTED] (*)
South Side of Laydown Area	<u>700-R17-352</u>	<u>2HR-204</u>	<u>352</u> 9	[REDACTED] (*)
SE Corner Refuel Floor	<u>700-R18-352</u>	<u>2HR-201</u>	<u>352</u> 12	[REDACTED] (*)
NE Corner Refuel Floor	<u>700-R14-352</u>	<u>2HR-202</u>	<u>352</u> 13	[REDACTED] (*)
North Side Spent Fuel Pool	<u>700-R13-352</u>	<u>2HR-203</u>	<u>352</u> 18	[REDACTED] (*)
North Side Spent Fuel Pool	<u>700-R12-352</u>	<u>1HR-203</u>	<u>352</u> 19	[REDACTED] (*)



FIRE HOSE STATION VISUAL INSPECTION

TABLE 2 - UNIT 1

<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Reactor Enclosure:</u>				
SW Corner	<u>613-R15-331</u>	<u>1HR-205</u>	<u>331</u> 1	[REDACTED] (*)
RERS Fan Area SW Corner	<u>605-R15-313</u>	<u>1HR-207</u>	<u>313</u> 3	[REDACTED] (*)
Box (Extra Hose) Near Hose Reel 1HR-207 (1) 100' Section	<u>605-R15-313</u>		<u>313</u> 3	[REDACTED] (*)
Laydown Area 601 NW Corner By Elevator	<u>601-R11-313</u>	<u>1HR-208</u>	<u>313</u> 2	[REDACTED] (*)
SE Corner Near Refuel floor Exhaust Fan	<u>605-R16-313</u>	<u>1HR-209</u>	<u>313</u> 7	[REDACTED] (*)
Box (Extra Hose) Near Hose Reel 1HR-209 (1) 100' Section	<u>605-R16-313</u>		<u>313</u> 7	[REDACTED] (*)
NE Corner Near D-124 Load Center	<u>602-R12-313</u>	<u>1HR-210</u>	<u>313</u> 9	[REDACTED] (*)
Corridor 506 NW Corner	<u>506-R11-283</u>	<u>1HR-216</u>	<u>283</u> 2	[REDACTED] (*)
Corridor 506 West Wall	<u>506-R15-283</u>	<u>1HR-215</u>	<u>283</u> 3	[REDACTED] (*)
SE Corner Near Hatchway	<u>500-R16-283</u>	<u>1HR-217</u>	<u>283</u> 5	[REDACTED] (*)
NE Corner	<u>506-R12-283</u>	<u>1HR-218</u>	<u>283</u> 8	[REDACTED] (*)

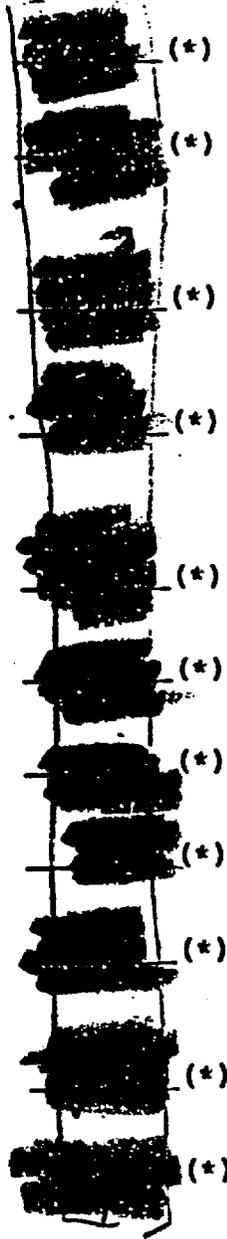


FIRE HOSE STATION VISUAL INSPECTION

TABLE 2 - UNIT 1

<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Reactor Enclosure:</u>				
West Wall Near CRD Repair Area	<u>402A-R16-253</u>	<u>1HR-223</u>	<u>253</u> 4	(*)
NW Corner Next To Elevator	<u>402-R11-253</u>	<u>1HR-224</u>	<u>253</u> 2	(*)
Box (Extra Hose) Near Hose Reel 1HR-224 (1) 100' Section	<u>402-R11-253</u>		<u>253</u> 2	(*)
SE Corner Near Drywell Personnel Lock	<u>402-R16-253</u>	<u>1HR-225</u>	<u>253</u> 6	(*)
Box (Extra Hose) Near Hose Reel 1HR-225 (1) 100' Section	<u>402-R16-253</u>		<u>253</u> 6	(*)
E. Wall Near Tip Machines	<u>402-R12-253</u>	<u>1HR-226</u>	<u>253</u> 7	(*)
W. Wall Near HPCI Equip. Hatch	<u>304-R15-217</u>	<u>1HR-232</u>	<u>217</u> 30	(*)
NW Corner Next To Elevator	<u>304-R11-217</u>	<u>1HR-233</u>	<u>217</u> 29	(*)
E. Wall Near Equip. Airlock	<u>304-R16-217</u>	<u>1HR-234</u>	<u>217</u> 33	(*)
NE Corner Near MCC D124-R-G at Stairwell	<u>304-R12-217</u>	<u>1HR-235</u>	<u>217</u> 34	(*)
W. Wall Near MCC D134-R-H	<u>200-R15-201</u>	<u>1HR-240</u>	<u>201</u> 3	(*)

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FIRE HOSE STATION VISUAL INSPECTION

TABLE 2 - UNIT 1

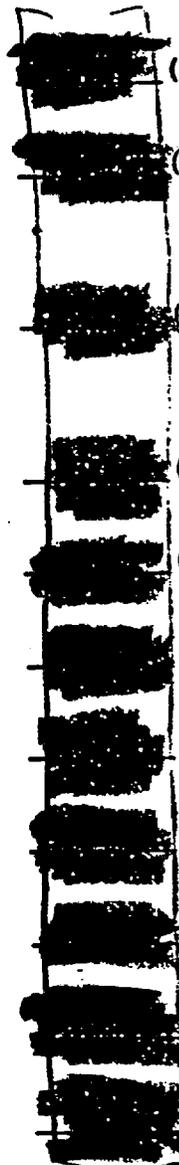
<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Reactor Enclosure:</u>				
Box (Extra Hose) Near Hose Reel 1HR-240 (1) 100' Section	<u>200-R15-201</u>		<u>201</u> 5	[REDACTED] (*)
NW Corner Next To Elevator	<u>200-R11-201</u>	<u>1HR-241</u>	<u>201</u> 2	[REDACTED] (*)
E. Wall Near RECW Heat Exchanger	<u>207-R16-201</u>	<u>1HR-242</u>	<u>201</u> 7	[REDACTED] (*)
NE Corner Near RECW Pumps at Stairwell	<u>207-R12-201</u>	<u>1HR-243</u>	<u>201</u> 8	[REDACTED] (*)
SW Corner Bottom of Stairwell	<u>103-R15-177</u>	<u>1HR-252</u>	<u>177</u> 4	[REDACTED] (*)
NW Corner By Elevator	<u>111-R11-177</u>	<u>1HR-253</u>	<u>177</u> 2	[REDACTED] (*)
NE Corner At Stairwell	<u>115-R12-177</u>	<u>1HR-142</u>	<u>177</u> 6	[REDACTED] (*)

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FIRE HOSE STATION VISUAL INSPECTION

TABLE 3 - UNIT 2

<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Reactor Enclosure:</u>				
SE Corner At Stairwell	<u>652-R18-331</u>	<u>2HR-205</u>	<u>313</u> 6	[REDACTED] (*)
RERS Fan Area SE Corner	<u>641-R18-313</u>	<u>2HR-207</u>	<u>313</u> 16	[REDACTED] (*)
Box (Extra Hose) Near Hose Reel 2HR-207 (1) 100' Section	<u>641-R18-313</u>		<u>313</u> 16	[REDACTED] (*)
SW Corner Near Refuel Floor Exhaust Fan Duct	<u>641-R17-313</u>	<u>2HR-209</u>	<u>313</u> 12	[REDACTED] (*)
Laydown Area NE Corner	<u>638-R14-313</u>	<u>2HR-208</u>	<u>313</u> 17	[REDACTED] (*)
NW Corner Near Load Center	<u>638-R13-313</u>	<u>2HR-210</u>	<u>313</u> 10	[REDACTED] (*)
Corridor 580 NE Corner	<u>580-R14-283</u>	<u>2HR-216</u>	<u>283</u> 17	[REDACTED] (*)
Corridor 580 SE Corner	<u>580-R18-283</u>	<u>2HR-215</u>	<u>283</u> 16	[REDACTED] (*)
SLC Pump Area SW Corner	<u>574-R17-283</u>	<u>2HR-217</u>	<u>283</u> 14	[REDACTED] (*)
NW Corner	<u>580-R13-283</u>	<u>2HR-218</u>	<u>283</u> 11	[REDACTED] (*)
SE Corner Near CRD Maint. Room	<u>475-R18-253</u>	<u>2HR-223</u>	<u>253</u> 13	[REDACTED] (*)



FIRE HOSE STATION VISUAL INSPECTION

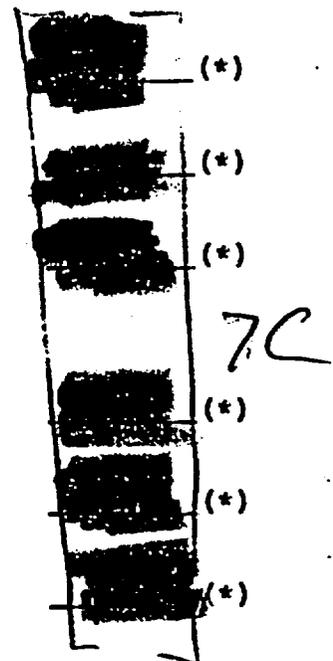
TABLE 3 - UNIT 2

<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Reactor Enclosure:</u>				
Box (Extra Hose) Near Hose Reel 2HR-223 (1) 100' Section	<u>475-R18-253</u>		<u>253</u> 13	[REDACTED] (*)
NE Corner Near Stair No. 6	<u>475-R14-253</u>	<u>2HR-224</u>	<u>253</u> 15	[REDACTED] (*)
W. Wall Near Unit 1/Unit 2 Airlock	<u>475-R17-253</u>	<u>2HR-225</u>	<u>253</u> 10	[REDACTED] (*)
W. Wall Near Stair No. 2	<u>475-R13-253</u>	<u>2HR-226</u>	<u>253</u> 9	[REDACTED] (*)
Box (Extra Hose) Near Hose Reel 2HR-226 (1) 100' Section	<u>475-R13-253</u>		<u>253</u> 9	[REDACTED] (*)
NE Corner Next To Elevator	<u>370-R14-217</u>	<u>2HR-233</u>	<u>217</u> 44	[REDACTED] (*)
SE Corner Near RCIC Equip. Hatch	<u>370-R18-217</u>	<u>2HR-232</u>	<u>217</u> 43	[REDACTED] (*)
W. Wall Near Airlock 366	<u>370-R17-217</u>	<u>2HR-234</u>	<u>217</u> 40	[REDACTED] (*)
NE Corner Near Stair No. 2	<u>370-R13-217</u>	<u>2HR-235</u>	<u>217</u> 39	[REDACTED] (*)
SE Corner near Stair No. 5	<u>279-R18-201</u>	<u>2HR-240</u>	<u>201</u> 14	[REDACTED] (*)
Box (Extra Hose) Near Hose Reel 2HR-240 (1) 100' Section	<u>279-R18-201</u>		<u>201</u> 12	[REDACTED] (*)

FIRE HOSE STATION VISUAL INSPECTION

TABLE 3 - UNIT 2

<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Reactor Enclosure:</u>				
NE Corner Near Stair No. 6	<u>279-R14-201</u>	<u>2HR-241</u>	<u>201</u> 15	[REDACTED] (*)
W. Wall Near RECW Hatch	<u>284-R17-201</u>	<u>2HR-242</u>	<u>201</u> 10	[REDACTED] (*)
NW Corner Near RECW Pumps By Stairwell	<u>284-R13-201</u>	<u>2HR-243</u>	<u>201</u> 9	[REDACTED] (*)
SE Corner Bottom of Stairwell	<u>178-R18-177</u>	<u>2HR-252</u>	<u>177</u> 11	[REDACTED] (*)
NE Corner By Elevator	<u>186-R14-177</u>	<u>2HR-253</u>	<u>177</u> 13	[REDACTED] (*)
NW Corner	<u>182-R13-177</u>	<u>2HR-236</u>	<u>177</u> 9	[REDACTED] (*)



# EXHIBIT 6

Information in this record was deleted  
in accordance with the Freedom of Information  
Act, exemptions b7c  
FOIA- 99-76

5/3/18

EDF/ENG

August 16, 1956

I, [REDACTED], make the following voluntary statement to [REDACTED] and [REDACTED], who have identified themselves to me as investigators of the Claims-Security Division, PECO Energy Company.

I was born on [REDACTED] in [REDACTED] and currently reside with my [REDACTED] at [REDACTED]

I was employed by PECO Energy (or [REDACTED]) on 8/86 and currently work as TECHNICAL ASSISTANT at LIMRICK GENERATING STATION. My payroll number is [REDACTED].

ON THIS DATE I HAVE SHOWN COPIES OF SURVEILLANCE TEST S.T. -7-022-951-0, "FIRE HOSE STATION VISUAL INSPECTION" FOR THE DATES OF 5/27/56, 4/30/56, 6/8/55 AND 4/3/55. I SIGNED EACH OF THESE SURVEILLANCE TESTS ON THOSE DATES AS "PERFORMED BY: " I HAVE BEEN SHOWN CARD READER REPORTS FROM THE LIMRICK GENERATING STATION WHICH INDICATES I WAS NOT IN CERTAIN AREAS TO PERFORM THE S.T. AS I HAD SIGNED AND INITIALED INDICATING I HAD BEEN IN THOSE AREAS AND PERFORMED THE VISUAL INSPECTION. I AGREE I DO NOT GO INTO THE AREAS I WAS SHOWN. I AGREE I DID NOT COMPLETE THE S.T.'S PROPERLY IN THAT I WAS NOT IN THE AREAS REQUIRED TO OBSERVE THE FIREHOSES.

I HAVE BROUGHT UP OTHER ISSUES TO MANAGEMENT ABOUT ITEMS I FELT WERE NOT PROPER IN THE FIRE PROTECTION GROUP.

IN APPROXIMATELY JANUARY 1996, I TOLD [REDACTED] ABOUT A PROGRAMATIC CONCERN I HAD ABOUT F.S.I.'s NOT CLOSED OUT WITH THE WORK ORDERS ASSOCIATED. I AM NOT SURE IF THE CORRECT COMPENSATORY MEASURES WERE DONE ON THE WORK ORDERS. MY CONCERN WAS PROGRAMATIC IN THAT I GAVE [REDACTED] A LIST OF THE WORK ORDER NUMBERS AND ASSOCIATED F.S.I.'s. I BROUGHT THIS UP TO [REDACTED] ON A OTHER OCCASIONS AND HE NEVER GAVE ME A RESPONSE AS TO WHAT WAS BEING DONE TO CORRECT THIS.

I RAISED A CONCERN TO [REDACTED] THAT THE S.I.T. INVOLVING FIRE RATED BARRIERS, S.T. # 7-022-920-1, WHICH DEALT WITH STRUCTURAL STEEL INSPECTIONS FOR CAFCOTE, THAT HE SIGNED OFF AREAS IN WHICH I FOUND, BY REVIEWING THE PREVIOUS TEST, THAT HAD AREAS THAT CAFCOTE WAS MISSING. WHEN I POINTED IT OUT TO HIM HE SAID I'LL GIVE IT ANOTHER LOOK. SOMETIME AFTER, E.T.T. TAGS WERE PLACED ON THE AREAS REQUIRING CAFCOTE. I QUESTION THE ORIGINAL INSPECTOR [REDACTED] DID AS HE DID NOT KNOW OF THE TWO AREAS MISSING CAFCOTE. THE SECOND ISSUE IN THIS S.T. IS THAT YOU CAN NOT VISUALLY INSPECT [REDACTED] ALL STRUCTURAL STEEL REQUIRED BY THE S.T. THIS HAS BEEN CONTINUALLY SIGNED OFF AS OBSERVED IN PREVIOUS TESTS.

I RAISED ISSUE TO MEMBERS OF MY WORK GROUP AS TO S.T.-7-022-730-1 "FSWS AIR/WATER NOZZLE FLOW TEST." I IN [REDACTED]

PAGE 2 OF 2  
EXHIBIT 4  
PAGE 2 OF 2

7c

TOLD BY [REDACTED] YOU CAN'T GO BY THE PROCEDURE AS YOU WOULD DUNE THE SYSTEM. I HAVE FOUND THE S.T. CONTAINS INACCURACIES TO VARIOUS LOCATIONS AND WALLE NUMBERS.

7c

ON ONE OCCASION [REDACTED] ASKED ME TO SIGN OFF ON S.T. ABOUT REVERTANT AIRBORN TEST. I DID NOT WANT TO SIGN IT AS THE DRAWINGS WE REFERENCED WERE THE WORK DRAWINGS. I ~~WAS~~ SIGNED THIS ONLY AFTER [REDACTED] BECAUSE ADVISED THE NOTATIONS WERE PUT ON THE S.T.

7c

I REVIEWED THE PRIOR S.T.'s AND FOUND THEY WERE SIGNED OFF WITH THE WORK DRAWINGS NUMBERS. THE DRAWING WERE THOSE IN THE SECTION WHICH WERE OUTDATED. I ALSO SEE THE PEOPLE DONE THE INSPECTION WERE NOT PROPERLY TRAINED. I RAISED THESE ISSUES TO ENGINE [REDACTED] OR [REDACTED]

I RAISED THE ISSUE TO THE GROUP ABOUT EFFICIENCY LIGHTING AND THE NEED FOR ADVANCING THE LIGHTS BE POINTED ON THE EQUIPMENT. I DO NOT KNOW IF A TEST WAS DELAYED TO ADDRESS THIS ISSUE.

I HAVE MADE THE ABOVE STATEMENT CONSISTENTLY OF THIS & OTHER OTHER PAGES AND THE PARTS CONTAINED HEREIN [REDACTED] [REDACTED]

EXHIBIT 6 PAGE 51 PAGE(S)

WITNESSES: [REDACTED] PECO Energy 8-16-76 [REDACTED] 8/16/76 PHH: [REDACTED]

20690566

PECO ENERGY COMPANY  
LIMERICK GENERATING STATION  
SURVEILLANCE TEST

W/O #R \_\_\_\_\_  
DATE/TIME 5-29-96 1:200  
ACTOR BY \_\_\_\_\_  
RESULTS S  
DATE COMPLETED 5/29/96

ST-7-022-951-0 FIRE HOSE STATION VISUAL INSPECTION

Test Freq.: Monthly -OR- Initiating Events: 1. Reason \_\_\_\_\_  
Tech. Spec.: 4.7.6.5..a 2. A/R No. \_\_\_\_\_

TEST RESULTS:

A. All Asterisked(\*) Steps Completed SATISFACTORY.  
Performed By: \_\_\_\_\_ (Sign/Date) [Redacted] 5/29/96 7C  
Reviewed By: \_\_\_\_\_ (Sign/Date) [Redacted] stark  
(IRM Mgr. or Designee)

B. One or More Asterisked(\*) Steps Test Results UNSATISFACTORY.  
Performed By: \_\_\_\_\_ (Sign/Date) \_\_\_\_\_  
Informed of Test Results (CO or RO) \_\_\_\_\_ (Sign/Date) \_\_\_\_\_  
(Time) \_\_\_\_\_  
Shift Supervision: \_\_\_\_\_ (Sign/Date) \_\_\_\_\_  
Corrective Action: \_\_\_\_\_ A/R No.: \_\_\_\_\_  
Initiated By: \_\_\_\_\_ (Sign/Date) \_\_\_\_\_  
IMMEDIATELY NOTIFY SENIOR PLANT STAFF MEMBER  
Person Notified: \_\_\_\_\_ (Name) \_\_\_\_\_  
Date/Time Notified: \_\_\_\_\_ (Date/Time) \_\_\_\_\_  
Notified By: \_\_\_\_\_ (Sign) \_\_\_\_\_

ADDITIONAL ACTION/TEST COMMENTS:

If any entry is made in Additional Action/Test Comments section,  
person making initial entry sign here.

