

APPENDIX A
NOTICE OF VIOLATION

Philadelphia Electric Company
Limerick Generating Station
Units 1

Docket No. 50-352
License No. NPF-39

During an NRC inspection conducted on January 19, through February 22, 1994, 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 procedure adherence and temporary change methods.

Administrative Procedure A-3, Revision 15, Temporary Changes to Approved Procedures and Partial Procedure Use, Step 7.2.8, written to comply with TS 6.8.1, states, in part, the person discovering the mismatch between conditions and procedure shall inform their line supervision. The problem may be resolved by one of the following alternatives:

1. Restore the plant, system, or equipment to conditions that permit use of the procedure.
2. Delay performance of the action or operation until the conditions are suitable for performance.
3. Execute a Temporary Change to the procedure.
4. Revise the procedure to correct the discrepant condition.

Contrary to the above, on February 12, 1994, while performing surveillance test (ST)-2-036-704-1, Excess Flow Check Valve Functional Test, an instrumentation and controls (I&C) technician discovered a mismatch between step 6.1.3.1.G, which required verifying that the TRIP LED on LIS-42-IN680C was off, when in fact, the TRIP LED was on, and corrected the mismatch by performing a procedural step out of sequence. The problem was not resolved by one of the following alternatives: 1) restoring the equipment to conditions that permit use of the procedure; 2) delaying

performance of the action until the conditions are suitable for performance; 3) executing a temporary change to the procedure; or 4) revising the procedure to correct the discrepant condition.

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

- B. Technical Specification (TS), Section 6.8.1, states, in part, written procedures shall be established, implemented, and maintained covering implementation of the Fire Protection Program. Administrative Procedure A-12, Revision 5, Ignition Source Control Procedure, was written to comply with TS 6.8.1.

Contrary to the above, the requirements of A-12 were not met as evidenced by the following examples:

1. Step 7.2.3 of A-12 requires that minimum fire watch requirements are one dedicated individual for each ignition source operation. However, on February 10, 1994, the inspectors observed an individual on a platform in the Unit 1 reactor building performing a grinding operation (ignition source activity per step 4.2 of A-12) without a dedicated fire watch present.
2. Step 7.4.1 of A-12 requires that the ignition source worker shall insure that at the completion of the portion of the job which uses the ignition source, that the ignition source is removed or made passive. In the case of a welding machine, this can be achieved by turning it off or disconnecting the welding lead sets. However, on February 18, 1994, the inspectors identified an unattended welding machine that was energized.
3. A-12, Appendix A, Precaution Check List items 3.b and c, requires that electrical equipment and combustible materials below or within about 35 feet of the ignition source are protected (or removed in the case of combustibles) by fireproof material between the ignition source and the electrical equipment or combustible material. However, on February 17, 1994, the inspectors observed simultaneous grinding operations (ignition source activity) being performed in the upper level of the Unit 1 A RHR heat exchanger room. The grinding operations were carried out over open grating and no fireproof material was used to protect the areas adjacent to or underneath the grinding activity from the sparks that were being produced and which were falling down through the open grating to the other elevations of the RHR heat exchanger room where there were combustibles and electrical equipment.
4. A-12, Appendix B, Dedicated Firewatch Instructions, step 10, requires that the fire watch shall know the location of the nearest phone and pager as listed on the ignition source control checklist. However, on February 18, 1994, the

inspectors questioned a fire watch assigned to observe a welding activity on an elevated platform, and determined that the fire watch was not knowledgeable of the location of the nearest phone and pager.

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

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.

Dated at King of Prussia, Pennsylvania
this 11th day of March