

APPENDIX A

NOTICE OF VIOLATION

PECO Energy
Limerick Nuclear Generating Station
Units 1 and 2

Docket Nos. 50-352, 50-353
License Nos. NPR-39, NPR-85

During an NRC inspection conducted on November 29 - December 3, 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:

Technical Specification 6.11 requires adherence to radiation protection procedures.

1. Radiation Protection Procedure A-C-107, Revision 1, Radiation Work Permit Program and Radiological Controlled Area Access, states, in part, in Section 5.0 that all workers are responsible for complying with established postings in the radiological controlled area (RCA). Further, Section 7.6 of the same procedure states that personnel requiring access on a radiation work permit (RWP) shall proceed to the Access Control Building/Health Physics Field Office and inform Health Physics of the activity to be performed in the RCA.

Contrary to the above, on November 19, 1993, the doors (No. 199 and 190) to Room 309 in the Unit 1 reactor building were posted at 11:00 a.m. to read "High Radiation Area-RWP Required," and three firewatches made separate unauthorized entries into the room at 11:35 a.m., 12:35 p.m., and 1:35 p.m., respectively, that day and did not comply with the posting. Specifically, the individuals did not obtain the required RWP. Further, the individuals did not inform Health Physics of the activity to be performed.

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

2. Procedure A-C-107, Revision 0, states, in part, in Section 7.7.4 that the RWP compliance sheet be signed by the worker to indicate that they have read, understood, and will comply with the RWP requirements.

Contrary to the above, on November 29, 1993, at 3:30 p.m. a radiological controls technician, suited in protective clothing and performing on-going surveys for fuel inspection activities, was not properly signed in on the applicable radiation work permit (No. 93-0035, Revision 3, Perform Fuel Inspection Activities and Unpacking in the Spent Fuel Pool) for the activity. Specifically, the technician had not signed the "compliance sheet" for the permit.

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

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Pursuant to the provisions of 10 CFR 2.201, Philadelphia Electric Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region I, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at King of Prussia, PA
this 21st of January, 1994

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