Sign/Date: \_\_\_\_\_  
EXHIBIT 6  
PAGE 4 OF 51 PAGE(S)

1.0 PURPOSE

To verify operability of accessible fire hose stations by visual inspection to assure all required equipment is present.

2.0 REFERENCES

2.1 N.F.P.A. 1962: Standard for the Care, Use and Maintenance of Fire Hose Including Connections and Nozzles.

2.2 LGS Fire Protection evaluation Report

2.3 M-22, P&ID - Fire Protection

3.0 TEST EQUIPMENT

None

4.0 PRECAUTIONS & LIMITATIONS

4.1 IF a procedural step cannot be completed OR any other difficulty is encountered during this test, THEN make a comment in the Additional Action/Test Comments section.

4.2 IF a step denoted as a Tech. Spec. Requirement marked with an asterisk (\*) cannot be successfully completed, THEN notify Shift Supervision immediately.

4.3 Signoff step marked SO in left-hand margin of body of procedure require a signoff on Table 1(2,3).

5.0 PREREQUISITES

5.1 None.

6.0 PROCEDURE

NOTE: It is the responsibility of the person or persons performing this test to ensure all blanks are correctly and completely filled in.

6.1 FIRE HOSE STATION VISUAL INSPECTION

SO 6.1.1 Verify designated hose station is equipped with fire hose AND nozzle.

a. If a hose station is inaccessible because of ALARA concerns, mark station. A.C. A.C. does not fail this test.

b. Verify all station components present.

6.1.2 Replace protective hose reel cover (if applicable).

7.0 RETURN TO NORMAL

7.1 None.

8.0 ACCEPTANCE CRITERIA

8.1 All accessible hose stations on Tables 1(2,3) are completed satisfactorily.

NOTE: At test completion, ensure cover sheet is correctly and completely filled in.

NOTE: If any entry is made in this section, sign/date cover sheet under Additional Action/Test Comments.

ADDITIONAL ACTION/TEST COMMENTS: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

FIRE HOSE STATION VISUAL INSPECTION

TABLE 1 - COMMON

NOTE: Extra hose placed in a box listed after any given hose station on tables 1, 2, or 3 is considered part of the preceding hose station.

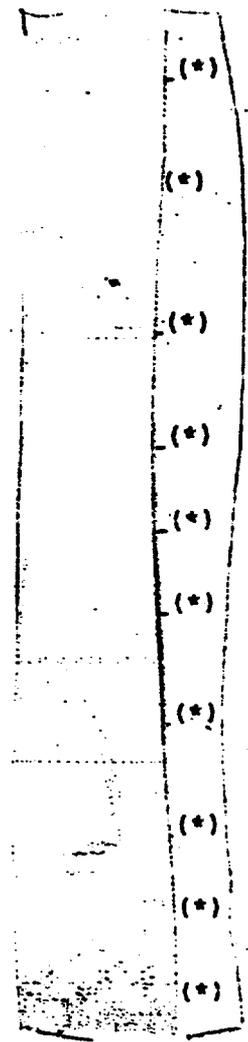
<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
Stairwell NW Corner	<u>704-A8-350</u>	<u>1HR-141</u>	<u>350</u> 5	(*)
Stairwell, Outside SGTS Rm.	<u>625-A8-332</u>	<u>1HR-140</u>	<u>332</u> 4	(*)
Box (Extra Hose) Near Hose Reel 1HR-140 (1) 100' Section	<u>625-A8-332</u>		<u>332</u> 4	(*)
Stairwell Outside Fan Room	<u>619-A8-304</u>	<u>1HR-103</u>	<u>304</u> 1	(*)
Stairwell, Outside Aux. Equip. Rm.	<u>519-A8-289</u>	<u>1HR-130</u>	<u>289</u> 7	(*)
Stairwell, Outside Cable Spreading Room	<u>402-A8-254</u>	<u>1HR-250</u>	<u>254</u> 9	(*)
Unit 2 Static Inverter Rm.	<u>453-A8-254</u>	<u>2HR-250</u>	<u>254</u> E	(*)
W. Side Wall Outside 4Kv Switchgear & Battery Rm. 434	<u>447-T3-239</u>	<u>1HR-251</u>	<u>239</u> 13	(*)
Box (Extra Hose) Near Hose Reel 1HR-251 (1) 100' Section	<u>447-T3-239</u>		<u>239</u> 13	(*)

*7C*

FIRE HOSE STATION VISUAL INSPECTION

TABLE 1 - COMMON

<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Control Enclosure:</u>				
E. Side Wall Outside 4 Kv Switchgear & Battery Rm. 454	<u>465-T3-239</u>	<u>2HR-251</u>	<u>239</u> 28	(*)
Corridor 448 SW Side of 4Kv Swgr & Battery Rms	<u>448-T7-239</u>	<u>1HR-124</u>	<u>239</u> 18	(*)
Box (Extra Hose) Near Hose Reel 1HR-124 (1) 100' Section	<u>448-T7-239</u>		<u>239</u> 18	(*)
Corridor 466 SE Side of 4Kv Swgr & Battery Rms	<u>466-T9-239</u>	<u>2HR-122</u>	<u>239</u> 26	(*)
Outside 13Kv Swgr Room	<u>338-T7-217</u>	<u>1HR-116</u>	<u>217</u> 8	(*)
Outside 13 Kv Swgr Room	<u>346-T9-217</u>	<u>2HR-116</u>	<u>217</u> 53	(*)
Corridor 265, wall W. Side of 258A Control Enclosure	<u>265-T7-200</u>	<u>1HR-120</u>	<u>200</u> 2	(*)
Corridor 277, wall E. Side of 263A Control Enclosure	<u>277-T9-200</u>	<u>2HR-120</u>	<u>200</u> 14	(*)
Wall, Corridor 164	<u>164-A8-180</u>	<u>1HR-121</u>	<u>180</u> 1	(*)
Wall, Corridor 166	<u>166-A6-180</u>	<u>2HR-121</u>	<u>180</u> 2	(*)



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FIRE HOSE STATION VISUAL INSPECTION

TABLE 1 - COMMON

<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Reactor Enclosure:</u>				
NW Corner Refuel Floor	<u>700-R11-352</u>	<u>1HR-202</u>	<u>352</u> 4	(*)
SW Corner Refuel Floor	<u>700-R15-352</u>	<u>1HR-201</u>	<u>352</u> 5	(*)
South Side of Laydown Area	<u>700-R16-352</u>	<u>1HR-204</u>	<u>352</u> 8	(*)
South Side of Laydown Area	<u>700-R17-352</u>	<u>2HR-204</u>	<u>352</u> 9	(*)
SE Corner Refuel Floor	<u>700-R18-352</u>	<u>2HR-201</u>	<u>352</u> 12	(*)
NE Corner Refuel Floor	<u>700-R14-352</u>	<u>2HR-202</u>	<u>352</u> 13	(*)
North Side Spent Fuel Pool	<u>700-R13-352</u>	<u>2HR-203</u>	<u>352</u> 18	(*)
North Side Spent Fuel Pool	<u>700-R12-352</u>	<u>1HR-203</u>	<u>352</u> 19	(*)

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FIRE HOSE STATION VISUAL INSPECTION

TABLE 2 - UNIT 1

<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Reactor Enclosure:</u>				
SW Corner	<u>613-R15-331</u>	<u>1HR-205</u>	<u>331</u> 1	(*)
RERS Fan Area SW Corner	<u>605-R15-313</u>	<u>1HR-207</u>	<u>313</u> 3	(*)
Box (Extra Hose) Near Hose Reel 1HR-207 (1) 100' Section	<u>605-R15-313</u>		<u>313</u> 3	(*)
Laydown Area 601 NW Corner By Elevator	<u>601-R11-313</u>	<u>1HR-208</u>	<u>313</u> 2	(*)
SE Corner Near Refuel floor Exhaust Fan	<u>605-R16-313</u>	<u>1HR-209</u>	<u>313</u> 7	(*)
Box (Extra Hose) Near Hose Reel 1HR-209 (1) 100' Section	<u>605-R16-313</u>		<u>313</u> 7	(*)
NE Corner Near 2-124 Load Center	<u>602-R12-313</u>	<u>1HR-210</u>	<u>313</u> 9	(*)
Corridor 506 NW Corner	<u>506-R11-283</u>	<u>1HR-216</u>	<u>283</u> 2	(*)
Corridor 506 West Wall	<u>506-R15-283</u>	<u>1HR-215</u>	<u>283</u> 3	(*)
SE Corner Near Hatchway	<u>500-R16-283</u>	<u>1HR-217</u>	<u>283</u> 5	(*)
NE Corner	<u>506-R12-283</u>	<u>1HR-218</u>	<u>283</u> 8	(*)

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FIRE HOSE STATION VISUAL INSPECTION

TABLE 2 - UNIT 1

<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Reactor Enclosure:</u>				
West Wall Near CRD Repair Area	<u>402A-R16-253</u>	<u>1HR-223</u>	<u>253</u> 4	(*)
NW Corner Next To Elevator	<u>402-R11-253</u>	<u>1HR-224</u>	<u>253</u> 2	(*)
Box (Extra Hose) Near Hose Reel 1HR-224 (1) 100' Section	<u>402-R11-253</u>		<u>253</u> 2	(*)
SE Corner Near Drywell Personnel Lock	<u>402-R16-253</u>	<u>1HR-225</u>	<u>253</u> 6	(*)
Box (Extra Hose) Near Hose Reel 1HR-225 (1) 100' Section	<u>402-R16-253</u>		<u>253</u> 6	(*)
E. Wall Near Tip Machines	<u>402-R12-253</u>	<u>1HR-226</u>	<u>253</u> 7	(*)
W. Wall Near HPCI Equip. Hatch	<u>304-R15-217</u>	<u>1HR-232</u>	<u>217</u> 30	(*)
NW Corner Next To Elevator	<u>304-R11-217</u>	<u>1HR-233</u>	<u>217</u> 29	(*)
E. Wall Near Equip. Airlock	<u>304-R16-217</u>	<u>1HR-234</u>	<u>217</u> 33	(*)
NE Corner Near MCC D124-R-G at Stairwell	<u>304-R12-217</u>	<u>1HR-235</u>	<u>217</u> 34	(*)
W. Wall Near MCC D134-R-H	<u>304-R15-201</u>	<u>1HR-240</u>	<u>201</u> 3	(*)

*Handwritten mark resembling the number 74.*

FIRE HOSE STATION VISUAL INSPECTION

TABLE 2 - UNIT 1

<u>LOCATION</u>	<u>Room/Area/EI.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Reactor Enclosure:</u>				
Box (Extra Hose) Near Hose Reel 1HR-240 (1) 100' Section	<u>200-R15-201</u>		<u>201</u> 5	- (+)
NW Corner Next To Elevator	<u>200-R11-201</u>	<u>1HR-241</u>	<u>201</u> 2	- (+)
E. Wall Near RECW Heat Exchanger	<u>207-R16-201</u>	<u>1HR-242</u>	<u>201</u> 7	- (+)
NE Corner Near RECW Pumps at Stairwell	<u>207-R12-201</u>	<u>1HR-243</u>	<u>201</u> 8	- (+)
SW Corner Bottom of Stairwell	<u>103-R15-177</u>	<u>1HR-252</u>	<u>177</u> 4	- (+)
NW Corner By Elevator	<u>111-R11-177</u>	<u>1HR-253</u>	<u>177</u> 2	- (+)
NE Corner At Stairwell	<u>115-R12-177</u>	<u>1HR-142</u>	<u>177</u> 6	- (+)

**FIRE HOSE STATION VISUAL INSPECTION**

**TABLE 3 - UNIT 2**

LOCATION  
 Room/Area/EL  
 Hose Rack No.  
 Station Number  
 Properly Equipped  
 6.3.1

Reactor Enclosure:

Station Number	Hose Rack No.	Room/Area/EL	LOCATION
331	6	552-R18-331	SE Corner At Stairwell
313	16	641-R18-313	RERS Fan Area SE Corner
313	16	641-R18-313	Box (Extra Hose) Near Hose Reel ZHR-207 (1) 100' Section
313	12	641-R17-313	SW Corner Near Refuel Floor Exhaust Fan Duct
313	17	636-R14-313	Laydown Area NE Corner
313	10	636-R13-313	NW Corner Near Load Center
283	17	550-R14-283	Corridor 580 NE Corner
283	16	550-R18-283	Corridor 580 SE Corner
283	14	574-R17-283	SIC Pump Area SW Corner
283	11	550-R13-283	NW Corner
253	13	475-R16-253	SE Corner Near CRD Maint. Room

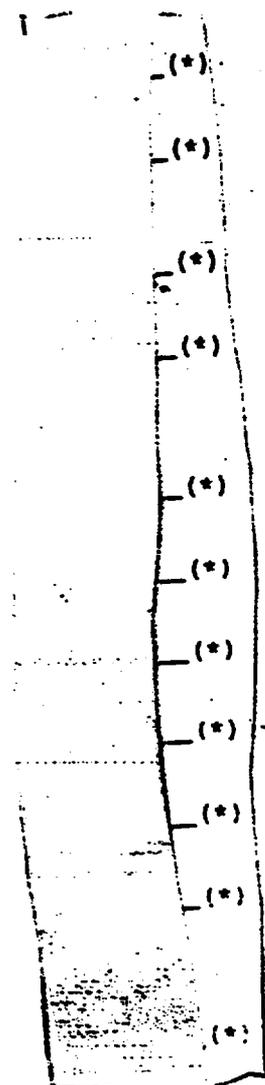
EXHIBIT 4  
 PAGE 10 OF 51 PAGES(S)  
 7C

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FIRE HOSE STATION VISUAL INSPECTION

TABLE 3 - UNIT 2

<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Reactor Enclosure:</u>				
Box (Extra Hose) Near Hose Reel 2HR-223 (1) 100' Section	<u>475-R18-253</u>		<u>253</u> 13	(*)
NE Corner Near Stair No. 6	<u>475-R14-253</u>	<u>2HR-224</u>	<u>253</u> 15	(*)
W. Wall Near Unit 1/Unit 2 Airlock	<u>475-R17-253</u>	<u>2HR-225</u>	<u>253</u> 10	(*)
W. Wall Near Stair No. 2	<u>475-R13-253</u>	<u>2HR-226</u>	<u>253</u> 9	(*)
Box (Extra Hose) Near Hose Reel 2HR-226 (1) 100' Section	<u>475-R13-253</u>		<u>253</u> 9	(*)
NE Corner Next To Elevator	<u>370-R14-217</u>	<u>2HR-233</u>	<u>217</u> 44	(*)
SE Corner Near RCIC Equip. Hatch	<u>370-R18-217</u>	<u>2HR-232</u>	<u>217</u> 43	(*)
W. Wall Near Airlock 366	<u>370-R17-217</u>	<u>2HR-234</u>	<u>217</u> 40	(*)
NE Corner Near Stair No. 2	<u>370-R13-217</u>	<u>2HR-235</u>	<u>217</u> 39	(*)
SE Corner near Stair No. 5	<u>279-R18-201</u>	<u>2HR-240</u>	<u>201</u> 14	(*)
Box (Extra Hose) Near Hose Reel 2HR-240 (1) 100' Section	<u>279-R18-201</u>		<u>201</u> 12	(*)



FIRE HOSE STATION VISUAL INSPECTION

TABLE 3 - UNIT 2

<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Reactor Enclosure:</u>				
NE Corner Near Stair No. 6	<u>279-R14-201</u>	<u>2HR-241</u>	<u>201</u> 15	(*)
W. Wall Near RECW Hatch	<u>284-R17-201</u>	<u>2HR-242</u>	<u>201</u> 10	(*)
NW Corner Near RECW Pumps By Stairwell	<u>284-R13-201</u>	<u>2HR-243</u>	<u>201</u> 9	(*)
SE Corner Bottom of Stairwell	<u>178-R18-177</u>	<u>2HR-252</u>	<u>177</u> 11	(*)
NE Corner By Elevator	<u>186-R14-177</u>	<u>2HR-253</u>	<u>177</u> 13	(*)
NW Corner	<u>162-R13-177</u>	<u>2HR-236</u>	<u>177</u> 9	(*)

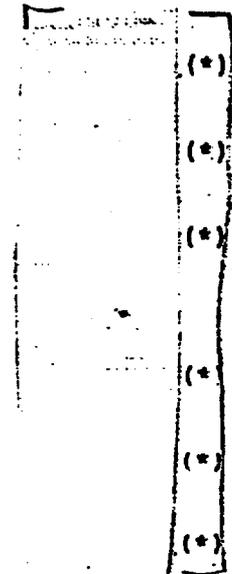


EXHIBIT 6  
PAGE 15 OF 51 PAGE(S)  
Portion 7C

RC666339

PECC ENERGY COMPANY  
LIMERICK GENERATING STATION  
SURVEILLANCE TEST

W/O #R RC666339  
DATE/TIME 4-30-96/1200  
ACTING BY \_\_\_\_\_ OF Y/N  
RECORDS \_\_\_\_\_  
DATE VERIFIED 5/1/96 BY \_\_\_\_\_

ST-7-022-951-0 FIRE HOSE STATION VISUAL INSPECTION

Test Freq.: Monthly -CR- Initiating Events: 1. Reason \_\_\_\_\_  
Test. Spec.: 4.7.5.3.3 2. A/R No. \_\_\_\_\_

TEST RESULTS:

A. All Asterisked(\*) Steps Completed SATISFACTORILY.

Performed By: \_\_\_\_\_ (Sign/Date) \_\_\_\_\_ 4-30-96  
Reviewed By: \_\_\_\_\_ (Sign/Date) \_\_\_\_\_ 5/1/96  
IRM Mgr. or Designee

B. One or More Asterisked(\*) Steps Test Results UNSATISFACTORY.

Performed By: \_\_\_\_\_ (Sign/Date) \_\_\_\_\_  
Informed of Test Results  
CC or RC \_\_\_\_\_ (Sign/Date) \_\_\_\_\_  
Time: \_\_\_\_\_  
Shift Supervision: \_\_\_\_\_ (Sign/Date) \_\_\_\_\_  
Corrective Action: \_\_\_\_\_ A/R No.: \_\_\_\_\_  
Initiated By: \_\_\_\_\_ (Sign/Date) \_\_\_\_\_

IMMEDIATELY NOTIFY SENIOR PLANT STAFF MEMBER

Person Notified: \_\_\_\_\_ Name: \_\_\_\_\_  
Date/Time Notified: \_\_\_\_\_ Date/Time: \_\_\_\_\_  
Notified By: \_\_\_\_\_ Sig.: \_\_\_\_\_

ADDITIONAL ACTION TEST COMMENTS:

If any entry is made in Additional Action Test Comments section,  
this is making initial entry sign only.

1.0 PURPOSE

To verify operability of accessible fire hose stations by visual inspection to assure all required equipment is present.

