

APR 07 1994

Docket Nos. 50-352  
50-353

Mr. D. M. Smith  
Senior Vice President  
Nuclear  
PECO Energy  
Nuclear Group Headquarters  
Correspondence Control Desk  
P. O. Box 195  
Wayne, PA 19087-0195

Dear Mr. Smith:

SUBJECT: NRC Combined Inspection Nos. 50-352/94-07; 50-353/94-07

This letter transmits the findings of an announced inspection of the radiological controls program conducted at the Limerick Nuclear Generating Station by Mr. R. L. Nimitz of this office on February 15 -18, 1994. The findings of the inspection were discussed with Messrs. D. Helwig and R. Boyce and other members of your staff at the conclusion of the inspection on February 18, 1994, and with Messrs. Boyce and G. Murphy of your staff by Messrs. Nimitz and R. Bores of this office by telephone on April 4, 1994. This letter also refers to your letter dated February 11, 1994, submitted in response to our letter dated January 25, 1994.

Areas reviewed during the inspection are important to health and safety and are discussed in the enclosed inspection report. The areas reviewed included previous findings, program changes and enhancements, organization and staffing, training and qualifications, efforts to maintain radiation exposures as low as is reasonably achievable (ALARA), external and internal exposure controls, radioactive material and contamination controls, an unauthorized entry into an area posted as a High Radiation Area, and station conditions. The inspector also selectively reviewed the implementation of the revised 10 CFR Part 20 (effective January 1, 1994). The inspection principally focused on the adequacy and implementation of radiological controls for the Unit 1 refueling outage. However, activities at Unit 2 were also reviewed.

The results of the inspection indicated that station efforts to maintain occupational exposure ALARA were generally very good, as were overall controls for radioactive material and contamination. Radiological controls for the Unit 1 outage were generally good. The inspector determined that appropriately trained and qualified personnel were overseeing outage radiological control activities. Supervisory oversight of radiological work activities was considered generally good.

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One unresolved item, associated with monitoring of maximum occupational exposure of personnel working in radiation dose rate gradients, was identified. Your staff took immediate action on this matter to re-position the involved workers relative to the dose rate gradients and was reviewing this matter at the end of the inspection. Please note that, consistent with 10 CFR Part 20.1201 (c), the assigned deep-dose-equivalent and shallow-dose-equivalent must be for the part of the body receiving the highest exposure. We believe that your procedural controls in this area appear to need enhancement. We request that you respond to this letter and provide the results of your review of this matter.

Regarding the unauthorized entry into an area posted as a High Radiation Area (Unit 1 Traversing Incore Probe (TIP) Room roof), our review identified that one individual consciously crossed a barricade clearly posted as a "High Radiation Area, RWP required for entry", and entered and worked in the demarcated area for about four hours without the required Radiation Work Permit (RWP). The individual believed he had been given oral permission to enter the area by a representative of your radiation protection staff despite the postings. This entry represents a violation of your High Radiation Area access control program. We note that this violation was identified by your staff, prompt interim corrective actions were taken, and no significant personnel exposure occurred. Although the area was posted as a High Radiation Area, the area exhibited low radiation levels and your staff had conservatively posted the area in light of elevated radiation levels that are encountered during movement of traversing incore probes.

We further noted that an event review team was established by your staff to review the unauthorized entry as part of your performance enhancement program (PEP). Your reviews and our reviews did not indicate willfulness on the part of the individual. Rather, weaknesses in inter-departmental communication regarding radiological controls for the entry were identified as a primary cause of the unauthorized entry.

We reviewed this violation relative to NRC's Enforcement Policy (10 CFR Part 2, Appendix C., Section VII.B.2) regarding exercise of discretion for licensee identified violations. Among the criteria which must be met when considering exercise of discretion is whether the violation could reasonably have been prevented by the licensee's corrective actions for a previous violation or a previous licensee finding that occurred within the past two years of the inspection at issue.

Although we acknowledge that no significant exposure occurred during the individual's time on the TIP Room roof, we are concerned about this entry. Specifically, our review identified that three instances of unauthorized entry into an area posted as a High Radiation Area, also without required radiation work permits, occurred on November 19, 1993 (reference NRC Combined Inspection Nos. 50-352/93-32; 50-353/93-32, dated January 25, 1994). The corrective actions taken at that time included enhancement of postings and dissemination to all station staff on December 3, 1993, documented expectations that each and every worker read, understand and comply with posted information. A pictorial indication of a "High Radiation Area, RWP Required for Entry" posting was included in the literature distributed to station staff at that time.

The literature indicated that personnel are required to be logged in on the appropriate RWP before entering areas with such postings.

Since we believe that it is reasonable to expect that the instructions provided station staff following the November 3, 1993, unauthorized entries could have prevented the February 2, 1994, event, we have elected to cite this violation. This violation is identified in the enclosed Notice of Violation. We note that this violation appears to indicate a lack of sensitivity by personnel to radiation protection requirements and postings, a concern which we also expressed in our January 25, 1994, letter to you. We also note that weaknesses in communications between the radiological controls department and other departments were noted in inspections performed in October 1992 (reference NRC Combined Inspection Nos. 50-352/92-26; 50-353/92-26) and March 1993 (reference NRC Combined Inspection Report Nos. 50-352/93-04; 50-353/93-04). It appears that your efforts to improve communications between the radiological controls organization and other station departments have not been fully successful.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and planned to prevent recurrence. In addition, we request that you re-evaluate the corrective actions described in your February 11, 1994, letter and identify those additional actions, taken or planned, to strengthen personnel adherence to station radiological control requirements and postings. We also request that you specifically identify those actions taken or planned to enhance communications between the radiological control department and other station departments to enhance control and coverage of radiological work activities.

After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96.511.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

Your cooperation with us in this matter is appreciated.

Sincerely,  
Original Signed By;  
James H. Joyner

James H. Joyner, Chief  
Facilities Radiological Safety  
and Safeguards Branch  
Division of Radiation Safety  
and Safeguards

Enclosures:

1. Notice of Violation
2. NRC Combined Inspection Report Nos. 50-352/94-07; 50-353/94-07

cc w/encls:

J. Doering, Chairman, Nuclear Review Board  
D. R. Helwig, Vice President - Limerick Generating Station  
G. A. Hunger, Jr., Manager - Licensing Section  
J. L. Kanter, Regulatory Engineer - Limerick Generating Station  
Secretary, Nuclear Committee of the Board  
Public Document Room (PDR)  
Local Public Document Room (LPDR)  
Nuclear Safety Information Center (NSIC)  
K. Abraham, (2)  
NRC Resident Inspector  
Commonwealth of Pennsylvania

PECO Energy

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bcc w/encls:

Region I Docket Room (with concurrences)

K. Gallagher, DRP

bcc w/encls: (Via E-Mail)

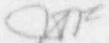
V. McCree, OEDO

F. Rinaldi, NRR

C. Miller, PDI-2, NRR

M. Shannon, ILPB

RI:DRSS



for Nimitz

4/5/94

RI:DRSS



Boves

4/05/94

RI:DRSS



Joyner

4/7/94

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