

## NOTICE OF VIOLATION

PECo Energy  
Limerick Generating Station, Units 1 and 2

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

During NRC inspection on January 31 - February 4, 1994, three 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, these violations are listed below:

1. Limerick Generating Station Unit 1 and Unit 2 Technical Specifications, Amendments 47 (Unit 1) and 10 (Unit 2), dated October 4, 1990, Section 6.8.1.e, Administrative Controls, require that written procedures for Security Plan implementation be established, implemented, and maintained.

Plant Protection Procedure PP-019, Revision 14, Paragraph 5.3 requires in part that vehicles entering the protected area with unsearched material will be escorted by a Security Force Member in addition to the vehicle escort.

Contrary to the above, on November 19, 1993, the licensee allowed a vehicle with unsearched material to enter the protected area without providing a Security Force Member other than the vehicle escort. In this case, the licensee authorized the use of a security lock to secure the container of unsearched material in lieu of providing a second escort, despite the lack of review and approval of that option.

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

2. Limerick Generating Station Unit 1 and Unit 2 Technical Specifications, Amendments 47 (Unit 1) and 10 (Unit 2), dated October 4, 1990, Section 6.8.1.e, Administrative Controls, require that written procedures for Security Plan implementation be established, implemented, and maintained.

Plant Protection Procedure PP-013, Revision 14, Paragraph 5.4 states in part that, after successfully passing through the explosive detector and metal detector, personnel will be permitted to retrieve their cleared articles from the x-ray discharge and proceed to the area beyond the search equipment.

PP-013 Paragraph 5.7.4 states in part that all persons who require a pat-down search or hand-held metal detector search will be kept under observation until after the appropriate search is conducted.

Surveillance Test Procedure ST-07-084-311-0, Revision 15, Section 7.4, Paragraph 7.4.2, Walk-Through Metal Detectors, states in part that the Security Force Member will

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remove all metals practicable from his/her person (i.e., rings, wrist watches, coins, keys, belt buckles, or other metallic objects) prior to conducting this test.

Contrary to the above, on February 2, 1994, the following were noted:

- An individual was permitted to retrieve his cleared articles from the x-ray discharge prior to being searched with a hand-held metal detector;
- An individual who was required to be searched with a hand-held metal detector was not kept under observation until after that search was conducted; and
- A Security Force Member was preparing to perform a surveillance test of the walk-through metal detectors without removing a belt buckle from his person. (The inspectors requested that he remove the belt buckle before the tests.)

These are examples of a Severity Level IV violation. (Supplement III)

3. Section 3.2.2 of the licensee's NRC-approved Physical Security Plan (the Plan), Paragraph 1, requires that all vehicles be searched for firearms, explosives, and incendiary devices prior to entry into the Protected Area. That search is further required to include the vehicle cab, engine compartment, undercarriage and cargo areas.

Contrary to the above, on February 4, 1994, a Security Force Member search of a vehicle incident to vehicle entry into the Protected Area did not include two covered cargo areas located on the lower right side of the vehicle.

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

Pursuant to the provisions of 10 CFR 2.201, PECO Energy 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.

Any Safeguards Information, as defined in 10 CFR 73.21, contained in your submittal should be included in an enclosure so that the transmittal letter without the Safeguards Information can be placed in the NRC's Public Document Room in accordance with 10 CFR 2.790(a).

Dated at King of Prussia, Pennsylvania  
this 2nd day of March, 1994