2.0 REFERENCES

- 2.1 N.F.P.A. 1962: Standard for the Care, Use and Maintenance of Fire Hose Including Connections and Nozzles.
- 2.2 LGS Fire Protection evaluation Report
- 2.3 M-22, P&ID - Fire Protection

3.0 TEST EQUIPMENT

None

4.0 PRECAUTIONS & LIMITATIONS

- 4.1 IF a procedural step cannot be completed OR any other difficulty is encountered during this test, THEN make a comment in the Additional Action/Test Comments section.
- 4.2 IF a step denoted as a Tech. Spec. Requirement marked with an asterisk (\*) cannot be successfully completed, THEN notify Shift Supervision immediately.
- 4.3 Signoff step marked SO in left-hand margin of body of procedure require a signoff on Table 1 2.3.

5.0 PREREQUISITES

- 5.1 None.

6.1 PROCEDURE

NOTE: It is the responsibility of the person or persons performing this test to ensure all blanks are correctly and completely filled in.

6.1 FIRE HOSE STATION VISUAL INSPECTION

- 6.1.1 Verify designated hose station is equipped with fire hose AND nozzle.
  - a. If a hose station is inaccessible because of ALARA concerns, mark station A.C. A.C. does not fail this test.
  - b. Verify all station components present.
- 6.1.2 Replace protective hose reel cover (if applicable).

7.0 RETURN TO NORMAL

7.1 None.

8.0 ACCEPTANCE CRITERIA

8.1 All accessible hose stations on Tables 1(2,3) are completed satisfactorily.

NOTE: At test completion, ensure cover sheet is correctly and completely filled in.

NOTE: If any entry is made in this section, sign/date cover sheet under Additional Action/Test Comments.

ADDITIONAL ACTION/TEST COMMENTS: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

FIRE HOSE STATION VISUAL INSPECTION

TABLE 1 - COMMON

NOTE: Extra hose placed in a box listed after any given hose station on tables 1, 2, or 3 is considered part of the preceding hose station.

<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Control Enclosure:</u>				
Stairwell NW Corner	<u>704-A8-350</u>	<u>1HR-141</u>	<u>350</u> 5	(*)
Stairwell, Outside SGTS Rm.	<u>625-A8-332</u>	<u>1HR-140</u>	<u>332</u> 4	(*)
Box (Extra Hose) Near Hose Reel 1HR-140 (1) 100' Section	<u>625-A8-332</u>		<u>332</u> 4	(*)
Stairwell Outside Fan Room	<u>619-A8-304</u>	<u>1HR-103</u>	<u>304</u> 1	(*)
Stairwell, Outside Aux. Equip. Rm.	<u>519-A8-289</u>	<u>1HR-130</u>	<u>269</u> 7	(*)
Stairwell, Outside Cable Spreading Room	<u>402-A8-254</u>	<u>1HR-250</u>	<u>254</u> 9	(*)
Unit 2 Static Inverter Rm.	<u>453-A8-254</u>	<u>2HR-250</u>	<u>254</u> 8	(*)
W. Side Wall Outside 4Kv Switchgear & Battery Rm. 434	<u>447-T3-239</u>	<u>1HR-251</u>	<u>239</u> 13	(*)
Box (Extra Hose) Near Hose Reel 1HR-251 (1) 100' Section	<u>447-T3-239</u>		<u>239</u> 13	(*)

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FIRE HOSE STATION VISUAL INSPECTION

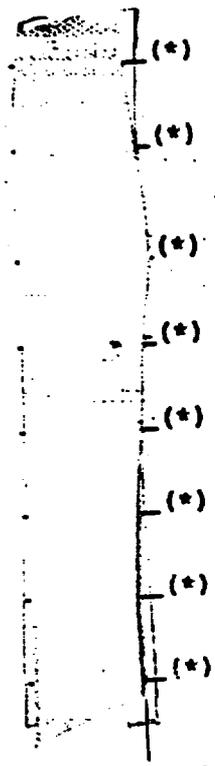
TABLE 1 - COMMON

<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Control Enclosure:</u>				
E. Side Wall Outside 4 Kv Switchgear & Battery Rm. 454	<u>465-T3-239</u>	<u>2HR-251</u>	<u>239</u> <u>28</u>	(*)
Corridor 448 SW Side of 4Kv Swgr & Battery Rms	<u>448-T7-239</u>	<u>1HR-124</u>	<u>239</u> <u>18</u>	(*)
Box (Extra Hose) Near Hose Reel 1HR-124 (1) 100' Section	<u>448-T7-239</u>		<u>239</u> <u>18</u>	(*)
Corridor 466 SE Side of 4Kv Swgr & Battery Rms	<u>466-T9-239</u>	<u>2HR-122</u>	<u>239</u> <u>26</u>	(*)
Outside 13Kv Swgr Room	<u>338-T7-217</u>	<u>1HR-116</u>	<u>217</u> <u>8</u>	(*) 7C
Outside 13 Kv Swgr Room	<u>346-T9-217</u>	<u>2HR-116</u>	<u>217</u> <u>53</u>	(*)
Corridor 265, wall W. Side of 258A Control Enclosure	<u>265-T7-200</u>	<u>1HR-120</u>	<u>200</u> <u>2</u>	(*)
Corridor 277, wall E. Side of 263A Control Enclosure	<u>277-T9-200</u>	<u>2HR-120</u>	<u>200</u> <u>14</u>	(*)
Wall, Corridor 154	<u>164-A8-180</u>	<u>1HR-121</u>	<u>180</u> <u>1</u>	(*)
Wall, Corridor 166	<u>166-A8-180</u>	<u>2HR-121</u>	<u>180</u> <u>2</u>	(*)

FIRE HOSE STATION VISUAL INSPECTION

TABLE 1 - COMMON

<u>LOCATION</u>	<u>Room/Area/EI.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Reactor Enclosure:</u>				
NW Corner Refuel Floor	<u>700-R11-352</u>	<u>1HR-202</u>	<u>352</u> 4	(*)
SW Corner Refuel Floor	<u>700-R15-352</u>	<u>1HR-201</u>	<u>352</u> 5	(*)
South Side of Laydown Area	<u>700-R16-352</u>	<u>1HR-204</u>	<u>352</u> 8	(*)
South Side of Laydown Area	<u>700-R17-352</u>	<u>2HR-204</u>	<u>352</u> 9	(*)
SE Corner Refuel Floor	<u>700-R18-352</u>	<u>2HR-201</u>	<u>352</u> 12	(*)
NE Corner Refuel Floor	<u>700-R14-352</u>	<u>2HR-202</u>	<u>352</u> 13	(*)
North Side Spent Fuel Pool	<u>700-R13-352</u>	<u>2HR-203</u>	<u>352</u> 16	(*)
North Side Spent Fuel Pool	<u>700-R12-352</u>	<u>1HR-203</u>	<u>352</u> 19	(*)



FIRE HOSE STATION VISUAL INSPECTION

TABLE 2 - UNIT 1

<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Reactor Enclosure:</u>				
SW Corner	<u>613-R15-331</u>	<u>1HR-205</u>	<u>331</u> 1	(*)
RERS Fan Area SW Corner	<u>605-R15-313</u>	<u>1HR-207</u>	<u>313</u> 3	(*)
Box (Extra Hose) Near Hose Reel 1HR-207 (1) 100' Section	<u>605-R15-313</u>		<u>313</u> 3	(*)
Laydown Area 601 NW Corner By Elevator	<u>601-R11-313</u>	<u>1HR-208</u>	<u>313</u> 2	(*)
SE Corner Near Refuel floor Exhaust Fan	<u>605-R16-313</u>	<u>1HR-209</u>	<u>313</u> 7	(*)
Box (Extra Hose) Near Hose Reel 1HR-209 (1) 100' Section	<u>605-R16-313</u>		<u>313</u> 7	(*)
NE Corner Near D-124 Load Center	<u>602-R12-313</u>	<u>1HR-210</u>	<u>313</u> 9	(*)
Corridor 506 NW Corner	<u>506-R11-283</u>	<u>1HR-216</u>	<u>283</u> 2	(*)
Corridor 506 West Wall	<u>506-R15-283</u>	<u>1HR-215</u>	<u>283</u> 3	(*)
SE Corner Near Hatchway	<u>500-R16-283</u>	<u>1HR-217</u>	<u>283</u> 5	(*)
NE Corner	<u>506-R12-283</u>	<u>1HR-218</u>	<u>283</u> 5	(*)

7C

**FIRE HOSE STATION VISUAL INSPECTION**

**TABLE 2 - UNIT 1**

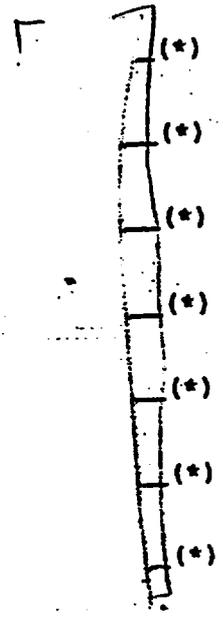
<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<b>Reactor Enclosure:</b>				
West Wall Near CRD Repair Area	<u>402A-R16-253</u>	<u>1HR-223</u>	<u>253</u> 4	(*)
NW Corner Next To Elevator	<u>402-R11-253</u>	<u>1HR-224</u>	<u>253</u> 2	(*)
Box (Extra Hose) Near Hose Reel 1HR-224 (1) 100' Section	<u>402-R11-253</u>		<u>253</u> 2	(*)
SE Corner Near Drywell Personnel Lock	<u>402-R16-253</u>	<u>1HR-225</u>	<u>253</u> 6	(*)
Box (Extra Hose) Near Hose Reel 1HR-225 (2) 100' Section	<u>402-R16-253</u>		<u>253</u> 6	(*)
E. Wall Near Tip Machines	<u>402-R12-253</u>	<u>1HR-226</u>	<u>253</u> 7	(*)
W. Wall Near HPCI Equip. Hatch	<u>304-R15-217</u>	<u>1HR-232</u>	<u>217</u> 30	(*)
NW Corner Next To Elevator	<u>304-R11-217</u>	<u>1HR-233</u>	<u>217</u> 29	(*)
E. Wall Near Equip. Airlock	<u>304-R16-217</u>	<u>1HR-234</u>	<u>217</u> 33	(*)
NE Corner Near MCC D124-R-G at Stairwell	<u>304-R12-217</u>	<u>1HR-235</u>	<u>217</u> 34	(*)
W. Wall Near MCC D134-R-H	<u>200-R15-201</u>	<u>1HR-240</u>	<u>201</u> 3	(*)

7C

FIRE HOSE STATION VISUAL INSPECTION

TABLE 2 - UNIT 1

<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Reactor Enclosure:</u>				
Box (Extra Hose) Near Hose Reel 1HR-240 (1) 100' Section	<u>200-R15-201</u>		<u>201</u> 5	(*)
NW Corner Next To Elevator	<u>200-R11-201</u>	<u>1HR-241</u>	<u>201</u> 2	(*)
E. Wall Near RECW Heat Exchanger	<u>207-R16-201</u>	<u>1HR-242</u>	<u>201</u> 7	(*)
NE Corner Near RECW Pumps at Stairwell	<u>207-R12-201</u>	<u>1HR-243</u>	<u>201</u> 8	(*)
SW Corner Bottom of Stairwell	<u>103-R15-177</u>	<u>1HR-252</u>	<u>177</u> 4	(*)
NW Corner By Elevator	<u>111-R11-177</u>	<u>1HR-253</u>	<u>177</u> 2	(*)
NE Corner At Stairwell	<u>115-R12-177</u>	<u>1HR-142</u>	<u>177</u> 6	(*)



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**FIRE HOSE STATION VISUAL INSPECTION**

**TABLE 3 - UNIT 2**

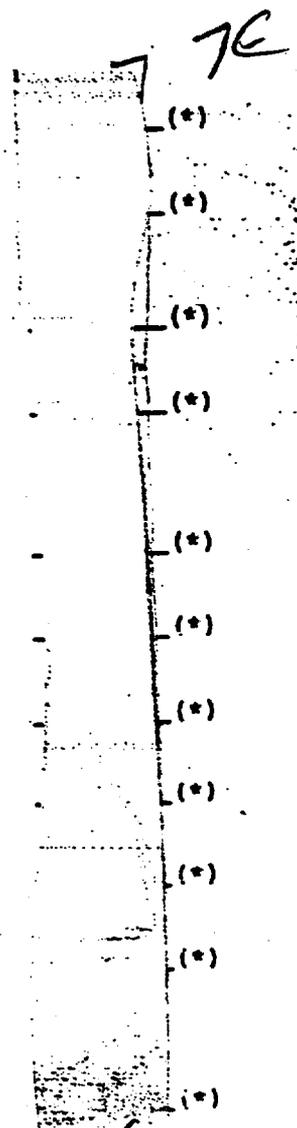
<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<b>Reactor Enclosure:</b>				
SE Corner At Stairwell	<u>652-R18-331</u>	<u>2HR-205</u>	<u>331</u> 6	(*)
RERS Fan Area SE Corner	<u>641-R18-313</u>	<u>2HR-207</u>	<u>313</u> 16	(*)
Box (Extra Hose) Near Hose Reel 2HR-207 (1) 100' Section	<u>641-R18-313</u>		<u>313</u> 16	(*)
SW Corner Near Refuel Floor Exhaust Fan Duct	<u>641-R17-313</u>	<u>2HR-209</u>	<u>313</u> 12	(*)
Laydown Area NE Corner	<u>638-R14-313</u>	<u>2HR-208</u>	<u>313</u> 17	(*)
NW Corner Near Load Center	<u>638-R13-313</u>	<u>2HR-210</u>	<u>313</u> 10	(*)
Corridor 580 NE Corner	<u>580-R14-283</u>	<u>2HR-216</u>	<u>283</u> 17	(*)
Corridor 580 SE Corner	<u>580-R18-283</u>	<u>2HR-215</u>	<u>283</u> 16	(*)
SLC Pump Area SW Corner	<u>574-R17-283</u>	<u>2HR-217</u>	<u>283</u> 14	(*)
NW Corner	<u>580-R13-283</u>	<u>2HR-218</u>	<u>283</u> 11	(*)
SE Corner Near CRD Maint. Room	<u>475-R18-253</u>	<u>2HR-223</u>	<u>253</u> 13	(*)

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FIRE HOSE STATION VISUAL INSPECTION

TABLE 3 - UNIT 2

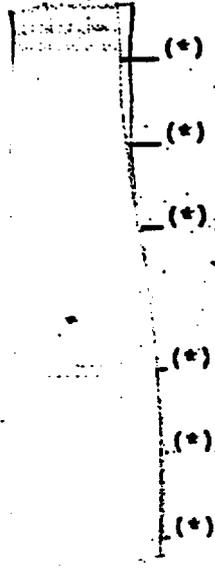
<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Reactor Enclosure:</u>				
Box (Extra Hose) Near Hose Reel 2HR-223 (1) 100' Section	<u>475-R18-253</u>		<u>253</u> 13	(*)
NE Corner Near Stair No. 6	<u>475-R14-253</u>	<u>2HR-224</u>	<u>253</u> 15	(*)
W. Wall Near Unit 1/Unit 2 Airlock	<u>475-R17-253</u>	<u>2HR-225</u>	<u>253</u> 10	(*)
W. Wall Near Stair No. 2	<u>475-R13-253</u>	<u>2HR-226</u>	<u>253</u> 9	(*)
Box (Extra Hose) Near Hose Reel 2HR-226 (1) 100' Section	<u>475-R13-253</u>		<u>253</u> 9	(*)
NE Corner Next To Elevator	<u>370-R14-217</u>	<u>2HR-233</u>	<u>217</u> 44	(*)
SE Corner Near RCIC Equip. Hatch	<u>370-R18-217</u>	<u>2HR-232</u>	<u>217</u> 43	(*)
W. Wall Near Airlock 366	<u>370-R17-217</u>	<u>2HR-234</u>	<u>217</u> 40	(*)
NE Corner Near Stair No. 2	<u>370-R13-217</u>	<u>2HR-235</u>	<u>217</u> 39	(*)
SE Corner near Stair No. 5	<u>279-R16-201</u>	<u>2HR-240</u>	<u>201</u> 14	(*)
Box (Extra Hose) Near Hose Reel 2HR-240 (1) 100' Section	<u>279-R16-201</u>		<u>201</u> 12	(*)



FIRE HOSE STATION VISUAL INSPECTION

TABLE 3 - UNIT 2

<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Reactor Enclosure:</u>				
NE Corner Near Stair No. 6	<u>279-R14-201</u>	<u>2HR-241</u>	<u>201</u> 15	(*)
W. Wall Near RECW Hatch	<u>284-R17-201</u>	<u>2HR-242</u>	<u>201</u> 10	(*)
NW Corner Near RECW Pumps By Stairwell	<u>294-R13-201</u>	<u>2HR-243</u>	<u>201</u> 9	(*)
SE Corner Bottom of Stairwell	<u>178-R18-177</u>	<u>2HR-252</u>	<u>177</u> 11	(*)
NE Corner By Elevator	<u>186-R14-177</u>	<u>2HR-253</u>	<u>177</u> 13	(*)
NW Corner	<u>182-R13-177</u>	<u>2HR-236</u>	<u>177</u> 9	(*)



DATE TIME 6-8-95 1200  
BY ECF Y M  
DATE 6/9/95  
TIME 1530

PECO ENERGY COMPANY  
LIMERICK GENERATING STATION  
SURVEILLANCE TEST

ST-7-022-951-0 FIRE HOSE STATION VISUAL INSPECTION

Test Freq.: Monthly -OR- Initiating Events: 1. Reason Monthly  
Tech. Spec.: 4.7.6.5..a 2. A/R No. 20628752

TEST RESULTS:

A. All Asterisked(\*) Steps Completed SATISFACTORILY.

Performed By: \_\_\_\_\_ (Sign/Date) 6/8/95  
Reviewed By: \_\_\_\_\_ (Sign/Date) 6/8/95  
(IRM Mgr. or Designee) 1530

B. One or More Asterisked(\*) Steps Test Results UNSATISFACTORY.

Performed By: \_\_\_\_\_ (Sign/Date) \_\_\_\_\_  
Informed of Test Results (CO or RO) \_\_\_\_\_ (Sign/Date) \_\_\_\_\_  
(Time) \_\_\_\_\_  
Shift Supervision: \_\_\_\_\_ (Sign/Date) \_\_\_\_\_  
Corrective Action: \_\_\_\_\_ A/R No.: \_\_\_\_\_  
Initiated By: \_\_\_\_\_ (Sign/Date) \_\_\_\_\_

IMMEDIATELY NOTIFY SENIOR PLANT STAFF MEMBER

Person Notified: \_\_\_\_\_ (Name) \_\_\_\_\_  
Date/Time Notified: \_\_\_\_\_ (Date/Time) \_\_\_\_\_  
Notified By: \_\_\_\_\_ (Sign) \_\_\_\_\_

ADDITIONAL ACTION/TEST COMMENTS:

If any entry is made in Additional Action/Test Comments section, person making initial entry sign here.

(Sign/Date) \_\_\_\_\_



1.0 PURPOSE

To verify operability of accessible fire hose stations by visual inspection to assure all required equipment is present.

2.0 REFERENCES

- 2.1 N.F.P.A. 1962: Standard for the Care, Use and Maintenance of Fire Hose Including Connections and Nozzles.
- 2.2 LGS Fire Protection evaluation Report
- 2.3 M-22, P&ID - Fire Protection

3.0 TEST EQUIPMENT

None

4.0 PRECAUTIONS & LIMITATIONS

- 4.1 IF a procedural step cannot be completed OR any other difficulty is encountered during this test, THEN make a comment in the Additional Action/Test Comments section.
- 4.2 IF a step denoted as a Tech. Spec. Requirement marked with an asterisk (\*) cannot be successfully completed, THEN notify Shift Supervision immediately.
- 4.3 Signoff step marked SO in left-hand margin of body of procedure require a signoff on Table 1(2,3).

