

U. S. NUCLEAR REGULATORY COMMISSION
REGION I

Report Nos. 50-277/92-06
50-278/92-06
50-352/92-09
50-353/92-08

Docket Nos. 50-277
50-278
50-352
50-353

License Nos. DPR-44
DPR-56
NPF-39
NPF-85

Licensee: Philadelphia Electric Company

Facility Name: Peach Bottom Atomic Power Station, Units 2 and 3
Limerick Generating Station Units 1 & 2

Inspection At: Chesterbrook Blvd., Wayne, Pennsylvania; Delta, Pennsylvania and
Limerick, Pennsylvania

Inspection Conducted: February 10-14, 1992

Inspectors: M. Buckley, Reactor Engineer

Suresh K. Chaudhary
Suresh K. Chaudhary, Sr. Reactor Engineer,
Systems Section, EB, DRS

2/25/92
date

Approved by: Dr. P.K. Eagen
Dr. P.K. Eagen, Chief, Systems Section,
Engineering Branch, DRS

2/27/92
date

Results: See Conclusion

1.0 FOLLOWUP OF PREVIOUSLY IDENTIFIED ITEMS

The scope of this inspection was to followup on items identified in previous NRC inspection reports. The licensee had responded by letter to the NRC regarding their evaluations of these matters, planned actions, if needed, and the schedule of the planned corrective actions.

A. Peach Bottom Containment Boundary Upgrade Program

During NRC Inspection 50-277/85-23 and 50-278/85-23, the NRC identified that two containment isolation valves (AO-2502B and AC 2520) were local leak tested using test pressure in a direction opposite to that of the valves during a design basis accident. As a result, the valve stems were not subjected to design pressure. This reverse pressure testing was not consistent with 10CFR 50, Appendix J, Section III.C.1 which requires that "test pressure be applied in the same direction as that when the valve would be required to perform its Safety function ..." A violation (50-277/85-23-01) was issued to address this concern.

The licensee responded to this violation in their letters dated August 28, 1985, November 23, 1987, and March 25, 1988. The licensee's stated corrective action included an extensive review of all containment boundary valves. They also identified fourteen additional valves subject to the same concern discussed in the notice of violation. Thirteen of these sixteen valves were identified for modification during the next refueling outage for each unit. For the three remaining valves, the licensee obtained exemptions from the NRC on November 21, 1990. These corrective actions to the above violations were reviewed and closed in NRC Inspection Report No. 50-277/89-06.

Additional details provided in licensee letters dated September 30, 1991, and January 22, 1992, clarified that the remaining actions for the containment boundary upgrade program will be completed at Unit 2 during the refueling outage scheduled for September 1992.

The inspectors reviewed the technical basis for the action stated in licensee's letters dated September 30, 1991, and January 22, 1992, with the licensee's representatives. Additionally, modification 2075 which implemented the Containment Boundary Upgrade Program, was reviewed and verified that all affected containment isolation valves were adequately identified and incorporated in the program as stated in the licensee's letter dated November 23, 1987. All the required work has been completed for Unit 3 in 1991. The actions for Unit 2 have also been completed with the exception of the work for penetrations N-26 and N-35D, which will be completed during the next refueling outage as stated in the licensee's January 22, 1992, letter.

The inspectors toured the penetration areas of both units on February 13, 1992, and verified that the modification for valves MO-4244A, MO-5244A, 23C-33425, 7C-40155, 7C-40157, 7C-50156, 7C-50154, IIV 3-10-100A, IIV 3-10-100C were implemented as described in the licensee's letter dated November 23, 1987 and the modification 2075. Additionally, the procedure and results of the last integrated leak rate test (ILRT) for both units were reviewed and verified that the valves described in the licensee's letter dated November 23, 1987, remained leak tight during the integrated leak rate test, as stated in the licensee's letter dated January 22, 1992.

Based on the above review, it is concluded that the licensee has taken effective action to resolve the concerns identified in NRC Inspection Reports 50-277/85-23 and 50-278/85-23.

B. Limerick Generating Station Units 1 & 2

The NRC's Probabilistic Risk based inspections (50-352/91-81 and 50-353/91-81) at Limerick Generating Station, in July of 1991, identified violations of several regulatory requirements. The licensee provided written response to these violations in their letter dated January 30, 1992. The purpose of this inspection was to review the adequacy of the licensee's actions in response to these violations

(Closed) Violation; 50-352/91-81-01, and 50-353/91-81-01: These violations pertained to the licensee's failure to assure adequate emergency lighting for safety related equipment. The battery powered emergency lighting had not been maintained to provide suitable lighting or adequate level of illumination. Also, the test and surveillance procedures to verify the operability of these lights were not adequate to detect and/or prevent degradation or inoperability of these lights.

As stated in their response, dated January 30, 1992, to this violation, the licensee has taken corrective action to preclude the loss of emergency diesel generator room emergency lighting and revised procedures to identify and correct failed emergency lighting throughout the plant.

The licensee's revised quarterly surveillance procedures (ST-6-108-300-0, ST-6-108-300-1, ST-6-108-300-2) and maintenance procedure (WI 4784) were reviewed. The revised procedure requires an equipment trouble tag to be issued if emergency lighting does not pass the surveillance test. A plan to specifically identify each battery pack with a unique numbering system is being implemented. Currently, the battery pack location is used for identification. The identification of specific battery packs and changes to the surveillance procedure provide a means to identify, track, and correct failed emergency lighting problems. During the last surveillance performed on January 11, 1992, failed battery packs were identified, repaired, and retested satisfactory.

A walkdown of emergency diesel generator rooms, on a selective basis, was conducted to verify that the emergency lighting was available. The inspector witnessed that the surveillance test procedure was performed for the emergency lighting in each room. All emergency lighting tested illuminated and indicated that the battery pack was charged.

Based on the above observations and the review of revised procedure, the inspector determined that licensee has implemented adequate action to maintain sufficient emergency lighting in areas required for safe shutdown. This item is closed.

(Open) Violation; 50-352/91-81-02 and 50-353/91-81-02: These items pertained to the licensee's failure to promptly identify and correct conditions adverse to quality. Several of the licensee's documentation of surveillance and tests, their technical services, and quality control verification of the adequacy and acceptability of recorded data were not adequate to identify and correct adverse conditions. The licensee responded to this violation by informing the NRC that the procedures for documentation had been strengthened to avoid such concerns in review and approval of test data and documentation.

However, the NRC resident inspectors at the Limerick Generating Station identified similar inadequacies in the licensee's documentation and review process for the residual heat removal system heat exchanger inlet valve (HV51-IF14B). The problem identified was from a period after the licensee's corrective actions in response to this violation had been implemented. These items remain open until future inspection and review is performed by the NRC.

2.0 MANAGEMENT MEETING

The inspectors met with those denoted in Attachment I on February 12, 1992, at Chesterbrook, February 13, 1992, at Peach Bottom, and February 14, 1992, at Limerick to discuss the preliminary inspection findings as detailed in the report.

ATTACHMENT I

Persons Contacted

Philadelphia Electric Company

T. Loomis	HQ Regulatory
E. Upstein	HQ Lead Engineer
M. Townsend	HQ Engineer
J. Jordan	PBS Tech Specialties
R. Smith	PBS Regulatory
M. Fanelli	PBS LLRT Coordinator
D. Foss	PBS Regulatory
J. Doering	LGS Plant Manager
R. Boyce	LGS Superintendent Main, I&C
R. Lesnefsky	LGS Superintendent NQA
R. Storti	LGS NQA
T. Szonntas	LGS NED/Site Engineer
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U.S. Nuclear Regulatory Commission

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