

10CFR50.73

June 12, 2008

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Limerick Generating Station, Unit 2
Facility Operating License No. NPF-85
NRC Docket No. 50-353

Subject: LER 2008-003-00, Condition Prohibited By Technical
Specifications Due To Inoperable Radiation Monitor

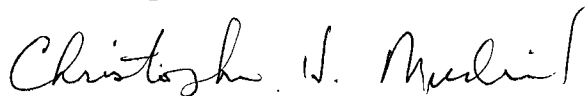
This Licensee Event Report (LER) addresses an event that
resulted in a condition prohibited by Technical Specifications
due to an inoperable process radiation monitor on the reactor
enclosure cooling water system.

This LER is being submitted pursuant to the requirements of
10CFR50.73(a)(2)(i)(B).

There are no commitments contained in this letter.

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

Sincerely,



Christopher H. Mudrick
Vice President - Limerick Generating Station
Exelon Generation Company, LLC

cc: S. J. Collins, Administrator Region I, USNRC
E. M. DiPaolo, USNRC Senior Resident Inspector, LGS

FE22
NRRC

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Records and FOIA/Privacy Service Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

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4. TITLE:
Condition Prohibited By Technical Specifications Due To Inoperable Radiation Monitor

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
04	15	2008	2008	003	00	06	12	2008		05000
									FACILITY NAME	DOCKET NUMBER
										05000

9. OPERATING MODE 1	11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)										
	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(i)(C)	<input type="checkbox"/> 50.73(a)(2)(vii)							
10. POWER LEVEL 100	<input type="checkbox"/> 20.2201(d)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)							
	<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(ii)(B)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)							
	<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 50.36(c)(1)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)(A)							
	<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 50.36(c)(1)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(iv)(A)	<input type="checkbox"/> 50.73(a)(2)(x)							
	<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(v)(A)	<input type="checkbox"/> 73.71(a)(4)							
	<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.46(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(v)(B)	<input type="checkbox"/> 73.71(a)(5)							
<input type="checkbox"/> 20.2203(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(C)	<input type="checkbox"/> OTHER								
<input type="checkbox"/> 20.2203(a)(2)(vi)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)(B)	<input type="checkbox"/> 50.73(a)(2)(v)(D)	Specify in Abstract below or in NRC Form 366A								

12. LICENSEE CONTACT FOR THIS LER

NAME Robert E. Kreider, Manager – Regulatory Assurance	TELEPHONE NUMBER (Include Area Code) 610-718-3400
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13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT

CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX

14. SUPPLEMENTAL REPORT EXPECTED <input type="checkbox"/> YES (If yes, complete 15. EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO	15. EXPECTED SUBMISSION DATE	MONTH	DAY	YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)

The Hi-Hi radiation alarm setpoint for the process radiation monitor on the reactor enclosure cooling water system was discovered to be exceeding the Technical Specification allowable value by the surveillance test coordinator during a review of completed surveillance test documentation. The required grab samples were not collected during the affected period. The condition was caused by a less than adequate self-check by the technician recording the as found data during the functional test surveillance. In addition the peer check and supervisory review of the test data were less than adequate. A work group stand-down was performed to reinforce the consequences of not applying the barriers that are designed for error prevention. All Instrument and Control (I&C) work group surveillance test performers perform an independent verification and initial each surveillance test data table. I&C supervisors review and initial each surveillance test data table. I&C surveillance test reviewer training will be performed to reinforce the critical risk elements of reviewing surveillance tests.

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NARRATIVE (If more space is required, use additional copies of NRC Form 366A) (17)

Unit Conditions Prior to the Event

Unit 2 was in Operational Condition (OPCON) 1 (Power Operation) at approximately 100% power. There were no structures, systems or components out of service that contributed to this event.

Description of the Event

On Tuesday April 15, 2008, Limerick Unit 2 was operating at approximately 100% power and the surveillance test coordinator (STC) was performing a review of a completed functional test on the reactor enclosure cooling water radiation monitoring system (RECW-RMS) (EIIS:CC) (EIIS:IL). The STC identified that the "as left" alarm (EIIS:RA) setpoint was documented as 1100 counts per minute (CPM), which was greater than the test "required limit" of 1050 CPM. The STC informed Operations shift management that the radiation monitor was potentially inoperable due to the documented test data. An investigation determined that the test data was accurate and the radiation monitor was inoperable. Operations shift management declared the radiation monitor inoperable at approximately 1210 hours and directed obtaining a grab sample every 24 hours.

An investigation determined that the radiation monitor was rendered inoperable on March 24, 2008, during the last performance of the functional test when the technician failed to recalibrate the alarm setpoint as required by the test. The radiation monitor was restored to operable status on April 16, 2008, at 1030 hours, following successful performance of the functional test. The radiation monitor was inoperable for approximately 23 days.

Technical Specification (TS) 3.3.7.1 requires one operable RECW radiation monitor channel "at all times." With the radiation monitor inoperable, Table 3.3.7.1-1 Action 72 applies. Action 72 requires obtaining and analyzing RECW grab samples every 24 hours. The required grab samples were not collected until the radiation monitor was discovered to be

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inoperable following the STC identification of the test performance error.

This event resulted in a condition prohibited by Technical Specifications. Therefore, this LER is being submitted pursuant to the requirements of 10CFR50.73(a)(2)(i)(B).

Analysis of the Event

There were no actual safety consequences associated with this event. The potential safety consequences of this event were minimal. The RECW-RMS Hi-Hi alarm setpoint was not within the required range but the Hi alarm setpoint was functional and would have alerted Operations of an increase in RECW radiation levels during the affected period. In addition, the RECW-RMS count rate was continuously indicated and recorded in the control room and was monitored during routine control panel walkdowns. The service water radiation monitor remained operable during the affected period.

The TS bases state that the instrument ensures that radiation levels are continually measured, the alarm is initiated when the radiation level trip setpoint is exceeded, and sufficient information is available on the plant parameter to monitor and assess the variable following an accident.

The RECW-RMS is designed to detect leakage from contaminated systems into the RECW system, which provides a barrier to release to the environment. Service water provides the cooling medium for the RECW heat exchanger and is also designed with a process radiation monitor.

The RECW-RMS is described in Limerick UFSAR, Sections 7.7.9.12 and 11.5.2.2.13. The system is classified as a non-safety related process radiation monitoring system (PRMS). The system provides an upscale/downscale trip signal to an annunciator in the control room. The system provides no control trip function. Radiation data is continuously recorded in the control room.

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Cause of the Event

The condition was caused by a less than adequate self check by the technician recording the as found data during the functional test surveillance. In addition, the peer check and supervisory review of the test data was less than adequate.

Corrective Action Completed

A work group stand-down was performed to reinforce the consequences of not applying the barriers that are designed for error prevention.

All Instrument and Control (I&C) work group surveillance test performers perform an independent verification and initial each surveillance test data table. I&C supervisors review and initial each surveillance test data table.

Corrective Action Planned

I&C surveillance test reviewer training will be performed to reinforce the critical risk elements of reviewing surveillance tests.

Previous Similar Occurrences

There were no previous similar occurrences of reportable inoperability of TS equipment due to a surveillance test error in the past three years.

Component data:

Component description: Reactor Enclosure Cooling Water
Radiation Monitor
Component number: RISH-013-2K606
Manufacturer: G080 General Electric Company
Model number: 145C3284AAG001

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NARRATIVE (If more space is required, use additional copies of NRC Form 366A) (17)

References:

ST-2-013-600-2 Radiation Monitoring - Reactor Enclosure
Cooling Water System Monitor Functional Test (RISH-13-2K606)