5.0 PREREQUISITES

- 5.1 None.

6.0 PROCEDURE

NOTE: It is the responsibility of the person or persons performing this test to ensure all blanks are correctly and completely filled in.

6.1 FIRE HOSE STATION VISUAL INSPECTION

SO 6.1.1 Verify designated hose station is equipped with fire hose AND nozzle.

- a. If a hose station is inaccessible because of ALARA concerns, mark station A.C. A.C. does not fail this test.
- b. Verify all station components present.

6.1.2 Replace protective hose reel cover (if applicable).

7.0 RETURN TO NORMAL

7.1 None.

8.0 ACCEPTANCE CRITERIA

8.1 All accessible hose stations on Tables 1(2,3) are completed satisfactorily.

NOTE: At test completion, ensure cover sheet is correctly and completely filled in.

NOTE: If any entry is made in this section, sign/date cover sheet under Additional Action/Test Comments.

ADDITIONAL ACTION/TEST COMMENTS: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

FIRE HOSE STATION VISUAL INSPECTION

TABLE 1 - COMMON

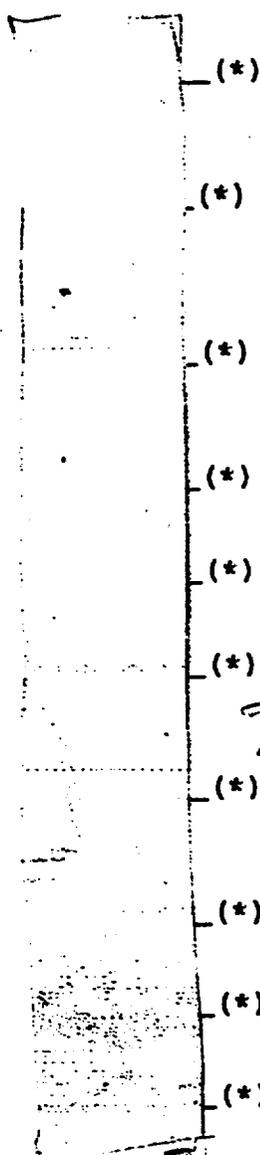
NOTE: Extra hose placed in a box listed after any given hose station on tables 1, 2, or 3 is considered part of the preceding hose station.

<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Control Enclosure:</u>				
Stairwell NW Corner	<u>704-A8-350</u>	<u>1HR-141</u>	<u>350</u> 5	(*)
Stairwell, Outside SGTS Rm.	<u>625-A8-332</u>	<u>1HR-140</u>	<u>332</u> 4	(*)
Box (Extra Hose) Near Hose Reel 1HR-140 (1) 100' Section	<u>625-A8-332</u>		<u>332</u> 4	(*)
Stairwell Outside Fan Room	<u>619-A8-304</u>	<u>1HR-103</u>	<u>304</u> 1	(*)
Stairwell, Outside Aux. Equip. Rm.	<u>519-A8-289</u>	<u>1HR-130</u>	<u>289</u> 7	(*)
Stairwell, Outside Cable Spreading Room	<u>402-A8-254</u>	<u>1HR-250</u>	<u>254</u> 9	(*)
Unit 2 Static Inverter Rm.	<u>453-A8-254</u>	<u>2HR-250</u>	<u>254</u> 8	(*)
W. Side Wall Outside 4Kv Switchgear & Battery Rm. 434	<u>447-T3-239</u>	<u>1HR-251</u>	<u>239</u> 13	(*)
Box (Extra Hose) Near Hose Reel 1HR-251 (1) 100' Section	<u>447-T3-239</u>		<u>239</u> 13	(*)

FIRE HOSE STATION VISUAL INSPECTION

TABLE 1 - COMMON

<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Control Enclosure:</u>				
E. Side Wall Outside 4 Kv Switchgear & Battery Rm. 454	<u>465-T3-239</u>	<u>2HR-251</u>	<u>239</u> 28	(*)
Corridor 448 SW Side of 4Kv Swgr & Battery Rms	<u>448-T7-239</u>	<u>1HR-124</u>	<u>239</u> 18	(*)
Box (Extra Hose) Near Hose Reel 1HR-124 (1) 100' Section	<u>448-T7-239</u>		<u>239</u> 18	(*)
Corridor 466 SE Side of 4Kv Swgr & Battery Rms	<u>466-T9-239</u>	<u>2HR-122</u>	<u>239</u> 26	(*)
Outside 13Kv Swgr Room	<u>338-T7-217</u>	<u>1HR-116</u>	<u>217</u> 8	(*)
Outside 13 Kv Swgr Room	<u>346-T9-217</u>	<u>2HR-116</u>	<u>217</u> 53	(*)
Corridor 265, wall W. Side of 258A Control Enclosure	<u>265-T7-200</u>	<u>1HR-120</u>	<u>200</u> 2	(*)
Corridor 277, wall E. Side of 263A Control Enclosure	<u>277-T9-200</u>	<u>2HR-120</u>	<u>200</u> 14	(*)
Wall, Corridor 164	<u>164-A8-180</u>	<u>1HR-121</u>	<u>180</u> 1	(*)
Wall, Corridor 166	<u>166-A8-180</u>	<u>2HR-121</u>	<u>180</u> 2	(*)



FIRE HOSE STATION VISUAL INSPECTION

TABLE 1 - COMMON

<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Reactor Enclosure:</u>				
NW Corner Refuel Floor	<u>700-R11-352</u>	<u>1HR-202</u>	<u>352</u> 4	(*)
SW Corner Refuel Floor	<u>700-R15-352</u>	<u>1HR-201</u>	<u>352</u> 5	(*)
South Side of Laydown Area	<u>700-R16-352</u>	<u>1HR-204</u>	<u>352</u> 8	(*)
South Side of Laydown Area	<u>700-R17-352</u>	<u>2HR-204</u>	<u>352</u> 9	(*)
SE Corner Refuel Floor	<u>700-R18-352</u>	<u>2HR-201</u>	<u>352</u> 12	(*)
NE Corner Refuel Floor	<u>700-R14-352</u>	<u>2HR-202</u>	<u>352</u> 13	(*)
North Side Spent Fuel Pool	<u>700-R13-352</u>	<u>2HR-203</u>	<u>352</u> 18	(*)
North Side Spent Fuel Pool	<u>700-R12-352</u>	<u>1HR-203</u>	<u>352</u> 19	(*)

FIRE HOSE STATION VISUAL INSPECTION

TABLE 1 - COMMON

<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Reactor Enclosure:</u>				
SW Corner	<u>613-R15-331</u>	<u>1HR-205</u>	<u>331</u> 1	(*)
RERS Fan Area SW Corner	<u>605-R15-313</u>	<u>1HR-207</u>	<u>313</u> 3	(*)
Box (Extra Hose) Near Hose Reel 1HR-207 (1) 100' Section	<u>605-R15-313</u>		<u>313</u> 3	(*)
Laydown Area 601 NW Corner By Elevator	<u>601-R11-313</u>	<u>1HR-208</u>	<u>313</u> 2	(*)
SE Corner Near Refuel floor Exhaust Fan	<u>605-R16-313</u>	<u>1HR-209</u>	<u>313</u> 7	(*)
Box (Extra Hose) Near Hose Reel 1HR-209 (1) 100' Section	<u>605-R16-313</u>		<u>313</u> 7	(*)
NE Corner Near D-124 Load Center	<u>602-R12-313</u>	<u>1HR-210</u>	<u>313</u> 9	(*)
Corridor 506 NW Corner	<u>506-R11-283</u>	<u>1HR-216</u>	<u>283</u> 2	(*)
Corridor 506 West Wall	<u>506-R15-283</u>	<u>1HR-215</u>	<u>283</u> 3	(*)
SE Corner Near Hatchway	<u>500-R16-283</u>	<u>1HR-217</u>	<u>283</u> 5	(*)
NE Corner	<u>506-R12-283</u>	<u>1HR-218</u>	<u>283</u> 8	(*)

FIRE HOSE STATION VISUAL INSPECTION

TABLE 1 - COMMON

<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Reactor Enclosure:</u>				
West Wall Near CRD Repair Area	<u>402A-R16-253</u>	<u>1HR-223</u>	<u>253</u> 4	(*)
NW Corner Next To Elevator	<u>402-R11-253</u>	<u>1HR-224</u>	<u>253</u> 2	(*)
Box (Extra Hose) Near Hose Reel 1HR-224 (1) 100' Section	<u>402-R11-253</u>		<u>253</u> 2	(*)
SE Corner Near Drywell Personnel Lock	<u>402-R16-253</u>	<u>1HR-225</u>	<u>253</u> 6	(*)
Box (Extra Hose) Near Hose Reel 1HR-225 (1) 100' Section	<u>402-R16-253</u>		<u>253</u> 6	(*)
E. Wall Near Tip Machines	<u>402-R12-253</u>	<u>1HR-226</u>	<u>253</u> 7	(*)
W. Wall Near HPCI Equip. Hatch	<u>304-R15-217</u>	<u>1HR-232</u>	<u>217</u> 30	(*)
NW Corner Next To Elevator	<u>304-R11-217</u>	<u>1HR-233</u>	<u>217</u> 29	(*)
E. Wall Near Equip. Airlock	<u>304-R16-217</u>	<u>1HR-234</u>	<u>217</u> 33	(*)
NE Corner Near MCC D124-R-G at Stairwell	<u>304-R12-217</u>	<u>1HR-235</u>	<u>217</u> 34	(*)
W. Wall Near MCC D134-R-H	<u>200-R15-201</u>	<u>1HR-240</u>	<u>201</u> 3	(*)

FIRE HOSE STATION VISUAL INSPECTION

TABLE 1 - COMMON

<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Reactor Enclosure:</u>				
Box (Extra Hose) Near Hose Reel 1HR-240 (1) 100' Section	<u>200-R15-201</u>		<u>201</u> 5	(*)
NW Corner Next To Elevator	<u>200-R11-201</u>	<u>1HR-241</u>	<u>201</u> 2	(*)
E. Wall Near RECW Heat Exchanger	<u>207-R16-201</u>	<u>1HR-242</u>	<u>201</u> 7	(*)
NE Corner Near RECW Pumps at Stairwell	<u>207-R12-201</u>	<u>1HR-243</u>	<u>201</u> 8	(*)
SW Corner Bottom of Stairwell	<u>103-R15-177</u>	<u>1HR-252</u>	<u>177</u> 4	(*)
NW Corner By Elevator	<u>111-R11-177</u>	<u>1HR-253</u>	<u>177</u> 2	(*)
NE Corner At Stairwell	<u>115-R12-177</u>	<u>1HR-142</u>	<u>177</u> 6	(*)

FIRE HOSE STATION VISUAL INSPECTION

TABLE 1 - COMMON

<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Reactor Enclosure:</u>				
SE Corner At Stairwell	<u>652-R18-331</u>	<u>2HR-205</u>	<u>331</u> 6	(*)
RERS Fan Area SE Corner	<u>641-R18-313</u>	<u>2HR-207</u>	<u>313</u> 16	(*)
Box (Extra Hose) Near Hose Reel 2HR-207 (1) 100' Section	<u>641-R18-313</u>		<u>313</u> 16	(*)
SW Corner Near Refuel Floor Exhaust Fan Duct	<u>641-R17-313</u>	<u>2HR-209</u>	<u>313</u> 12	(*)
Laydown Area NE Corner	<u>638-R14-313</u>	<u>2HR-208</u>	<u>313</u> 17	(*)
NW Corner Near Load Center	<u>638-R13-313</u>	<u>2HR-210</u>	<u>313</u> 10	(*)
Corridor 580 NE Corner	<u>580-R14-283</u>	<u>2HR-216</u>	<u>283</u> 17	(*)
Corridor 580 SE Corner	<u>580-R18-283</u>	<u>2HR-215</u>	<u>283</u> 16	(*)
SLC Pump Area SW Corner	<u>574-R17-283</u>	<u>2HR-217</u>	<u>283</u> 14	(*)
NW Corner	<u>580-R13-283</u>	<u>2HR-218</u>	<u>283</u> 11	(*)
SE Corner Near CRD Maint. Room	<u>475-R18-253</u>	<u>2HR-223</u>	<u>253</u> 13	(*)

FIRE HOSE STATION VISUAL INSPECTION

TABLE 1 - COMMON

<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Reactor Enclosure:</u>				
Box (Extra Hose) Near Hose Reel 2HR-223 (1) 100' Section	<u>475-R18-253</u>		<u>253</u> 13	(*)
NE Corner Near Stair No. 6	<u>475-R14-253</u>	<u>2HR-224</u>	<u>253</u> 15	(*)
W. Wall Near Unit 1/Unit 2 Airlock	<u>475-R17-253</u>	<u>2HR-225</u>	<u>253</u> 10	(*)
W. Wall Near Stair No. 2	<u>475-R13-253</u>	<u>2HR-226</u>	<u>253</u> 9	(*)
Box (Extra Hose) Near Hose Reel 2HR-226 (1) 100' Section	<u>475-R13-253</u>		<u>253</u> 9	(*)
NE Corner Next To Elevator	<u>370-R14-217</u>	<u>2HR-233</u>	<u>217</u> 44	(*)
SE Corner Near RCIC Equip. Hatch	<u>370-R18-217</u>	<u>2HR-232</u>	<u>217</u> 43	(*)
W. Wall Near Airlock 366	<u>370-R17-217</u>	<u>2HR-234</u>	<u>217</u> 40	(*)
NW NE Corner Near Stair No. 2	<u>370-R13-217</u>	<u>2HR-235</u>	<u>217</u> 39	(*)
SE Corner near Stair No. 5	<u>279-R18-201</u>	<u>2HR-240</u>	<u>201</u> 14	(*)
Box (Extra Hose) Near Hose Reel 2HR-240 (1) 100' Section	<u>279-R18-201</u>		<u>201</u> 12	(*)

FIRE HOSE STATION VISUAL INSPECTION

TABLE 1 - COMMON

<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Reactor Enclosure:</u>				
NE Corner Near Stair No. 6	<u>279-R14-201</u>	<u>2HR-241</u>	<u>201</u> 15	(*)
W. Wall Near RECW Hatch	<u>284-R17-201</u>	<u>2HR-242</u>	<u>201</u> 10	(*)
NW Corner Near RECW Pumps By Stairwell	<u>284-R13-201</u>	<u>2HR-243</u>	<u>201</u> 9	(*)
SE Corner Bottom of Stairwell	<u>178-R18-177</u>	<u>2HR-252</u>	<u>177</u> 11	(*)
NE Corner By Elevator	<u>186-R14-177</u>	<u>2HR-253</u>	<u>177</u> 13	(*)
NW Corner	<u>182-R13-177</u>	<u>2HR-236</u>	<u>177</u> 9	(*)

7C

KU619710

PECO ENERGY COMPANY  
LIMERICK GENERATING STATION  
SURVEILLANCE TEST

*[Handwritten signature]*  
6/29/94

ST-7-022-951-0 FIRE HOSE STATION VISUAL INSPECTION

Test Freq.: Monthly -OR- Initiating Events: 1. Reason Monthly  
Tech. Spec.: 4.7.6.5..a 2. A/R No. RO619710

TEST RESULTS:

A. All Asterisked(\*) Steps Completed SATISFACTORILY

Performed By: \_\_\_\_\_ (Sign/Date) 4/3/95  
Reviewed By: (IRM Mgr. or Designee) (Sign/Date) 4/3/95

B. One or More Asterisked(\*) Steps Test Results UNSATISFACTORY.

Performed By: \_\_\_\_\_ (Sign/Date) \_\_\_\_\_  
Informed of Test Results (CO or RO) (Sign/Date) \_\_\_\_\_  
(Time) \_\_\_\_\_  
Shift Supervision: \_\_\_\_\_ (Sign/Date) \_\_\_\_\_  
Corrective Action: \_\_\_\_\_ A/R No.: \_\_\_\_\_

Initiated By: \_\_\_\_\_ (Sign/Date) \_\_\_\_\_

IMMEDIATELY NOTIFY SENIOR PLANT STAFF MEMBER

Person Notified: \_\_\_\_\_ (Name) \_\_\_\_\_  
Date/Time Notified: \_\_\_\_\_ (Date/Time) \_\_\_\_\_  
Notified By: \_\_\_\_\_ (Sign) \_\_\_\_\_

ADDITIONAL ACTION/TEST COMMENTS:

If any entry is made in Additional Action/Test Comments section,  
person making initial entry sign here.

(Sign/Date) \_\_\_\_\_

**CONTROLLED COPY  
VALID ONLY  
WHEN RED**

W/O #R 2619710  
DATE/TIME 4/3/95 1200  
ACTION BY \_\_\_\_\_ COF Y+H  
RESULTS 5  
DATE VERIFIED 4/5/95 BY \_\_\_\_\_  
EXHIBIT 6  
PAGE 40 OF 51 PAGE(S)

1.0 PURPOSE

To verify operability of accessible fire hose stations by visual inspection to assure all required equipment is present.

2.0 REFERENCES

- 2.1 N.F.P.A. 1962: Standard for the Care, Use and Maintenance of Fire Hose Including Connections and Nozzles.
- 2.2 LGS Fire Protection evaluation Report
- 2.3 M-22, P&ID - Fire Protection

3.0 TEST EQUIPMENT

None

4.0 PRECAUTIONS & LIMITATIONS

- 4.1 IF a procedural step cannot be completed OR any other difficulty is encountered during this test, THEN make a comment in the Additional Action/Test Comments section.
- 4.2 IF a step denoted as a Tech. Spec. Requirement marked with an asterisk (\*) cannot be successfully completed, THEN notify Shift Supervision immediately.
- 4.3 Signoff step marked SO in left-hand margin of body of procedure require a signoff on Table 1(2,3).

5.0 PREREQUISITES

- 5.1 None.

6.0 PROCEDURE

NOTE: It is the responsibility of the person or persons performing this test to ensure all blanks are correctly and completely filled in.

6.1 FIRE HOSE STATION VISUAL INSPECTION

SO 6.1.1 Verify designated hose station is equipped with fire hose AND nozzle.

- a. If a hose station is inaccessible because of ALARA concerns, mark station A.C. A.C. does not fail this test.
- b. Verify all station components present.

6.1.2 Replace protective hose reel cover (if applicable).

7.0 RETURN TO NORMAL

7.1 None.

8.0 ACCEPTANCE CRITERIA

8.1 All accessible hose stations on Tables 1(2,3) are completed satisfactorily.

NOTE: At test completion, ensure cover sheet is correctly and completely filled in.

NOTE: If any entry is made in this section, sign/date cover sheet under Additional Action/Test Comments.

ADDITIONAL ACTION/TEST COMMENTS: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

FIRE HOSE STATION VISUAL INSPECTION

TABLE 1 - COMMON

NOTE: Extra hose placed in a box listed after any given hose station on tables 1, 2, or 3 is considered part of the preceding hose station.

