



PECO ENERGY

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10 CFR 2.201

May 4, 1994
Docket No. 50-352
License No. NPR-39

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

SUBJECT: Limerick Generating Station, Unit 1
Reply to a Notice of Violation
NRC Combined Inspection Report Nos. 50-352/94-07
and 50-353/94-07

Attached is PECO Energy Company's reply to a Notice of Violation for Limerick Generating Station (LGS), Unit 1, which was contained in your letter dated April 7, 1994. The cited violation involved the failure to adhere to radiation protection procedures in accordance with the requirements of Technical Specifications Section 6.11. The attachment of this letter provides a restatement of the violation identified at LGS Unit 1 during an NRC inspection conducted February 15 - 18, 1994 followed by our reply.

If you have any questions or require additional information, please contact us.

Very truly yours,

FDR:cah

Attachment

cc: T. T. Martin, Administrator, Region I, USNRC
N. S. Perry, USNRC Senior Resident Inspector, LGS

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bcc: D. M. Smith - CB, 63C-3	w/attachment
J. B. Cotton - CB, 53A-1	"
R. W. Boyce - GML5-1	"
W. F. Sproat, III - GML2-A	"
C. L. Adams - SMB2-1	"
J. G. Hufnagel - SMB3-2	"
C. A. Mengers - SSB4-3	"
G. A. Hunger, Jr. - CB, 62A-1	"
J. L. Kantner - SMB3-1	"
J. Doering, Jr. - CB, 63C-5	"
Secretary, NCB - CB, 63C-7	"
PA DER BRP Inspector - SMB3-1	"
Commitment Coordinator - CB, 62A-1	"
Correspondence Release Point - SMB1-2	"
DAC	"

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Reply to a Notice of Violation

Restatement of the Violation

During an NRC inspection conducted on February 15-18, 1994, 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, the violation is listed below.

Technical Specification 6.11 requires adherence to radiation protection procedures.

Radiation Protection Procedure A-C-107, Revision 1, Radiation Work Permit Program and Radiological Controlled Area Access, states, in part, in Section 5.0, that all workers are responsible for complying with established postings in the radiological controlled area (RCA).

Contrary to the above, on February 2, 1994, an Instrument and Control (I&C) Technician did not comply with established postings in the radiological controlled area. Specifically, the roof top area of the Unit 1 Traversing Incore Probe (TIP) area was posted as a "High Radiation Area, RWP Required For Entry," and the I&C Technician entered and worked in the area for about four hours without obtaining the required radiation work permit (RWP).

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

RESPONSE

Admission of the Violation

PECO Energy Company acknowledges the violation.

Reason for the Violation

The primary cause was misunderstood verbal communications between a Health Physics (HP) Technician and an I&C Technician. A lack of clear communication resulted in the I&C Technician believing the HP Technician had given him permission to proceed past a HP posting and rope barrier.

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A contributing factor to this violation was the practice of continuously posting the TIP room roof as a High Radiation Area, when it was known that this condition only exists for a brief period after TIP withdrawal from the core. This may have lessened the sensitivity to the high radiation posting.

Another contributing factor was that the HP Technician who engaged in the misunderstood verbal communication with the I&C Technician lacked a clear understanding of the current posting arrangements and was unprepared to provide direction to the I&C Technician.

Corrective Actions Taken and Results Achieved

An assessment was performed to verify that an over-exposure did not occur. Assuming 4 hours in the subject work area the maximum exposure of the I&C Technician was calculated to be 16 mrem over the 4 hours.

The HP group had an all hands meeting on February 3, 1994, to discuss this specific event with emphasis on communications and radiological postings.

The I&C Group had an all hands meeting on February 3, 1994 to discuss this specific event with emphasis on communications and radiological postings.

A special addition of the site news publication, Possum Hollow Press, was issued on February 4, 1994 which provided detailed expectations for compliance with Radiological Postings, a brief description of this event and an expectation for effective communication.

This incident was treated as a serious infraction of the disciplinary guidelines and the two individuals involved were disciplined appropriately.

Both LGS Unit 1 and Unit 2 TIP room roofs were immediately resurveyed and deposted and a posting standard was developed for future TIP room roof posting.

The TIP room roof RWP was upgraded and put in a suspended status awaiting its next use.

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Focus group meetings were held between HP and I&C personnel to discuss practices, standards and communications expectations. The product of these meetings was the development of specific performance standards for I&C Radiological work activities.

Corrective Actions to Avoid Future Non-compliance

The HP Technical Continuing Training lesson plan was revised to include this event as a lesson learned. Training for HP Technicians will be completed by 12/31/94.

A video reviewing compliance with radiological postings and RWP's was developed. This video includes simulations demonstrating errors made in this and previous LGS and Peach Bottom Atomic Power Station events. The video will be shown to each station work group by 7/1/94.

Date When Full Compliance was Achieved

Full compliance was achieved on February 2, 1994, when The I&C Technician exited the area of the TIP room roof.