

APR 22 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, Pennsylvania 19087-0195

Dear Mr. Smith:

SUBJECT: SPECIAL TEAM INSPECTION 50-352/94-09 & 50-353/94-09

This letter transmits the findings of the special team inspection led by Mr. W. L. Schmidt of this office between March 1 and 15, 1994, at the Limerick Generating Station, Limerick, Pennsylvania. At the conclusion of the inspection, Mr. Schmidt discussed our findings with you and members of your staff.

The team focused on areas important to reactor safety, at Unit 1, which was in its fifth refueling outage. This included a review of five recent events and the conduct and completion of the refueling outage. The events included three inadvertent losses of shutdown cooling, improper control of a fuel bundle during refueling, and the inadvertent tripping of a Unit 2 recirculation loop pump because of work conducted at Unit 2 that should have been completed on Unit 1. The team conducted a Human Performance Investigation Process review of each event. Also reviewed were outage scheduling and planning, control of work activities, the status of safety-related areas and equipment before reactor start-up, and the controls and activities involved with reactor start-up.

The team concluded that strong outage scheduling, planning, and conduct resulted in a safe outage. The team determined that each event discussed in the report was of low safety consequence and that for the events where human performance was an issue, personnel inattention-to-detail was a common factor. Further, in these events there were indications that supervisory involvement could have been strengthened. Your performance enhancement process (PEP) is functioning well, allowing for the identification and correction of problems. The control of work activities and the overall condition of Unit 1 prior to and after reactor start-up was good. The team concluded that the control room operators performed very well in preparation for and during reactor start-up.

The team identified two unresolved items during the inspection. The first concerns an instance where an hourly roving fire watch, required by technical specifications, had not been completed for a two hour period. The team considered that this was not a safety

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significant event, however, the team found that your staff did not consider this to be a technical specification violation and therefore not reportable under 10 CFR 50.73. The unresolved issue is whether the two other workers, in the area at the time, satisfied the TS requirements or just mitigated the situation. This item is open pending further NRC review of PECO's position.

Secondly, the team identified that aspects of your safety-related battery testing, required by technical specifications, may not allow for trending of overall battery degradation, due to pre-test battery cell replacement. This issue was considered unresolved pending further review of PECO documentation and NRC determination on the suitability of the battery testing being conducted.

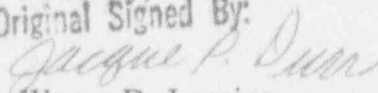
Additionally, the team found that the controls over outage related fire protection activities needed strengthening. These issues were the subject of internal PECO performance enhancement process reports and a recent NRC violation documented in Combined Inspection Report 94-02. Please review the fire protection issues discussed in section 6.3 of the enclosed report and include any additional corrective actions in your response to the violation documented in Combined Inspection Report 94-02.

It is important to note that overall the team found that your staff performed in an excellent manner during this outage. However, the issues identified by the team surrounding personnel inattention-to-detail, the unresolved items on safety related battery testing and a missed fire watch, the fire protection issues, and the more minor issues warrant management attention.

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 is appreciated.

Sincerely,  
Original Signed By:

*for*   
Wayne D. Lanning  
Acting Director  
Division of Reactor Projects

Enclosures:

1. NRC Region I Special Team Inspection Report 50-352/94-09 & 50-353/94-09

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Mr. D. M. Smith

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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. Kantner, 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, PAO (2)  
NRC Resident Inspector, Limerick  
Commonwealth of Pennsylvania

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Mr. D. M. Smith

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bcc w/encl:  
Region I Docket Room (with concurrences)

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C. Miller, PDI-2, NRR  
D. Vito, ORA  
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WLanning  
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