<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Control Enclosure:</u>				
Stairwell NW Corner	<u>704-A8-350</u>	<u>1HR-141</u>	$\frac{350}{5}$	(*)
Stairwell, Outside SGTS Rm.	<u>625-A8-332</u>	<u>1HR-140</u>	$\frac{332}{4}$	(*)
Box (Extra Hose) Near Hose Reel 1HR-140 (1) 100' Section	<u>625-A8-332</u>		$\frac{332}{4}$	(*)
Stairwell Outside Fan Room	<u>619-A8-304</u>	<u>1HR-103</u>	$\frac{304}{1}$	(*)
Stairwell, Outside Aux. Equip. Rm.	<u>519-A8-289</u>	<u>1HR-130</u>	$\frac{289}{7}$	(*)
Stairwell, Outside Cable Spreading Room	<u>402-A8-254</u>	<u>1HR-250</u>	$\frac{254}{9}$	(*)
Unit 2 Static Inverter Rm.	<u>453-A8-254</u>	<u>2HR-250</u>	$\frac{254}{8}$	(*)
W. Side Wall Outside 4Kv Switchgear & Battery Rm. 434	<u>447-T3-239</u>	<u>1HR-251</u>	$\frac{239}{13}$	(*)
Box (Extra Hose) Near Hose Reel 1HR-251 (1) 100' Section	<u>447-T3-239</u>		$\frac{239}{13}$	(*)

FIRE HOSE STATION VISUAL INSPECTION

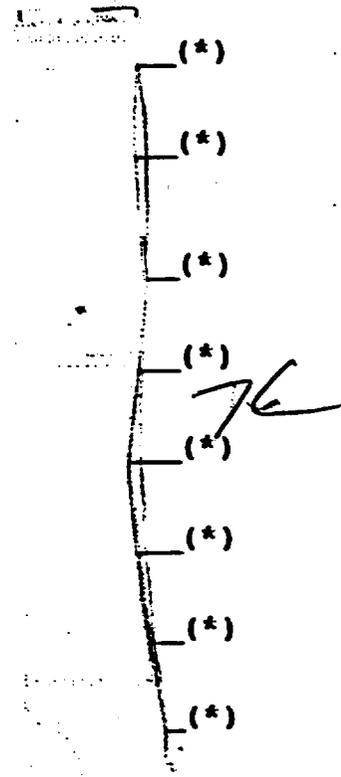
TABLE 1 - COMMON

<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Control Enclosure:</u>				
E. Side Wall Outside 4 Kv Switchgear & Battery Rm. 454	<u>465-T3-239</u>	<u>2HR-251</u>	$\frac{239}{28}$	(*)
Corridor 448 SW Side of 4Kv Swgr & Battery Rms	<u>448-T7-239</u>	<u>1HR-124</u>	$\frac{239}{18}$	(*)
Box (Extra Hose) Near Hose Reel 1HR-124 (1) 100' Section	<u>448-T7-239</u>		$\frac{239}{18}$	(*)
Corridor 466 SE Side of 4Kv Swgr & Battery Rms	<u>466-T9-239</u>	<u>2HR-122</u>	$\frac{239}{26}$	(*)
Outside 13Kv Swgr Room	<u>338-T7-217</u>	<u>1HR-116</u>	$\frac{217}{8}$	(*) TC
Outside 13 Kv Swgr Room	<u>346-T9-217</u>	<u>2HR-116</u>	$\frac{217}{53}$	(*)
Corridor 265, wall W. Side of 258A Control Enclosure	<u>265-T7-200</u>	<u>1HR-120</u>	$\frac{200}{2}$	(*)
Corridor 277, wall E. Side of 263A Control Enclosure	<u>277-T9-200</u>	<u>2HR-120</u>	$\frac{200}{14}$	(*)
Wall, Corridor 164	<u>164-A8-180</u>	<u>1HR-121</u>	$\frac{180}{1}$	(*)
Wall, Corridor 166	<u>166-A8-180</u>	<u>2HR-121</u>	$\frac{180}{2}$	(*)

FIRE HOSE STATION VISUAL INSPECTION

TABLE 1 - COMMON

<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Reactor Enclosure:</u>				
NW Corner Refuel Floor	<u>700-R11-352</u>	<u>1HR-202</u>	$\frac{352}{4}$	(*)
SW Corner Refuel Floor	<u>700-R15-352</u>	<u>1HR-201</u>	$\frac{352}{5}$	(*)
South Side of Laydown Area	<u>700-R16-352</u>	<u>1HR-204</u>	$\frac{352}{8}$	(*)
South Side of Laydown Area	<u>700-R17-352</u>	<u>2HR-204</u>	$\frac{352}{9}$	(*)
SE Corner Refuel Floor	<u>700-R18-352</u>	<u>2HR-201</u>	$\frac{352}{12}$	(*)
NE Corner Refuel Floor	<u>700-R14-352</u>	<u>2HR-202</u>	$\frac{352}{13}$	(*)
North Side Spent Fuel Pool	<u>700-R13-352</u>	<u>2HR-203</u>	$\frac{352}{18}$	(*)
North Side Spent Fuel Pool	<u>700-R12-352</u>	<u>1HR-203</u>	$\frac{352}{19}$	(*)



FIRE HOSE STATION VISUAL INSPECTION

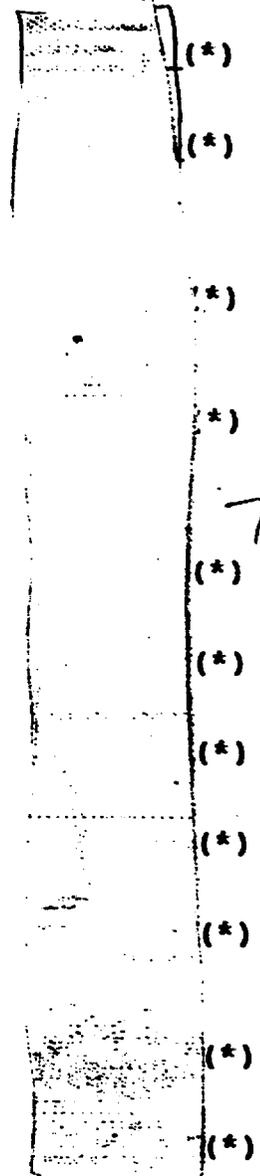
TABLE 2 - UNIT 1

<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Reactor Enclosure:</u>				
SW Corner	<u>613-R15-331</u>	<u>1HR-205</u>	<u>331</u> 1	(*)
RERS Fan Area SW Corner	<u>605-R15-313</u>	<u>1HR-207</u>	<u>313</u> 3	(*)
Box (Extra Hose) Near Hose Reel 1HR-207 (1) 100' Section	<u>605-R15-313</u>		<u>313</u> 3	(*)
Laydown Area 601 NW Corner By Elevator	<u>601-R11-313</u>	<u>1HR-208</u>	<u>313</u> 2	(*)
SE Corner Near Refuel floor Exhaust Fan	<u>605-R16-313</u>	<u>1HR-209</u>	<u>313</u> 7	(*)
Box (Extra Hose) Near Hose Reel 1HR-209 (1) 100' Section	<u>605-R16-313</u>		<u>313</u> 7	(*)
NE Corner Near D-124 Load Center	<u>602-R12-313</u>	<u>1HR-210</u>	<u>313</u> 9	(*)
Corridor 506 NW Corner	<u>506-R11-283</u>	<u>1HR-216</u>	<u>283</u> 2	(*)
Corridor 506 West Wall	<u>506-R15-283</u>	<u>1HR-215</u>	<u>283</u> 3	(*)
SE Corner Near Hatchway	<u>500-R16-283</u>	<u>1HR-217</u>	<u>283</u> 5	(*)
NE Corner	<u>506-R12-283</u>	<u>1HR-218</u>	<u>283</u> 8	(*)

FIRE HOSE STATION VISUAL INSPECTION

TABLE 2 - UNIT 1

<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Reactor Enclosure:</u>				
West Wall Near CRD Repair Area	<u>402A-R16-253</u>	<u>1HR-223</u>	$\frac{253}{4}$	(*)
NW Corner Next To Elevator	<u>402-R11-253</u>	<u>1HR-224</u>	$\frac{253}{2}$	(*)
Box (Extra Hose) Near Hose Reel 1HR-224 (1) 100' Section	<u>402-R11-253</u>		$\frac{253}{2}$	(*)
SE Corner Near Drywell Personnel Lock	<u>402-R16-253</u>	<u>1HR-225</u>	$\frac{253}{6}$	(*)
Box (Extra Hose) Near Hose Reel 1HR-225 (1) 100' Section	<u>402-R16-253</u>		$\frac{253}{6}$	(*)
E. Wall Near Tip Machines	<u>402-R12-253</u>	<u>1HR-226</u>	$\frac{253}{7}$	(*)
W. Wall Near HPCI Equip. Hatch	<u>304-R15-217</u>	<u>1HR-232</u>	$\frac{217}{30}$	(*)
NW Corner Next To Elevator	<u>304-R11-217</u>	<u>1HR-233</u>	$\frac{217}{29}$	(*)
E. Wall Near Equip. Airlock	<u>304-R16-217</u>	<u>1HR-234</u>	$\frac{217}{33}$	(*)
NE Corner Near MCC D124-R-G at Stairwell	<u>304-R12-217</u>	<u>1HR-235</u>	$\frac{217}{34}$	(*)
W. Wall Near MCC D134-R-B	<u>200-R15-201</u>	<u>1HR-240</u>	$\frac{201}{3}$	(*)



FIRE HOSE STATION VISUAL INSPECTION

TABLE 2 - UNIT 1

<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Reactor Enclosure:</u>				
Box (Extra Hose) Near Hose Reel 1HR-240 (1) 100' Section	<u>200-R15-201</u>		$\frac{201}{5}$	(*)
NW Corner Next To Elevator	<u>200-R11-201</u>	<u>1HR-241</u>	$\frac{201}{2}$	(*)
E. Wall Near RECW Heat Exchanger	<u>207-R16-201</u>	<u>1HR-242</u>	$\frac{201}{7}$	(*)
NE Corner Near RECW Pumps at Stairwell	<u>207-R12-201</u>	<u>1HR-243</u>	$\frac{201}{8}$	(*)
SW Corner Bottom of Stairwell	<u>103-R15-177</u>	<u>1HR-252</u>	$\frac{177}{4}$	(*)
NW Corner By Elevator	<u>111-R11-177</u>	<u>1HR-253</u>	$\frac{177}{2}$	(*)
NE Corner At Stairwell	<u>115-R12-177</u>	<u>1HR-142</u>	$\frac{177}{6}$	(*)

FIRE HOSE STATION VISUAL INSPECTION

TABLE 3 - UNIT 2

<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Reactor Enclosure:</u>				
SE Corner At Stairwell	<u>652-R18-331</u>	<u>2HR-205</u>	$\frac{313}{6}$	(*)
RERS Fan Area SE Corner	<u>641-R18-313</u>	<u>2HR-207</u>	$\frac{313}{16}$	(*)
Box (Extra Hose) Near Hose Reel 2HR-207 (1) 100' Section	<u>641-R18-313</u>		$\frac{313}{16}$	(*)
SW Corner Near Refuel Floor Exhaust Fan Duct	<u>641-R17-313</u>	<u>2HR-209</u>	$\frac{313}{12}$	(*)
Laydown Area NE Corner	<u>638-R14-313</u>	<u>2HR-208</u>	$\frac{313}{17}$	(*)
NW Corner Near Load Center	<u>638-R13-313</u>	<u>2HR-210</u>	$\frac{313}{10}$	(*)
Corridor 580 NE Corner	<u>580-R14-283</u>	<u>2HR-216</u>	$\frac{283}{17}$	(*)
Corridor 580 SE Corner	<u>580-R18-283</u>	<u>2HR-215</u>	$\frac{283}{16}$	(*)
SLC Pump Area SW Corner	<u>574-R17-283</u>	<u>2HR-217</u>	$\frac{283}{14}$	(*)
NW Corner	<u>580-R13-283</u>	<u>2HR-218</u>	$\frac{283}{11}$	(*)
SE Corner Near CRD Maint. Room	<u>475-R18-253</u>	<u>2HR-223</u>	$\frac{253}{13}$	(*)

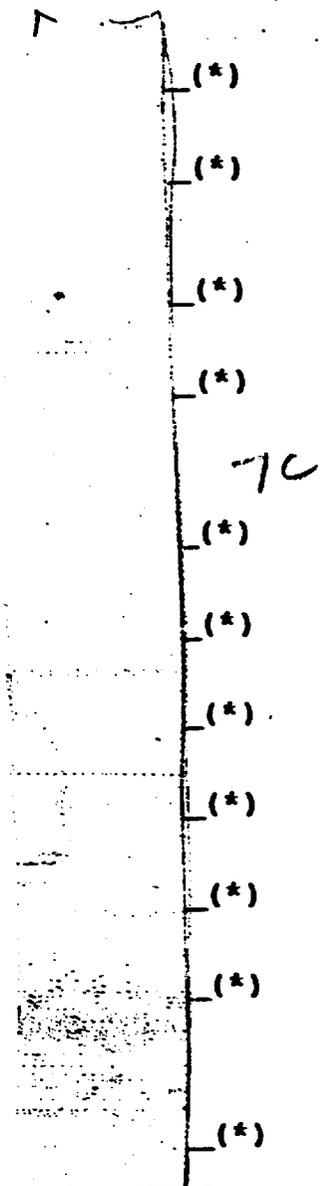
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FIRE HOSE STATION VISUAL INSPECTION

TABLE 3 - UNIT 2

<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Reactor Enclosure:</u>				
Box (Extra Hose) Near Hose Reel 2HR-223 (1) 100' Section	<u>475-R18-253</u>		$\frac{253}{13}$	(*)
NE Corner Near Stair No. 6	<u>475-R14-253</u>	<u>2HR-224</u>	$\frac{253}{15}$	(*)
W. Wall Near Unit 1/Unit 2 Airlock	<u>475-R17-253</u>	<u>2HR-225</u>	$\frac{253}{10}$	(*)
W. Wall Near Stair No. 2	<u>475-R13-253</u>	<u>2HR-226</u>	$\frac{253}{9}$	(*)
Box (Extra Hose) Near Hose Reel 2HR-226 (1) 100' Section	<u>475-R13-253</u>		$\frac{253}{9}$	(*)
NE Corner Next To Elevator	<u>370-R14-217</u>	<u>2HR-233</u>	$\frac{217}{44}$	(*)
SE Corner Near RCIC Equip. Hatch	<u>370-R18-217</u>	<u>2HR-232</u>	$\frac{217}{43}$	(*)
W. Wall Near Airlock 366	<u>370-R17-217</u>	<u>2HR-234</u>	$\frac{217}{40}$	(*)
NE Corner Near Stair No. 2	<u>370-R13-217</u>	<u>2HR-235</u>	$\frac{217}{39}$	(*)
SE Corner near Stair No. 5	<u>279-R18-201</u>	<u>2HR-240</u>	$\frac{201}{14}$	(*)
Box (Extra Hose) Near Hose Reel 2HR-240 (1) 100' Section	<u>279-R18-201</u>		$\frac{201}{12}$	(*)



FIRE HOSE STATION VISUAL INSPECTION

TABLE 3 - UNIT 2

<u>LOCATION</u>	<u>Room/Area/El.</u>	<u>Hose Rack No.</u>	<u>Station Number</u>	<u>Properly Equipped 6.3.1</u>
<u>Reactor Enclosure:</u>				
NE Corner Near Stair No. 6	<u>279-R14-201</u>	<u>2HR-241</u>	$\frac{201}{15}$	(*)
W. Wall Near RECW Hatch	<u>284-R17-201</u>	<u>2HR-242</u>	$\frac{201}{10}$	(*)
NW Corner Near RECW Pumps By Stairwell	<u>284-R13-201</u>	<u>2HR-243</u>	$\frac{201}{9}$	(*)
SE Corner Bottom of Stairwell	<u>178-R18-177</u>	<u>2HR-252</u>	$\frac{177}{11}$	(*) <i>TK</i>
NE Corner By Elevator	<u>186-R14-177</u>	<u>2HR-253</u>	$\frac{177}{13}$	(*)
NW Corner	<u>182-R13-177</u>	<u>2HR-236</u>	$\frac{177}{9}$	(*)

# EXHIBIT 7

Information in this record was deleted  
in accordance with the Freedom of Information  
Act, exemptions 7C  
FOIA- 99-76

55/119

W/O #R  
DATE/TIME 6-29-95/0930  
ACTOR JT  
RESULTS S SCF Y N  
DATE VERIFIED 6/2/95

*EJTC*

PHILADELPHIA ELECTRIC COMPANY  
MERRICK GENERATING STATION  
SURVEILLANCE TEST

ST-7-022-950-0 FIRE SUPPRESSION WATER SYSTEM (FSWS) SPRAY  
AND SPRINKLER VISUAL INSPECTION

Test Freq.: 18 Month -OR- Initiating Events: 1. Reason R0558548  
Tech. Spec.: 4.7.6.2.c.2 2. MRF No. \_\_\_\_\_  
4.7.6.2.c.3

TEST RESULTS:

A. All Asterisked(\*) Steps Completed SATISFACTORILY  
Performed By: (Sign/Date) [Redacted] 6/28/95  
Performed By: (Sign/Date) \_\_\_\_\_  
Informed Test Complete: (Sign/Date) [Redacted] 6/29/95  
(RO or CO) (Time) 0930  
Reviewed By: (SSVN or STA) (Sign/Date) [Redacted] 6/29/95  
10:00

B. One or More Asterisked(\*) Steps Test Results UNSATISFACTORY.  
Performed By: (Sign/Date) \_\_\_\_\_  
Informed of Test Results: (Sign/Date) \_\_\_\_\_  
(CO or RO) (Time) \_\_\_\_\_  
Shift Supervision: (Sign/Date) \_\_\_\_\_  
Corrective Action: MRF No.: \_\_\_\_\_  
Initiated By: (Sign/Date) \_\_\_\_\_  
IMMEDIATELY NOTIFY SENIOR PLANT STAFF MEMBER  
Person Notified: (Name) \_\_\_\_\_  
Date/Time Notified: (Date/Time) \_\_\_\_\_  
Notified By: (Sign) \_\_\_\_\_

ADDITIONAL ACTION/TEST COMMENTS:

If any entry is made in Additional Action/Test Comments section,  
person making initial entry sign here

(Sign/Date) \_\_\_\_\_

**1.0 PURPOSE**

To verify by visual inspection integrity of dry pipe spray/sprinkler headers  
AND unobstructed spray patterns of each sprinkler nozzle's spray area.

**2.0 REFERENCES**

- 2.1 M-22, P&ID - Fire Protection
- 2.2 LGS Fire Protection Evaluation Report
- 2.3 M-49-123, PR-58, Sprinkler Drawing
- 2.4 M-49-116, WP-75, Sprinkler Drawing
- 2.5 NFPA 13A, Inspection, Testing, and Maintenance of Sprinkler Systems

**3.0 TEST EQUIPMENT**

None

**4.0 PRECAUTIONS & LIMITATIONS**

- 4.1 IF a procedural step cannot be completed  
OR any other difficulty is encountered during this test,  
THEN make a comment in the Additional Action/Test Comments section.
- 4.2 IF a step denoted as a Tech. Spec. Requirement marked with an asterisk (\*) cannot be successfully completed,  
THEN notify Shift Supervision immediately.

**5.0 PREREQUISITES**

None

INITIALS

6.0 PROCEDURE

NOTE: It is the responsibility of the person or persons performing this test to ensure all blanks are correctly and completely filled in.

6.1 SHIFT NOTIFICATION

6.1.1 Notify Control Room Operator of start of inspection.



CO

6-25-81/19/3  
Date/Time

7C

NOTE: Sprinkler drawings listed in Section 2.0 should be used during sprinkler inspections.

