

NOTICE OF VIOLATION

Philadelphia Electric Company
Limerick Generating Station

Docket No. 50-352
50-353

License No. NPF-39
NPF-89

During an NRC inspection conducted on December 3-7, 1990 a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1990), the violation is listed below:

- A. Technical Specification 6.11 "Radiation Protection Program" for both units requires that procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure. Station health physics procedure HP-715, Revision 9, Paragraph 6.3.4 states, in part, that for surveys performed on outgoing exclusive use vehicles, "...take radiation reading as described in Attachment 8.2.". Attachment 8.2 to HP-715 establishes an administrative limit of 1.6 mrem/hour in the driver compartment (contact with rear of cab/sleeper).

Contrary to the above, on November 8, 1990, the licensee shipped radioactive material to the Quadrex Recycling Center in Oak Ridge, Tennessee in a vehicle where driver compartment dose rates exceeded the administrative limit established in HP-715. During surveys performed upon receipt of the vehicle at Quadrex, driver compartment dose equivalent rates were determined to be 4.5 to 5.0 mrem/hour.

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

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 1, and if applicable, a copy to the NRC Resident Inspector, 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 that have been 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 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.