

APPENDIX A

NOTICE OF VIOLATION

Philadelphia Electric Company
Limerick Unit 1

Docket No. 50-352
License No. Nr. 39

During an NRC inspection conducted on January 5 through February 15, 1992, 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 (1992), the violation is listed below:

Limerick Technical Specification 6.8.1.a. requires that written procedures be established, implemented and maintained to cover the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. For maintenance that can affect the performance of safety-related equipment, Regulatory Guide 1.33, Appendix A, Section 9.a. recommends it be properly preplanned and performed in accordance with written procedures, documented instructions, or drawings.

Contrary to the above, on January 14, 1992, during maintenance on the residual heat removal heat exchanger inlet isolation valve (HV51-1F014B), the approved maintenance procedure PMQ-500-087, "Preventative Maintenance Procedure for Electrical Checkout and Adjustment of Limitorque Operators," was not properly implemented as evidenced by the following examples:

1. Procedure PMQ-500-087 prerequisite steps 4.2 and 4.4, requires the job leader to record the appropriate torque switch settings and stroke time data, from the Field Engineering Data Sheet, on the Maintenance Data Record Form. The job leader failed to record the torque switch settings and stroke times.
2. Procedure PMQ-500-087, step 7.9.2. requires the performance of a stroke time test of the motor operated valve and verification that the results are acceptable. The job leader signed this step as complete without verifying the acceptability of the stroke time test results.
3. Procedure PMQ-500-087, step 7.10.1, requires the mechanic and quality control inspector verify that test switches, installed earlier in the procedure, are removed. Both the mechanic and quality control inspector annotated this step as not applicable although the mechanic actually removed the switches.

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

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 I, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, 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 achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.