6.2 For each sprinkler system listed in Table 1, verify integrity of dry pipe spray/sprinkler header by visual inspection for:

- 6.2.1 damaged/cracked piping
- 6.2.2 missing sprinkler heads
- 6.2.3 missing drain plugs
- 6.2.4 leaks

6.3 For each sprinkler system listed in Table 1, verify by visual inspection each sprinkler nozzle's spray pattern area is not obstructed.

7C

7.0 RETURN TO NORMAL

7.1 Inform CO test is complete.



8.0 ACCEPTANCE CRITERIA

8.1 See steps on Table 1 with asterisk(\*) .

INITIALS

NOTE: At test completion, ensure cover sheet is correctly and completely filled in.

NOTE: If any entry is made in this section, sign/date cover sheet under Additional Action/Test Comments.

ADDITIONAL ACTION/TEST COMMENTS: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

INITIALS

ESWS SPRAY AND SPRINKLER VISUAL INSPECTION

TABLE 1 (1 of 1)

<u>Sprinkler System No.</u>	<u>Descriptions</u>	<u>Locations</u>	<u>Integrity Verified (6.2)</u>	<u>Spray Pattern Area Unobstructed (6.3)</u>
WP-75 (*)	Cable Spreading, Room, Rms 449 & 450 Wet Sprinkler System (O,S,& Y Valve 1155)	449-A8-254  450-A8-254  Stair #7-254	[REDACTED] (*)	[REDACTED] (*)
PR-58	Control Structure Fan Room, Room 619, Pre-action Sprinkler System (O,S,& Y Valve 1156)	619-A8-304  Stair #7-304	[REDACTED] (*)	[REDACTED] (*)

7C

# EXHIBIT 11

Information in this record was deleted  
in accordance with the Freedom of Information  
Act, exemptions b7c  
FOIA- 99-76

5/3/20

INTERVIEW REPORT  
OF

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On Thursday, January 23, 1997, [redacted] Site Support Services, PECO, located at Limerick Generating Station (LGS), Sanatoga, Pennsylvania, was interviewed by Kristin L. Monroe, Special Agent, U.S. Nuclear Regulatory Commission (NRC), Office of Investigations (OI), Region I, King of Prussia, Pennsylvania, beginning at approximately 11:10 a.m. The interview took place at the PECO Security Office, LGS. [redacted] was interviewed regarding an irregularity in a portion of a surveillance test that was conducted by [redacted] in August 1995. [redacted] stated substantially as follows:

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[redacted] was born on [redacted]. His social security number is [redacted]. [redacted] resides at [redacted]. His home telephone number is [redacted]. [redacted] received an A.S. degree in Mechanical Engineering Technology from Pennsylvania State University in 1983, and a B.S. degree in General Engineering in May 1995, from Widener University. [redacted] has been employed by PECO since [redacted]. He has been the [redacted] since December 1995. [redacted] was the "unofficial" Fire Protection System Manager from May or June 1995 until December 1995.

7C

[redacted] was given the opportunity to review the statement that he provided to PECO security on August 20, 1996 (Attachment 1). [redacted] confirmed that he did provide the statement to PECO, and that it was accurate.

7C

The irregularity in the August 1995 surveillance test that [redacted] had conducted was identified via an investigation of [redacted] a member of [redacted] group. PECO had received an allegation that [redacted] had falsified a surveillance test in July 1995. As a result of that allegation, 18 months of surveillance tests were compared to 18 months of zone traces for the Fire Protection group.

7C

AGENT'S NOTE: [redacted] reviewed ST-7-022-952-0, "Fire Hose Station Refuel Inspection," and confirmed that was the surveillance test that had been identified as having an irregularity (Attachment 2). [redacted] reiterated how he conducted the surveillance test in August 1995. His testimony did not conflict with the testimony that he provided to PECO Security on August 20, 1996.

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Following his August 20, 1996, interview with PECO Security, [redacted] knew that there had to be an explanation for the fact that the zone trace did not reflect him in the protected area when he did the surveillance test. [redacted] started to remember problems that had he had encountered with [redacted] LGS, when they had done the surveillance test. [redacted] believed that he and [redacted] had performed the surveillance test on a weekend. [redacted] went to [redacted] LGS, and asked him to run a zone trace for two to three days prior to August 23, 1995. [redacted] explained to [redacted] that he thought that he and [redacted] LGS, had performed the surveillance test on a weekend, and the zone trace would show he was in the protected area on the weekend. [redacted] did the zone test and confirmed that [redacted] had been in

7C

Porter  
7C

the protected area on Saturday, August 19, 1995 (Attachment 3).

[REDACTED] advised that he and [REDACTED] had performed the LGS Unit 1 portion of the surveillance test, and that [REDACTED] Bechtel, LGS, had performed the LGS Unit 2 portion of the surveillance test. 7C

In response to questions from OI, [REDACTED] said that he made a mistake, but he did not "blatantly not perform the test." [REDACTED] did fail to immediately and properly document the date and time that he had called [REDACTED] LGS, to begin the surveillance test. [REDACTED] also failed to immediately and properly document on the surveillance test the date that he and [REDACTED] had done the test. [REDACTED] did not return to PECO Security and explain what happened, because he did not know if he was "allowed to." Had [REDACTED] known that he could have returned to PECO Security, he would have. Instead, he relied on [REDACTED] to explain to PECO Security what had happened. 7C

The interview was concluded on or about 12:30 p.m.

Reported by:

*Kristin L. Monroe*

Kristin L. Monroe, Special Agent  
Office of Investigations  
Field Office, Region I

Attachments:

1. A copy of [REDACTED] statement to PECO Security, dated August 20, 1996.
2. A copy of "SI-7-022-952-0, Fire Hose Station Refuel Inspection."
3. PECO Security zone trace for [REDACTED] dated October 22, 1996. 7C

*BEZ*  
Case No. 1-96-033

2

*Postcard*  
*7C*  
EXHIBIT 11  
PAGE 2 OF 20 PAGE(S)

7C

LINERICK GENERATING STATION

AUGUST 20, 1996

I, [REDACTED], make the following voluntary statement to [REDACTED] and [REDACTED], who have identified themselves to me as investigators of the Security Division, PECO Energy Company.

I was born on [REDACTED] in [REDACTED] and [REDACTED] and currently reside with my [REDACTED].

I was employed by PECO Energy (or [REDACTED]) on 2/18/86 and currently work as Fire Protection System Manager at LINERICK GENERATING STATION. My payroll number is [REDACTED].

ON THIS DATE I HAVE BEEN SHOWN A COPY OF SURVEILLANCE TEST S.T.-7-022-952-0 "FIRE HOSE STATION REFUEL INSPECTION" PERFORMED ON 8/22/95 AND 8/23/95 FOR WHICH I SIGNED AS "PERFORMED BY:" AND DATED 8/23/95 BY ME. THE S.T. CONTAINS SPECIFIC HOSE STATIONS WHICH I INITIALED AS HAVING INSPECTED ON THOSE DATES. MY INITIALS ARE CONTAINED ON PAGES 7, 8, 9 AND 10 OF HOSE STATIONS LOCATED IN THE UNIT ONE REACTOR BUILDING.

I HAVE BEEN SHOWN A COPY OF THE CARD HISTORY REPORTS WHICH SHOWS I WAS NOT IN THE PROTECTED AREA ON 8/22/95 AND NOT IN THE REACTOR BUILDING ON 8/23/95. I WAS NOT ON EITHER OF THOSE DATES, IN AREAS WHICH WOULD ALLOW ME TO INSPECT THE HOSE STATIONS I INITIALED AS INSPECTED.

I BELIEVE TWO POSSIBILITIES EXIST AS TO WHY

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THIS MAY HAVE OCCURRED.

I WAS NOT IN THE REASON BUENOS AIRES THE CARD HISTORY REPORTS BUT TOOK CREDIT FOR THE INSPECTION OF THE HORSES DONE BY [REDACTED] ON THOSE DATES. I MAY HAVE ASKED HIM WHAT THE RESULT WERE AS THE INSPECTION AND CONFERRED THE PORTION AS THE S.T. FOR THE HORSE INSPECTIONS IN QUIT QUIT. [REDACTED] AND INQUIRED THE INSPECTIONS ON QUIT TWO ON THE SAME S.T.

7C

7C

THE OTHER POSSIBILITY WOULD BE THE HORSE IN QUIT ONE WERE REPLACED SOMETIME IN THE RECENT PAST PERIOD

TO THE S.T. DATE AND I TOOK CREDIT FOR THE REPLACEMENT AND [REDACTED] AND INQUIRED THE S.T. ON THE DATE THE S.T. WAS RECORDED. I DID NOT NOTE ON THE ADDRESS FROM THE COMMENTS SHOWING CREDIT FOR THE FILE FROM [REDACTED]

7C

I DID NOT VISUALLY INSURE AS RECORDED, THE HORSE INSPECTIONS OR REPLACE THE HORSE ON THE DAYS THE S.T. WAS RECORDED.

I HAVE READ THE ABOVE STATEMENT CONSISTENT OF THIS AND ONE OTHER PAGE AND THE FACTS CONTAINED HEREIN ARE TRUE.

[REDACTED] 8/24/96

[REDACTED]

WITNESSES: [REDACTED] INVESTIGATOR, 8/24/96  
[REDACTED], [REDACTED] 8/20/96

7C

YMK  
R0569638

PHILADELPHIA ELECTRIC COMPANY DATE/TIME 8-23-95/1331  
LIMERICK GENERATING STATION ACTION BY CCF Y N  
SURVEILLANCE TEST RESULTS U

ST-7-022-952-0 FIRE HOSE STATION REFUEL INSPECTION DATE VERIFIED 8/28/95 BY UC

Test Freq.: 18 Month -OR- Initiating Events: 1. Reason  
Tech. Spec.: 4.7.6.5.b 2. MRF No. 7C

TEST RESULTS:

A. All Asterisked(\*) Steps Completed SATISFACTORILY. 7E  
Performed By: (Sign/Date) [Redacted] 8-23-95  
Performed By: (Sign/Date) [Redacted] 8-27-95  
Informed Test Complete: (Sign/Date) [Redacted] 8/23/95  
(CO or RO) (Time) 1331  
Reviewed By: (SSN or STA) (Sign/Date) [Redacted] 8/23/95

B. One or More Asterisked(\*) Steps Test Results UNSATISFACTORY.  
Performed By: (Sign/Date) \_\_\_\_\_  
Informed of Test Results: (Sign/Date) \_\_\_\_\_  
(CO or RO) (Time) \_\_\_\_\_  
Shift Supervision: (Sign/Date) \_\_\_\_\_  
Corrective Action: MRF No.: \_\_\_\_\_  
Initiated By: (Sign/Date) \_\_\_\_\_

IMMEDIATELY NOTIFY SENIOR PLANT STAFF MEMBER

Person Notified: (Name) \_\_\_\_\_  
Date/Time Notified: (Date/Time) \_\_\_\_\_  
Notified By: (Sign) \_\_\_\_\_

ADDITIONAL ACTION/TEST COMMENTS:

If any entry is made in Additional Action/Test Comments section, person making initial entry sign here.

(Sign/Date) [Redacted] 8/23/95

1.0 PURPOSE

To verify operability of fire hose stations by visual inspection of:

- a. hose station
- b. hose
- c. coupling gaskets
- d. nozzle/pistol grip

2.0 REFERENCES

- 2.1 N.F.P.A. 1962: Standard for the Care, Use, and Maintenance of Fire Hose Including Connections and Nozzles
- 2.2 LGS Fire Protection Evaluation Report
- 2.3 M-22, P&ID - Fire Protection

3.0 TEST EQUIPMENT

None

4.0 PRECAUTIONS & LIMITATIONS

- 4.1 IF a procedural step cannot be completed OR any other difficulty is encountered during this test, THEN make a comment in the Additional Action/Test Comments section.
- 4.2 IF a step denoted as a Tech. Spec. Requirement marked with an asterisk (\*) cannot be successfully completed, THEN notify Shift Supervision immediately.
- 4.3 Do not remove any fire protection equipment from its designated locations without replacing it with equivalent equipment.

4.4 Signoff steps marked SO in left-hand margin of body of procedure require a signoff on Tables 1,2,3.

5.0 PREREQUISITES

5.1 Obtain RWP (if required).

6.0 PROCEDURE

NOTE: It is the responsibility of the person or persons performing this test to ensure all blanks are correctly and completely filled in.

6.1 PREPARATION

6.1.1 Verify all prerequisites are satisfied.

INITIALS  
[REDACTED] 7C

6.2 SHIFT PERMISSION TO TEST

6.2.1 Obtain Shift Supervision's permission to start test.

6.2.2 Obtain Control Room Operator's permission to start test.

CO  
[REDACTED]

8/24/65 0730  
date/time

6.3 FIRE HOSE STATION REFUEL INSPECTION

SO 6.3.1 Verify designated station is equipped with fire hose AND nozzle/pistol grip.

a. Verify all components present AND free of damage.

- SO 6.3.2 Remove hose from reel  
AND lay out flat.
- a. Verify by visual inspection hose is free of:
- mildew
  - rot
  - abrasions
  - cuts
- SO 6.3.3 Examine all gaskets for:
- presence
  - fit
  - deterioration
- a. Replace gaskets found to be missing  
OR damaged  
AND note in Additional Action/Test Comments Section.
- SO 6.3.4 Verify hose is racked properly:
- a. no kinks/twists.
  - b. hose is tightly coupled to pipe.
  - c. nozzle/pistol grip is tightly coupled to hose.
- 6.3.5 Replace protective hose reel cover (if applicable).

7.0 RETURN TO NORMAL

- 7.1 Inform Shift Supervision  
AND Control Room Operator test is complete.

8.0 ACCEPTANCE CRITERIA

8.1 All steps on Tables 1, 2, 3 marked with asterisk (\*) are completed satisfactorily.

NOTE: At test completion, ensure cover sheet is correctly and completely filled in.

NOTE: If any entry is made in this section, sign/date cover sheet under Additional Action/Test Comments.

✓ ADDITIONAL ACTION/TEST COMMENTS: \_\_\_\_\_

*This is a valid partial to test all hoses which are not stamped with a hydrostatic inspection date of 9/92. All 9/92 stamped hoses will be removed and replaced with newly hydrostatic tested hose. Another partial will be performed to inspect the replaced hose. ST group schedule from this test. [redacted] [initials]*

- Note:
- ① There are no nozzle/pistol grips for hoses stored in the boxes.
  - ② Hoses in the boxes do not get installed on racks, connected to the pipe, or have nozzle/pistol grips connected.
  - ③ HOSES IN BOXES WILL BE REPLACED FOR HYDRO TESTING IN SEPT 95. THESE HOSES ARE NOT TECH SPEC.

FIRE HOSE STATION REFUEL INSPECTION

TABLE 1 - Unit 1

Hose Rack No.	Descriptions	Locations	Properly Equipped (6.3.1)	Hose Inspected (6.3.2)	Gaskets and Couplings, OK (6.3.3)	Properly Racked (6.3.4)
1HR-201	SW Corner Refuel Floor Fire Hose Station	700-R15-352	_____ (*)	_____ (*)	_____ (*)	_____ (*)
1HR-202	NW Corner Refuel Floor Fire Hose Station	700-R11-352	_____ (*)	_____ (*)	_____ (*)	_____ (*)
1HR-203	North Side Spent Fuel Pool Fire Hose Station	700-R12-352	_____ (*)	_____ (*)	_____ (*)	_____ (*)
1HR-204	South Side of Cask Wash down Area Fire Hose Station	700-R16-352	_____ (*)	_____ (*)	_____ (*)	_____ (*)
1HR-205	SW Corner RX Enclosure	613-R15-331	_____ (*)	_____ (*)	_____ (*)	_____ (*)
1HR-207	SW Corner Reactor Enclosure (RERS Fan Area) Fire Hose Station	605-R15-313	_____ (*)	_____ (*)	_____ (*)	_____ (*)
	Box (313-3) Near Hose Reel 1HR-207 100' of 1 1/2" hose	605-R15-313	_____	_____	_____	_____
1HR-208	NW Corner Reactor Enclosure (Laydown Area 601) Fire Hose Station	601-R11-313	_____ (*)	_____ (*)	_____ (*)	_____ (*)

FIRE HOSE STATION REFUEL INSPECTION

TABLE 1 - UNIT 1

Hose Rack No.	Descriptions	Locations	Properly Equipped (6.3.1)	Hose Inspected (6.3.2)	Gaskets and Couplings, OK (6.3.3)	Properly Racked (6.3.4)
1HR-209	SE Corner Reactor Enclosure (Near Refuel Floor Exhaust Fans) Fire Hose Station	605-R16-313	_____ (*)	_____ (*)	_____ (*)	_____ (*)
	Box (313-7) Near Hose Reel 1HR-209 100' of 1 1/2" hose	605-R16-313	_____	_____	_____	_____
1HR-210	NE Corner Reactor Enclosure (Near D124 Load Center) Fire Hose Station	602-R12-313	_____ (*)	_____ (*)	_____ (*)	_____ (*)
1HR-215	West Wall Reactor Enclosure (Corridor 506) Fire Hose Station	506-R15-283	_____ (*)	_____ (*)	_____ (*)	_____ (*)
1HR-216	NW Corner Reactor Enclosure (Corridor 506) Fire Hose Station	506-R11-283	_____ (*)	_____ (*)	_____ (*)	_____ (*)
1HR-217	SE Corner Reactor Enclosure (SLC Pump Area 500) Fire Hose Station	500-R16-283	_____ (*)	_____ (*)	_____ (*)	_____ (*)
1HR-218	NE Corner Reactor Enclosure Fire Hose Station	506-R12-283	_____ (*)	_____ (*)	_____ (*)	_____ (*)
1HR-223	West Wall Reactor Enclosure (Area 402A Near CRD Repair) Fire Hose Station	402A-R16-253	_____ (*)	_____ (*)	_____ (*)	_____ (*)

PAGE 11 OF 20 PAGE(S)  
 EXHIBIT 11

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FIRE HOSE STATION REFUEL INSPECTION

TABLE 1 - UNIT 1

Hose Rack No.	Descriptions	Locations	Properly Equipped (6.3.1)	Hose Inspected (6.3.2)	Gaskets and Couplings, OK (6.3.3)	Properly Racked (6.3.4)
1HR-224	NW Corner Reactor Enclosure (Near Drywell Equipment Hatch) Fire Hose Station	402-R11-253	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)
	Box (253-2) Near Hose Reel 1HR-224 100' of 1 1/2" hose	402-R11-253	①	[REDACTED]	[REDACTED]	②
1HR-225	SE Corner Reactor Enclosure (Near Drywell Personnel Lock) Fire Hose Station	402-R16-253	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)
	Box (253-6) Near Hose Reel 1HR-225 100' of 1 1/2" hose	402-R16-253	①	[REDACTED]	[REDACTED]	②
1HR-226	East Wall Reactor Enclosure (Near Tip Machines) Fire Hose Station	402-R12-253	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)
1HR-232	West Wall Reactor Enclosure (Near HPCI Equip. Hatch) Fire Hose Station	304-R15-217	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)
1HR-233	NW Corner Reactor Enclosure (Near Suppression Pool Access Hatch) Fire Hose Station	304-R11-217	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)
1HR-234	East Wall Reactor Enclosure (Near Equipment Airlock 300) Fire Hose Station	304-R16-217	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)
1HR-235	NE Corner Reactor Enclosure (Near MCC D124-R-G) Fire Hose Station	304-R12-217	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)

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FIRE HOSE STATION REFUEL INSPECTION

TABLE 1 - UNIT 1

Hose Reel No.	Descriptions	Locations	Properly Equipped (6.3.1)	Hose Inspected (6.3.2)	Gaskets and Couplings, OK (6.3.3)	Properly Racked (6.3.4)
<del>1HR-240</del>	<del>West Wall Reactor Enclosure (Near MCC D134-R-N) Fire Hose Station</del>	<del>200-R15-201</del>	<del>_____ (*)</del>	<del>_____ (*)</del>	<del>_____ (*)</del>	<del>_____ (*)</del>
	<del>Box (201-5) Near Hose Reel 1HR-240 100' of 1 1/2"</del>	<del>200-R15-201</del>	<del>_____</del>	<del>_____</del>	<del>_____</del>	<del>_____</del>
1HR-241	NW Corner Reactor Enclosure (Near MCC D134-R-M1) Fire Hose Station	200-R11-201	_____ (*)	_____ (*)	_____ (*)	_____ (*)
1HR-242	East Wall Reactor Enclosure (Near RECV Heat Exchangers) Fire Hose Station	207-R16-201	_____ (*)	_____ (*)	_____ (*)	_____ (*)
1HR-243	NE Corner Reactor Enclosure (Near RECV Pumps) Fire Hose Station	207-R12-201	_____ (*)	_____ (*)	_____ (*)	_____ (*)
1HR-142	NE Corner, Rx Encl. Fire Station	115-R12-177	_____ (*)	_____ (*)	_____ (*)	_____ (*)
1HR-252	SV Corner, Rx Encl. Fire Station	107-R15-177	_____ (*)	_____ (*)	_____ (*)	_____ (*)
1HR-253	NW Corner, Rx Encl. Fire Station	111-R11-177	_____ (*)	_____ (*)	_____ (*)	_____ (*)
<del>1HR-250</del>	<del>Stairwell, Outside RPS Static Inverter and Cable Spreading Room Fire Hose Station</del>	<del>402-A8-254</del>	<del>_____ (*)</del>	<del>_____ (*)</del>	<del>_____ (*)</del>	<del>_____ (*)</del>
1HR-251	Wall, Outside 4KV Switchgear & Battery Rooms Fire Hose Station	447-T3-239	_____ (*)	_____ (*)	_____ (*)	_____ (*)
	Box (239-13) Near Hose Reel 1HR-251 100' of 1 1/2" hose	447-T3-239	①	_____	_____	②

PAGE 13 OF 20 PAGE(S)  
 EXHIBIT 11

Handwritten marks: "20" and "11" with arrows pointing to rows 1HR-252 and 1HR-251 respectively.

