

APPENDIX A  
NOTICES OF VIOLATION

Philadelphia Electric Company  
Limerick Generating Station  
Units 1 and 2

Docket No. 50-352 and 50-353  
License No. NPF-39 and NPF-85

During an NRC inspection conducted on May 25, 1993 through July 6, 1993, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. Technical Specification (TS), Section 6.8.1, states, in part, written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, recommends the establishment of administrative procedures including procedures covering equipment control.

Administrative Procedure A-41.1, Revision 13, Troubleshooting Plant Equipment, Step 7.3.1, written to comply with TS 6.8.1, states, in part, after troubleshooting is complete, the worker shall:

1. Document all system configuration changes listed in the TCF [Troubleshooting Control Form] or return them to the as found position, unless otherwise directed by Shift Supervision.
2. Apply the proper administrative controls and document them on the TCF as appropriate (i.e., ETT [Equipment Trouble Tag], Work Order, A/R [Action Request], or TCA [Temporary Circuit Alteration]).

Contrary to the above, on April 13, 1993, while performing troubleshooting activities on Drywell Chilled Water valve HV-87-120A, to determine why the valve failed to properly stroke during post maintenance testing, maintenance, operations and technical personnel identified that the physical configuration of the breaker side thermal overload relay wires in the valve's 480 volt circuit breaker (D11-R-C-13) were reversed. In order to correct the wiring deficiency, two wires on the motor side of the thermal overload relay were swapped, changing the system configuration, and plant personnel did not document this change in a TCF, nor were any other administrative controls applied to document this wiring change, and they were not otherwise directed by Shift Supervision.

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

- B. 10 CFR 50.54(q) requires that a licensee authorized to possess and operate a nuclear power reactor shall follow and maintain in effect emergency plans which meet the standards in 50.47(b) and the requirements in Appendix E of this part.

10 CFR 50.47(b)(8) requires that adequate emergency facilities and equipment to support the emergency response are provided and maintained.

Section 7.2.2 of the Limerick Generating Station Emergency Plan states that the first backup for the Technical Support Center (TSC) offsite power supplies is a 15 minute Uninterruptible Power Supply (UPS), to maintain the communication system during a total station blackout. Section 8.4 of the Emergency Plan states, in part, that any deficiencies identified during performance of surveillances are corrected to ensure operation and readiness of emergency equipment.

Contrary to the above, on July 12, 1992, following a surveillance test failure, the TSC UPS battery was declared inoperable, and no actions were taken to correct the deficiencies until May 18, 1993. Additionally, following an unsatisfactory performance of the surveillance test in November 1991, an action request (A/R) was generated to investigate the feasibility of performing single cell charging to correct deficiencies identified through surveillance test failures. No corrective actions were processed in response to the A/R.

This is a Severity Level IV Violation (Supplement VIII).

Dated at King of Prussia, Pennsylvania

this 23rd day of July, 1993