

APPENDIX A

NOTICE OF VIOLATION

Philadelphia Electric Company
Limerick Generating Station, Unit 1

Docket No. 50-352
License No. CPPR-106

As a result of the inspection conducted on April 1-30, 1984, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C) published in the Federal Register Notice (49 FR 8583) dated March 8, 1984, the following violations were identified:

- A. 10 CFR 50, Appendix B, Criterion III requires the establishment of measures to assure that applicable design basis for systems and components are correctly translated into drawings.

Section 3 of Volume 1 of the Limerick Generating Station Quality Assurance Plan implements these requirements of Criterion III.

Contrary to the above, as of April 24, 1984, the measures established to incorporate implemented design changes into applicable drawings failed to assure that all changes made to the high pressure coolant injection system by Design Change Package 232 were reflected in Piping and Instrumentation Diagram M42.

This is a Severity Level V Violation (Supplement II).

- B. 10 CFR 50, Appendix B, Criterion V requires that activities affecting quality shall be prescribed by appropriate procedures and these procedures shall be followed during performance of these activities.

Startup Administrative Procedure AD 1.2-2 and Appendix Z to Volume 1 of the Limerick Generating Station Quality Assurance (QA) Plan require that Startup Nonconformance Reports be reviewed by the licensee's Quality Control and Quality Assurance organizations to determine if conditions exist which require reporting to the NRC per 10 CFR 50.55e.

Contrary to the above, AD 1.2-2 and Appendix Z to the QA Plan were not effectively followed in that the review provided for Startup Nonconformance Reports S-346-M, S-347-M, and S-414-M, involving failures of electrohydraulic operators for ventilation system dampers, failed to identify that these failures constituted a condition which warranted reporting.

This is a Severity Level V Violation (Supplement II).

- C. 10 CFR 50, Appendix B, Criterion V requires that activities affecting quality shall be prescribed by appropriate procedures.

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Section 16 of the Startup Activity Section of the Limerick Generating Station Quality Assurance Plan requires that measures shall be established to assure conditions adverse to quality are promptly identified, reported and corrected.

Contrary to the above, the measures necessary to promptly identify, report and correct those conditions adverse to quality which were associated with facility buildings, areas and rooms were not prescribed by appropriate Start-up Administrative procedures as required by the Limerick Quality Assurance Plan.

This is a Severity Level V Violation (Supplement II).

Pursuant to 10 CFR 2.201, Philadelphia Electric Company is hereby required to submit to this office, within 30 days of the date of the letter transmitting this Notice, a written reply including: (1) corrective steps taken and the results achieved; (2) the corrective steps taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending your response time.

LIMERICK HEARING SERVICE LIST

Judge Lawrence Brenner
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Judge Richard F. Cole
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Judge Peter A. Morris
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Atomic Safety and Licensing
Appeal Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Mr. Frank R. Romano
61 Forest Avenue
Ambler, Pennsylvania 19002

Mr. Robert L. Anthony
Friends of the Earth of
the Delaware Valley
P.O. Box 186
103 Vernon Lane
Moylan, PA 19065

Mr. Marvin I. Lewis
6504 Bradford Terrace
Philadelphia, PA 19149

Phyllis Zitner
LER
P.O. Box 761
Pottstown, PA 19464

Docketing and Service Station
Office of the Secretary
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Ann P. Hodgdon, Esq.
Benjamin H. Vogler, Esq.
Counsel for NRC Staff
Office of the Executive
Legal Director
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Philadelphia Electric Company
ATTN: Edward G. Bauer, Jr.
Vice President &
General Counsel
2301 Market Street
Philadelphia, PA 19101

David Wersan, Esq. Consumer
Assistant Advocate
Office of Consumer Advocate
1425 Strawberry Square
Harrisburg, PA 17120

Steven P. Hershey, Esq.
Community Legal Services,
Inc.
Law Center
North Central Beury Bldg.
3701 North Broad Street
Philadelphia, PA 19140

Angus Love, Esq.
101 East Main Street
Norristown, PA 19401

Mr. Joseph H. White, III
15 Ardmore Avenue
Ardmore, PA 19003

LIMERICK HEARING SERVICE LIST

Charles W. Elliott, Esq.
Drose and Postwistilo
1101 Building
11th & Northampton Street
Easton, PA 18042

Robert J. Sugarman, Esq.
Sugarman & Denworth Suite
510 North American Building
121 South Broad Street
Philadelphia, PA 19107

Director, Pennsylvania
Emergency Management Agency
Basement, Transportation
and Safety Building
Harrisburg, PA 17120

Thomas Y. Au, Esq.
Assistant Counsel
Commonwealth of Pennsylvania
DER
505 Executive House
P.O. Box 2357
Harrisburg, PA 17120

Martha W. Bush, Esq.
Kathryn S. Lewis, Esq.
City of Philadelphia
Municipal Services Bldg.
15th and JFK Blvd.
Philadelphia, PA 19107

Thomas Gerusky, Director
Bureau of Radiation
Protection
Department of Environmental
Resources
5th Floor, Fulton Bank Bldg.
Third and Locust Streets
Harrisburg, PA 17120

Spence W. Perry, Esq.
Associate General Counsel
Federal Emergency
Management Agency
500 C Street, S.W., Rm. 840
Washington, D.C. 20472

Jay M. Gutierrez, Esq.
U.S. Nuclear Regulatory
Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Troy B. Conner, Jr., Esquire
Mark J. Wetterhahn, Esquire
Conner & Wetterhahn
1747 Pennsylvania Ave
Washington, D.C. 20006

U.S. Nuclear Regulatory Commission
ATTN: Mr. J. T. Wiggins
Senior Resident Inspector
P.O. Box 47
Sanatoga, PA 19461