FIRE HOSE STATION REFUEL INSPECTION

TABLE 1 - UNIT 1

Hose Reel No.	Descriptions	Locations	Properly Equipped (6.3.1)	Hose Inspected (6.3.2)	Gaskets and Couplings, OK (6.3.3)	Properly Racked (6.3.4)
1HR-124	Corridor 437, South Side of 4KV Switchgear & Battery Room Fire Hose Station	448-A8-239	(██████████) (**)	(██████████) (**)	(██████████) (**)	(██████████) (**)
	Box (239-18) Near Hose Reel 1HR-124 100' of 1 1/2" Hose	448-A8-239	(1)	(██████████)	(██████████)	(2)
1HR-116	Fire Hose Station Outside 13KV Supt Rm	338-17-217	(██████████) (**)	(██████████) (**)	(██████████) (**)	(██████████) (**)
1HR-121	Wall, Corridor 164, Fire Station	164-A8-180	(██████████) (**)	(██████████) (**)	(██████████) (**)	(██████████) (**)
1HR-120	Wall Near IC RFPT Lube Oil Reservoir Fire Hose Station	265-T7-200	(██████████) (**)	(██████████) (**)	(██████████) (**)	(██████████) (**)

*Handwritten mark resembling a stylized 'U' or 'V' with a loop.*

*Handwritten signature or initials.*

FIRE HOSE STATION REFUEL INSPECTION

TABLE 1 - UNIT 1

Hose Rack No.	Descriptions	Locations	Properly Equipped (6.3.1)	Hose Inspected (6.3.2)	Gaskets and Couplings, OK (6.3.3)	Properly Racked (6.3.4)
<del>2HR-201</del>	<del>SE Corner Refuel Floor Fire Hose Station</del>	<del>700-R18-352</del>	<del>_____ (*)</del>	<del>_____ (*)</del>	<del>_____ (*)</del>	<del>_____ (*)</del>
<del>2HR-202</del>	<del>NE Corner Refuel Floor Fire Hose Station</del>	<del>700-R14-352</del>	<del>_____ (*)</del>	<del>_____ (*)</del>	<del>_____ (*)</del>	<del>_____ (*)</del>
<del>2HR-203</del>	<del>North Side Spent Fuel Pool Fire Hose Station</del>	<del>700-R13-352</del>	<del>_____ (*)</del>	<del>_____ (*)</del>	<del>_____ (*)</del>	<del>_____ (*)</del>
<del>2HR-204</del>	<del>South Side Cast Washdown Area Fire Hose Station</del>	<del>700-R17-352</del>	<del>_____ (*)</del>	<del>_____ (*)</del>	<del>_____ (*)</del>	<del>_____ (*)</del>
2HR-205	SE Corner Rx Encl Fire Hose Station	652-R18-331	(██████████)	██████████ (*)	██████████ (*)	██████████ (*)
2HR-207	SE Corner Rx Encl (RERS Fan Area) Fire Hose Station	641-R18-313	(██████████)	██████████ (*)	██████████ (*)	██████████ (*)
	Box (313-16) Across From Hose Reel 2HR-207 100' of 1 1/2" hose	641-R18-313	(3)	(3)	(3)	(3)
2HR-208	NE Corner Rx Encl. (Laydown Area 638) Fire Hose Station	638-R14-313	(██████████)	██████████ (*)	██████████ (*)	██████████ (*)
2HR-209	SW Corner Rx Encl. (Near Refuel Floor Exh Fans) Fire Hose Station	641-R17-313	██████████ (*)	██████████ (*)	██████████ (*)	██████████ (*)
2HR-210	NW Corner Rx Encl. (Near LC) Fire Hose Station	638-R13-313	██████████ (*)	██████████ (*)	██████████ (*)	██████████ (*)
2HR-215	SE Corner Rx Encl. (Corr. 500) Fire Hose Station	580-R18-283	██████████ (*)	██████████ (*)	██████████ (*)	██████████ (*)

Handwritten notes: "N" and "C" written vertically on the right side of the table.

PAGE 15 OF 20 PAGES(S)  
 EXHIBIT 11  
 Return

FIRE HOSE STATION REFUEL INSPECTION

TABLE 2 - UNIT 2

Hose Reel No.	Descriptions	Locations	Properly Equipped (6.3.1)	Hose Inspected (6.3.2)	Gaskets and Couplings, OK (6.3.3)	Properly Racked (6.3.4)
2HR-216	NE Corner Rx Encl. (Corr. 580) Fire Hose Station	580-R14-283	[REDACTED] (**)	[REDACTED] (**)	[REDACTED] (**)	[REDACTED] (**)
2HR-217	SW Corner Rx Encl. (SLC PUMP Area 574) Fire Hose Station	574-R17-283	[REDACTED] (**)	[REDACTED] (**)	[REDACTED] (**)	[REDACTED] (**)
2HR-218	NW Corner Rx Encl. Fire Hose Station	580-R13-283	[REDACTED] (**)	[REDACTED] (**)	[REDACTED] (**)	[REDACTED] (**)
2HR-223	SE Corner Rx Encl. (Area 473 Near CRD Maint. Rm) Fire Hose Station	473-R18-253	[REDACTED] (**)	[REDACTED] (**)	[REDACTED] (**)	[REDACTED] (**)
	Box (253-13) Near Hose Reel 2HR-223 100' fo 1 1/2 Hose	473-R18-253	(3)	(3)	(3)	(3)
2HR-224	NE Corner Rx Encl. (Near Stair No. 6) Fire Hose Station	473-R14-253	[REDACTED] (**)	[REDACTED] (**)	[REDACTED] (**)	[REDACTED] (**)
2HR-225	West Wall Rx Encl. (Near Unit 1/Unit 2 Air lock) Fire Hose Station	473-R13-253	[REDACTED] (**)	[REDACTED] (**)	[REDACTED] (**)	[REDACTED] (**)
2HR-226	West Wall Rx Encl. (Near Stair No.2) Fire Hose Station	473-R13-253	[REDACTED] (**)	[REDACTED] (**)	[REDACTED] (**)	[REDACTED] (**)
	Box (253-9) Near Hose Reel 2HR-226 100' of 1 1/2 Hose	473-R13-253	(3)	(3)	(3)	(3)
2HR-232	SE Corner Rx Encl. (Near RCIC Equip. Hatch) Fire Hose Station	370-R18-217	[REDACTED] (**)	[REDACTED] (**)	[REDACTED] (**)	[REDACTED] (**)
2HR-233	NE Corner Rx Encl. (Near Supp. Pool Access Hatch) Fire Hose Station	370-R14-217	[REDACTED] (**)	[REDACTED] (**)	[REDACTED] (**)	[REDACTED] (**)

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*Partured*

FIRE HOSE STATION REFUEL INSPECTION

TABLE 2 - UNIT 2

Hose Rack No.	Descriptions	Locations	Properly Equipped (6.3.1)	Hose Inspected (6.3.2)	Gaskets and Couplings, OK (6.3.3)	Properly Racked (6.3.4)
2HR-234	West Wall Rx Encl. (Near Airlock 366 Fire Hose Station)	370-R17-217	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)
2HR-235	NE Corner Rx Encl. (Near Stair No. 2) Fire Hose Station	370-R13-217	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)
2HR-240	SE Corner Rx Encl. (Near Stair No. 5) Fire Hose Station	379-R18-201	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)
	Box (201-12) Across From Hose Reel 2HR-240 100' of 1 1/2" Hose	279-R18-201	(3)	(3)	(3)	(3)
2HR-24	1NE Corner Rx Encl. (Near Stair No. 6) Fire Hose Station	279-R14-201	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)
2HR-242	West Wall Rx Encl. (Near RECV MX) Fire Hose Station	284-R17-201	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)
2HR-243	NW Corner Rx Encl. (Near RECV Pumps) Fire Hose Station	284-R13-201	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)
2HR-252	SE Corner Rx Encl. Fire Hose Station	178-R18-177	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)
2HR-253	NE Corner Rx Encl. Fire Hose Station	186-R14-177	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)
2HR-236	NW Corner Rx Encl. Fire Hose Station	182-R13-177	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)
2HR-116	Outside 13KV Swgr. Rm. Fire Hose Station	346-T9-217	_____ (*)	_____ (*)	_____ (*)	_____ (*)
2HR-250	Unit 2 Static Inverter Rm. Fire Hose Station	453-A8-254	_____ (*)	_____ (*)	_____ (*)	_____ (*)
2HR-251	Wall outside 4KV Swgr. & Battery Rm. Fire Hose Station	465-T3-239	_____ (*)	_____ (*)	_____ (*)	_____ (*)

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FIRE HOSE STATION REFUEL INSPECTION

TABLE 2 - UNIT 2

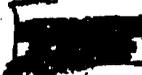
Hose Rack No.	Descriptions	Locations	Properly Equipped (6.3.1)	Hose Inspected (6.3.2)	Gaskets and Couplings, OK (6.3.3)	Properly Racked (6.3.4)
2HR-122	Corr. 466 South Side of 4KV Swgr & Battery Rms. Fire Hose Station	466-AB-239	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)
2HR-120	Wall Near 2A RFPT Lube Oil Reservoir Fire Hose Station	277-T9-200	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)
2HR-121	Wall, Corr. 166 Fire Hose Station	166-AB-180	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)	[REDACTED] (*)

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FIRE HOSE STATION REFUEL INSPECTION

TABLE 3 - Common

Hose Reel No.	Descriptions	Locations	Properly Equipped (6.3.1)	Hose Inspected (6.3.2)	Gaskets and Couplings, OK (6.3.3)	Properly Racked (6.3.4)
1HR-141	Stairwell Control Encl.	704-AB-330	(*)	(*)	(*)	(*)
1HR-140	Stairwell Outside SUTS Rm	625-AB-332	(*)	(*)	(*)	(*)
	Box (332-4) Near Hose Reel 1HR-140 100' of 1 1/2 in. hose	625-AB-332	①			②
1HR-103	Stairwell, Outside Fan Rm Fire Hose Station	619-AB-304	(*)	(*)	(*)	(*)
1HR-130	Stairwell Outside Aux. Equip. Rm. Fire Hose Station	519-AB-289	(*)	(*)	(*)	(*)

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# EXHIBIT 12

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Act, exemptions 7C  
FOIA- 99-74

5/7/24

INTERVIEW REPORT  
OF

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On Thursday, January 23, 1997,

[redacted] PECO, located at Limerick Generating Station (LGS), Sanatoga, Pennsylvania, was interviewed by Kristin L. Monroe, Special Agent, U.S. Nuclear Regulatory Commission (NRC), Office of Investigations (OI), Region I, King of Prussia, Pennsylvania, beginning at approximately 12:55 p.m. The interview took place at the PECO Security Office, LGS. [redacted] was interviewed regarding an irregularity in a portion of a Surveillance Test conducted by [redacted], Site Support Services, LGS, in August 1995. [redacted] stated substantially as follows:

7C

[redacted] was born on [redacted] His social security number is [redacted] resides at [redacted]. His home telephone number is [redacted]. [redacted] has a two year electrical degree from Pennsylvania State University and attended Wilkes-Barre College for three and a half years. [redacted] is currently studying for an Information Systems degree from the University of Phoenix "Online." [redacted] has been employed by PECO since approximately 1987.

7C

After [redacted] had been interviewed by PECO Security in August 1996, and told that he had not been in the protected area on the date that he signed the Surveillance Test, [redacted] tried to do his "own investigation." [redacted] said that there was "no way" that [redacted] would sign a Surveillance Test without having done the test, because that was "not the way we do work." Before [redacted] could finish his investigation, [redacted], LGS, and [redacted], PECO Security, determined that he and [redacted] had been in the protected area on August 19, 1995 (Exhibit 1), and [redacted] discontinued his investigation.

7C

The interview concluded on or about 1:30 p.m.

Reported by:

*Kristin L. Monroe*

Kristin L. Monroe, Special Agent  
Office of Investigations  
Field Office, Region I

Attachment:

- 1. PECO Security zone trace for [redacted] dated January 23, 1997.

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Case No. 1-96-033

















**PECO NUCLEAR**

**Memorandum**

**Location:** Limerick Generating Station  
Site Support Services Division  
Industrial Risk Management, SMB2-3

**Date:** August 14, 1996

**To:** File

**From:** [Redacted]

**Subject:** Fire Protection Section Issues

Information in this record was deleted  
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Act, exemptions 7C  
FOIA- 99-76

In late July, early August 1996, two members of the Fire Protection Section separately approached me about some team work and efficiency issues. [Redacted] indicated that [Redacted] one of the Technical Assistants, was not pulling his weight. This resulted in [Redacted] having to over function to meet commitments. [Redacted] on the other hand indicated that he was the only high performer and that other members on the team were not treating him professionally. 7C

I had previously noted that the Fire Protection Section appeared more reactive than proactive. As a result, I had directed [Redacted] to focus closely on the Fire Protection Section, while assigning [Redacted] collateral duties to work with the Safety professionals in IRM. The intent of this move was twofold: improve fire protection performance by management coaching and to provide cross-training for [Redacted].

Following the input from [Redacted] and [Redacted] I interviewed several people [Redacted] to get a better understanding of the issues. Based on all the information obtained, I believed a management intervention on my part was necessary. Therefore on August 7, 1996, I arranged for personal interviews with each of the five members of the fire protection team. Conducting the meetings with me were [Redacted] (5 of 5 meetings) and [Redacted] HR Generalist (3 of 5 meetings). 7C

In each of the interviews, we asked open ended questions to obtain data and evaluate issues within the group. I also specifically asked each member if they were aware of any NQA/NRC/Fire Protection/Safety issues. Each responded that they knew of none (see notes attached). However, comments made by [Redacted] (Bechtel [Redacted]) indicated that an ST (ST-7-022-951-0) performed by [Redacted] on July 29, 1996 appeared to have been completed faster than normally done. 7C

57/25

August 14, 1996

Page 2

Based upon this information, I directed [REDACTED] to obtain the completed ST and to review it against security door access records to verify that all required areas had been properly accessed. [REDACTED] completed his review on Monday, August 12, 1996, and beeped me with the findings. The findings indicated that [REDACTED] was not recorded as having entered several areas necessary to complete the ST. 7C

Upon receiving this information, I returned to LGS from Chesterbrook at about 1800 and walked some of the ST areas with George to confirm the findings. After confirming the findings, I notified [REDACTED]. I also directed [REDACTED] to suspend [REDACTED] badge. Later that night, I contacted [REDACTED] of NQA to get them involved in this issue. 7C

On August 13, 1996, [REDACTED] was interviewed [REDACTED] of Corporate Security about this issue. As of 1600, the interview was continuing. 7C

[REDACTED]

positions  
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# PECO NUCLEAR

## Memorandum

Location: Limerick Generating Station  
Site Support Services Division  
SMB2-4

Date: August 14, 1996

To: File

From: [REDACTED] 7C

Subject: Followup Memo On Fire Protection Section Issues

At approximately 1700 on April 13, 1996, I received a call from [REDACTED] Corporate Security, relative to his interview with [REDACTED]. [REDACTED] related that in the interview [REDACTED] confirmed that he had not gone to all the areas necessary to perform St-7-022-951-0, but had in fact signed the ST off as being complete. A signed statement attesting to these facts was obtained from [REDACTED] 7C

I joined [REDACTED] and [REDACTED] to continue the discussion at the PPC. From approximately 1730-2100, I discussed the event with [REDACTED]. He indicated that this was an isolated event. However, after further questioning, he remembered that he may not have done the same ST correctly the previous time as well. [REDACTED] also provide additional comments on work performed by the Fire Protection Section, which requires followup. Based on the information received, I suspended [REDACTED] without pay, pending investigation of the event. The suspension was based on the trustworthiness and reliability of [REDACTED] and to minimize additional risk to the Station and personnel. 7C

On August 14, 1996, I turned over my information from [REDACTED] and my notes from the Fire Protection team interview, to [REDACTED] of NQA to aid in [REDACTED] investigation. I also met with Neal Perry, NRC Senior Resident, to discuss the event. [REDACTED] was in attendance. [REDACTED] was directed by me to contact [REDACTED] to determine any reportability requirements. It was determined that this issue was not reportable. 7C

cc: W. G. MacFarland  
[REDACTED] 7C

Original to File

qpt-fp2

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Act, exemptions [REDACTED]  
FOIA- [REDACTED] 7C  
7/7/96

# Memorandum

Location: Linerick Generating Station  
Site Support Services Division  
Industrial Risk Management, SMB2-3

Date: August 21, 1996

To: File

From: [REDACTED] *7C*

Subject: Fire Protection Investigation

This memo documents and updates efforts in the ongoing investigation on surveillance test (ST) performance in the Fire Protection Section.

On August 20, 1996, at approximately 1720, I was notified by [REDACTED] NQA, that he and [REDACTED] Corporate Security, had identified some potential problems with an ST performed by [REDACTED]. [REDACTED] also indicated that [REDACTED] was being interviewed by [REDACTED] at that time to obtain a statement. *7C*

At approximately 1800, I directed [REDACTED], Industrial Risk Management to represent me at the interview as requested by [REDACTED], since I was in a meeting with the Vice President and Directors. Later that evening, [REDACTED] informed me by telephone of the interview results, which indicated that [REDACTED] may have inappropriately signed off the steps in the ST. Based on this data, I directed the Security Shift Supervisor [REDACTED] and notified [REDACTED] Security Manager, by urgent ASPEN since he was out-of-town on a business trip. *7C*

At 0810 in the morning on August 21, 1996, I met with [REDACTED] to review the data collected. Review of the data indicated that [REDACTED] Bechtel, also had a questionable ST sign-off for the 180' elevation. As a result of this new data, I directed [REDACTED] Acting Security Manager, at approximately 0930 [REDACTED] pending further investigation. *7C*

[REDACTED]

[REDACTED]

[REDACTED]

cc: W. G. MacFarland  
[REDACTED] *7C*

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in accordance with the Freedom of Information  
Act, exemptions *7C*  
FOIA- *99-76*

*3/21*

September 13, 1996

Mr. Jess H. Hinman  
Bechtel Environmental Safety and Health  
9801 Washington Boulevard  
Gaithersburg, MD 20878

Dear Mr. Hinman:

A recent investigation into the performance of Fire Protection Surveillance Tests at Limerick Generating Station has revealed that a Bechtel employee on contract with PECO Energy [redacted] failed to complete ST-7-022-952-0 as required by procedure. Specifically, Mr. [redacted] initialled a task as complete, but had not spent a sufficient amount of time in a particular plant area to complete the task required by the Surveillance Test.

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Mr. [redacted] failure to complete the Surveillance Test as required constitutes a violation of our contractual agreement and is a violation of our Nuclear Plant Rules that could impact the safe operation of our nuclear generating facility.

7C

I know you share our concern in this matter and trust that this information will enable you to take appropriate action with your employee.

Sincerely,

[redacted signature]

cc: W. G. MacFarland

7C

[redacted]  
file

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in accordance with the Freedom of Information  
Act, exemptions 7C  
FOIA 99-76

[redacted] 7C

Portions  
7C

DTM8

Based on a review of PIMS, there were 119 Fire Protection Group Surveillance Tests identified as being performed between 1/1/95 and 8/12/96. Of these, 48 were Fire Hydrant Inspections, Fire Brigade Drills, Fire Pump & Back-up Fire Pump Operability tests and were not considered for review. Of the remaining 71 tests, 51 (71.8%) were selected for review based on equipment location and personnel access within the power block.

This review was conducted by comparing the surveillance test's signoffs and security card reader zone traces for test performers and associated IVORs to ensure that the individuals were actually in the equipment area for a reasonable amount of time required to perform the function.

Satisfactory at the Result for each test means that the identified personnel were in the appropriate areas for a reasonable length of time to adequately perform the task.

Surveillance Test	Title	Date Completed	Performed By
ST-7-022-951-0 Rev.10 Result: satisfactory	Fire Hose Visual Inspection	1-27-95	
ST-7-022-951-0 Rev.10 Result: satisfactory	Fire Hose Visual Inspection	2-28-95	
ST-7-022-951-0 Rev.10 Result: no evidence of entry to the refuel floor	Fire Hose Visual Inspection	4-3-95	
ST-7-022-951-0 Rev.10 Result: satisfactory	Fire Hose Visual Inspection	5-8-95	
ST-7-022-951-0 Rev.10 Result: no evidence of entry to A8-304 (Fan Room) & A8-254 (Cable Spread Room)	Fire Hose Visual Inspection	6-8-95	
ST-7-022-951-0 Rev.10 Result: satisfactory	Fire Hose Visual Inspection	7/5-6/95	
ST-7-022-951-0 Rev.10 Result: satisfactory	Fire Hose Visual Inspection	8/4/95	
ST-7-022-951-0 Rev.10 Result: satisfactory	Fire Hose Visual Inspection	9/5/95	
ST-7-022-951-0 Rev.10 Result: satisfactory	Fire Hose Visual Inspection	10/6/95	
ST-7-022-951-0 Rev.10 Result: satisfactory	Fire Hose Visual Inspection	11/6/95	
ST-7-022-951-0 Rev.10 Result: satisfactory	Fire Hose Visual Inspection	12/5/95	
ST-7-022-951-0 Rev.10 Result: satisfactory	Fire Hose Visual Inspection	1/3/96	
ST-7-022-951-0 Rev.10 Result: satisfactory	Fire Hose Visual Inspection	2/1/96	

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5/5/96

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Surveillance Test	Title	Date Completed	Performed By
ST-7-022-951-0 Rev.10 Result:	Fire Hose Visual Inspection satisfactory	3/1/96	
ST-7-022-951-0 Rev.10 Result:	Fire Hose Visual Inspection satisfactory	4/1/96	
ST-7-022-951-0 Rev.10 Result	Fire Hose Visual Inspection 1) no evidence of entry to A8-200/180 2) no evidence of entry into Unit 1 Rx. Encl. although he accessed the refuel floor	4/30/96	
ST-7-022-951-0 Rev.10 Result:	Fire Hose Visual Inspection 1) completed refuel inspection in 2 mins. (8 hose stations) 2) completed Unit 1 Rx. Encl. in 3 mins. (29 hose stations)	5/29/96	
ST-7-022-951-0 Rev.10 Result	Fire Hose Visual Inspection satisfactory	6/27/96	
ST-7-022-952-0 Rev.6 Result	Fire Hose Station Refuel Inspection individual was not in the area (A8-201/180) for a reasonable amount of time to perform a hose inspection	8/23/95	
ST-7-022-953-0 Rev.6 Result:	Hose Cart Visual Inspection satisfactory	1/9/95	
ST-7-022-953-0 Rev.6 Result:	Hose Cart Visual Inspection satisfactory	2/9/95	
ST-7-022-953-0 Rev.6 Result:	Hose Cart Visual Inspection satisfactory	4/13/95	
ST-7-022-953-0 Rev.6 Result:	Hose Cart Visual Inspection satisfactory	5/16/95	
ST-7-022-953-0 Rev.6 Result:	Hose Cart Visual Inspection satisfactory	7/20/95	
ST-7-022-953-0 Rev.6 Result:	Hose Cart Visual Inspection satisfactory	8/18/95	
ST-7-022-953-0 Rev.6 Result:	Hose Cart Visual Inspection satisfactory	9/18/95	
ST-7-022-953-0 Rev.6 Result:	Hose Cart Visual Inspection satisfactory	4/16/96	
ST-7-022-953-0 Rev.6 Result:	Hose Cart Visual Inspection satisfactory	5/15/96	
ST-7-022-353-0 Rev.4 Result:	Halon System Inventory satisfactory	3/5/96	

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<b>Surveillance Test</b>	<b>Title</b>	<b>Date Completed</b>	<b>Performed By</b>
ST-7-022-353-0 Rev.4 <i>Result:</i> satisfactory	Halon System Inventory	7/31/95	
ST-7-022-353-1 Rev.4 <i>Result:</i> satisfactory	Halon System Inventory (IVOR personnel initials are not identifiable)	7/15/96	
ST-7-022-353-1 Rev.3 <i>Result:</i> satisfactory	Halon System Inventory	3/5/96	
ST-7-022-353-1 Rev.3 <i>Result:</i> satisfactory	Halon System Inventory	7/31/95	
ST-7-022-353-2 Rev.4 <i>Result:</i> satisfactory	Halon System Inventory	3/2/96	
ST-7-022-353-2 Rev.4 <i>Result:</i> satisfactory	Halon System Inventory	2/4/96	
ST-7-022-353-2 Rev.4 <i>Result:</i> satisfactory	Halon System Inventory	3/7/96	
ST-7-022-353-2 Rev.4 <i>Result:</i> satisfactory	Halon System Inventory	7/31/95	
ST-7-022-950-0 Rev.4 <i>Result:</i> no evidence of access to rooms 449, 450, 619 (cable spread room or fan room)	Fire Suppression Water System (FSWS) Spray and Sprinkler Visual Inspection	6/28/95	
ST-7-022-950-1 Rev.0 <i>Result:</i> satisfactory	Fire Suppression Water System (FSWS) Spray and Sprinkler Visual Inspection	6/9/95	
ST-7-022-950-2 Rev.1 <i>Result:</i> satisfactory	Fire Suppression Water System (FSWS) Spray and Sprinkler Visual Inspection	11/2/95	
ST-7-022-921-1 Rev.3 <i>Result:</i> satisfactory	Fire Damper Inspection	2/26/96	

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Portner  
7C

<u>Surveillance Test</u>	<u>Title</u>	<u>Date Completed</u>	<u>Performed By</u>
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ST-7-022-921-0 Rev.4 Result: satisfactory	Fire Damper Inspection	8/7/96	
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Work Process/Implementation:

- damper 017-001 on page 9, IVOR step was not signed off as being performed during walkdown of FPDs in A8-239; identified incorrect room numbers listed on COL and no identification labeling on the FPD to ensure accurate identification (all are identified with black marker)

ST-7-022-921-2 Rev.0 Result: satisfactory	Fire Damper Inspection	2/8/95	
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ST-7-022-323-2 Rev 4 Result: satisfactory	Halon System Operability Verification	1/29/95	
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ST-7-022-323-1 Rev.3 Result: satisfactory	Halon System Operability Verification	2/7/96	
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Work Process/Implementation:

- The same person signed off as the Test Performer and the Management Reviewer

ST-7-022-323-0 Rev.5 Result: satisfactory	Halon System Operability Verification	2/7/96	
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Work Process/Implementation:

- The same person signed off as the Test Performer and the Management Reviewer

ST-7-022-250-0 Rev 3 Result: satisfactory	FSWS Flow Test	6/12/95	
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RT-7-022-730-2 Rev.3 Result: satisfactory	BQP FSWS Air/Water Nozzle Flow Test	2/16/95	
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ST-7-022-730-0 Rev.3 Result: satisfactory	FSWS Air/Water Nozzle Flow Test	8/29/95	
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Work Process/Implementation:

- Suggest performing a step by step review and verification of the above three tests to ensure accuracy (i.e., panel/valve/room numbers and locations) and adequacy.

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Antony  
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<u>Surveillance Test</u>	<u>Title</u>	<u>Date Completed</u>	<u>Performed By</u>
ST-7-022-922-2 Rev 4	Fire Rated Penetration Test Sample Visual Inspection	2/2/95	
<i>Result:</i>	satisfactory		
ST-7-022-922-0 Rev.5	Fire Rated Penetration Test Sample Visual Inspection	2/27/96	
<i>Result:</i>	satisfactory		

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**General work process/implementation note:**

Based on the ST reviews and zone trace comparisons, the majority of IVOR's required were performed by personnel entering and exiting an area/room at the same time as the performer. This raises a question on the integrity of the true independence of the IVOR performance. An Independent Verification (IV) is verification by a second qualified individual operating independently after the activity to verify that a specific condition exists. (See the Operations Manual Chapter OM-C-11.1 for IV guidelines and methods or reference A-C-33). Reinforcement of Management expectations on performance of IVORs should be communicated to all Fire Protection Group personnel to ensure conformance or pursue appropriateness of revising tests to Double Verifications (DV).

Rev.4 (9/9/96)

POTENTIAL  
7C

Evaluation & Review of the following concerns was performed by:

[Redacted] LQD - Assessor  
[Redacted] PBAPS - Fire Protection [Redacted]

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**Concern #1 - Fire System Impairments (FSI) are in the reviewed stage not taken to complete. Also were they properly compensated?**

**Review Results -** 23 of the 89 Fire System Impairments (FSIs) identified in March 1996 by IRM personnel were reviewed to determine if the required compensatory actions were taken. The FSIs found in the "REVWD" status can be placed into one of the following three categories: 1) Preventive maintenance activities deactivated and not performed 2) More than one work order activity required the same component removed from service at the same time and the duplicate FSI was not used 3) FSI implemented by Site Management and not taken to "INPROG" status.

The preventive maintenance activities that are in the "DEACT" status are activities that have been removed from the PM program. The work described in these work orders have not been performed and no impairment of a fire system was made.

In several cases multiple activities of the same work order would impair the same fire protection feature. A review of the completion remarks for the work order and a review of other FSIs created under that work order showed that shift management had reviewed the release of the fire protection feature and compensatory measures were in place. In all cases reviewed, a properly filled out FSI in the "COMPLT" status could be found in PIMS.

A report of FSIs in the "REVWD" status was obtained from maintenance planning. The report contained the shift supervision PIMS sign-offs when performed. A review of the report identified 22 FSIs in the "REVWD" status in which at least the shift supervision sign off was completed. Some of these FSIs had all initial locations completed indicating that the impairment had occurred and the system was returned to service without placing the FSI in the proper status. When the FSI is left in the "REVWD" status shift supervision would not review the impairment when determining compensatory actions for new impairments. Since this could lead to the improper compensatory actions being prescribed, the Manager-IRM generated PEP 10006009 to capture the issue.

The current FSI program provides the individual completing the work order activity with a message to close the FSI and requires that the enter key be pressed a second time. AG-CG-12.1 provides direction to the implementing organization to status the FSI as complete when the fire protection feature is returned to an operable status. The issue of timely FSI closure has been identified as a watch area in the Industrial Risk Management group self assessment.

**Conclusion -** Fire System Impairments (FSI) were identified to be in the reviewed stage and not taken to complete. In our opinion this condition has no safety significance. Computer programming enhancements should be made to assure FSIs are taken to the INPROG status prior to being worked and to assure FSIs are closed out when jobs are completed. Based upon PIMs review FSIs were identified to have been properly compensated.

**Concern #2** - Not all sections of fire rated assemblies were being inspected such as carpeted areas or areas blocked by installed plant equipment.

**Review Results** - The TRM surveillance requirements section 4.7.7.1 (a) states that the exposed surfaces of each fire rated assembly shall be verified operable by performing a visual inspection once per 24 months. ST-7-022-920-0 is utilized to perform the visual inspection of the fire rated assemblies as required by the TRM. On August 22, 1996 IRM individuals familiar with the performance of the inspection were asked to describe their visual inspection technique. The test is performed by inspecting the visible sections of the fire rated assembly from the floor using flashlights and binoculars. Any permanent plant equipment, including carpeting, in the way of inspecting that section of the barrier are not removed for the inspection. Fire protection personnel from two plants in region I were contacted to discuss how they handle similar inspections. The LGS method of performing the inspection is consistent with other plants and is deemed to provide assurance that the barrier is intact.

The May 16, 1996 performance of ST-7-022-920-1 was performed for structural walls but section 6.2.3 inspection of fire rated raceways was not performed. The reason for not performing this section was that thermo-lag fire barriers were declared inoperable and compensatory actions were in place. The performance of this procedure should have been listed as a partial per A-3, "Temporary changes to approved procedures and partial procedure use". The use of this process ensures that only partial credit is given for the performed section of the procedures and the appropriate partial work order generated to track the completion of the procedure.

**Conclusion** - Fire rated assemblies that are not "exposed" are not required to be inspected.

**Concern #3** - ST-7-022-730-1 (FSWS Air/Water Nozzle Flow Test) if performed as written it will dump the system.

**Review Results** - ST-7-022-730-1 has been written to satisfy the surveillance requirements of TRM 4.7.6.2 (d) to perform an air flow test which would verify that each sprinkler header system or open spray nozzle is unobstructed. There were two types of systems tested by ST-7-022-730-1 preaction systems which incorporate the use of closed sprinkler heads and the integrity of the piping is supervised using air pressure. The air is supplied from the plant air system through a regulator. When testing this type of system the high/low air pressure alarm is tested for both the high and low alarm points. The high pressure alarm is obtained by raising the system air pressure to a nominal 80 psig and verifying the alarm on the local release control panel. Low air pressure is then verified by opening the inspectors test valve to bleed off air pressure to the low alarm point while verifying airflow through the sprinkler header. This type inspection would verify that a flow path existed from the preaction valve to the inspectors test connection.

The other type of system tested are deluge water spray systems that incorporate the use of open spray nozzles. Two types of deluge valves are used in the design of the systems at LGS. Smaller systems used small hydraulically operated deluge valves that use fire system pressure to maintain the valve in the closed position. When testing these systems the outer block valves for the systems are closed and the alarm pressure switch is isolated from these systems. These actions would prevent the system from performing its design function. There are no plant impact statements in the test to warn shift supervision of the

change in status of the system or ensure that compensatory actions are maintained. The Manager - IRM has initiated I006033 to investigate plant impact of fire system tests.

Airflow is established for deluge system by routing air from a plant air hose outlet to the system drain or ball check valve. Once airflow is established airflow can be verified at the nozzles. The test prescribes three methods that can be used to check for airflow. Each of these methods require the tester to physically access the spray nozzles. Through discussions with IRM personnel it was determined that a pinwheel on a stick was used in determining airflow, which was not specifically described in the procedure. The use of a pinwheel would be equivalent to the three methods listed in the procedure.

While performing the walkdown of the test identifying all of the sprinkler heads without knowing the total number of heads installed in the area or the use of a design print was extremely difficult. To ensure accurate performance of the test specific guidance on identifying the heads should be given to the performer.

The description of alarms received on local panels and control room panels did not provide coordinate locations that would provide verification that the proper alarm window or panel light has activated. In the case of alarms on release control panel it could not be determined which light the test performer would expect to light during the test. A-C-1 APP.2 EXH.11 should be referenced for describing information in surveillance tests.

**Conclusion - ST-7-022-730-1 (FSWS Air/Water Nozzle Flow Test) if performed as written will not dump the system. Plant impact statements should be included in the test to warn shift supervision of the change in status of the system and ensure that compensatory actions are maintained.**

**Concern #4 - Penetration seal surveillance test references incorrect drawings.**

**Review Results - Reviewed ST-7-022-922-2 rev. 5 attachment #1 "Penetration Inspection Data Sheet" requires a listing of penetration seal detail drawing numbers. Based upon review of the ST completed 2/27/96, seal area drawings were referenced instead of seal detail drawing numbers. The surveillance test contains inspection criteria to verify that damage has not occurred to the penetration seal. Concern was noted that if the seal installation detail is not reviewed by the test performer critical design parameters may be missing from the installation. The seal inspection test should ensure that degradation to the penetration seals have not occurred and that the visible seal parameters meet the tested configuration.**

**Conclusion - The penetration seal inspection procedure was performed as written in February 1996. In our opinion the test performed meets the intent of the Technical Requirement Manual (TRM). The test did not provide clear direction to use installation design details. The test does provide acceptance criteria that will identify physical damage to the penetration seals. We believe the test can be improved by ensuring that the test performer completely understands the visual parameters that are important to ensure the seal is bounded by a fire test. While addressing this issue SECY 96-146 should be referenced.**

**Concern #5 - Emergency Lighting - A procedure was not developed to direct lights toward emergency equipment.**

Review Results - RT-6-108-300-2 rev.3, RT-6-022-108-300-0 rev. 4 and RT-6-108-300-1 rev.4 (Safe Shutdown Eight (8) Hour Self-Contained Battery Pack Operation Verification) all require the performer to verify that emergency lighting is directed towards required equipment for safe shutdown and access pathways. A walkdown was performed using RT-6-108-300-2 which was last performed by operations on July 30, 1996. During the walkdown the aiming of 24 emergency lighting units were evaluated. All lights were observed to be aimed in the area of the equipment identified in the procedure. When trying to assess the lighting in stairtowers and some general area lighting the test did not provide enough direction to accurately determine the proper aiming. This issue was discussed with IRM personnel who were aware of the need to better identify the appendix R lighting and produced an AT AITL type A/R A01034738 written in June of this year requesting engineering to identify the require safe shutdown lighting. The response to the A/R indicates that a revision to the test procedures and possibly plant drawings will be required.

Conclusion - In our opinion, procedural guidance is in place to require verification that emergency lighting is directed towards appendix R safe shutdown pathways and equipment.