

APPENDIX A

NOTICE OF VIOLATION

Philadelphia Electric Company
Limerick Generating Station, Unit 1

Docket Nos. 70-2988
50-352
License Nos. SNM-1926
CPPR-106

As a result of the inspection conducted on April 24 and 26-27, 1984, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violation was identified:

Special Nuclear Material License No. SNM-1926 dated April 3, 1984 states in License Condition No. 9 that the license is authorized for use in accordance with statements, representations, and conditions specified in the revised application dated January 24, 1984 and its supplements dated February 6 and 27, 1984. The January 24, 1984 letter states, in part, in section 2.1, "Radiation Control", that all instruments shall be tested and calibrated routinely in accordance with approved station procedures.

1. Radiation Protection Procedure No. HP-401, Revision 0, "Control Accountability, Maintenance and Repair of Health Physics Instrumentation," requires in section 6 that all radiation survey equipment in use will be source checked at least daily. If the source check reading is not within $\pm 20\%$ of the listed reading, the instrument is to be removed from service and tagged. Health Physics Group Information Notice No. 84-01, "Techniques for Performing Response Checks," dated March 13, 1984 specifies that the PRM-6 survey meter with HP-210 probe should read between 35,000 and 50,000 counts per minute (CPM) when source checked.

Contrary to the above, on April 24, 1984, a PRM-6 with HP-210 probe (SN #1123) failed to meet the source check acceptance criteria specified in procedure HP-401 and IN 84-01 and was neither removed from service or tagged. The instrument was used to survey personnel and articles in the fuel receipt area.

2. Radiation Protection Procedure No. HP-469, Revision 0, "Calibration of Eberline PRM-6 Pulse Rate Meter," dated March 20, 1984 requires for calibration (in section 6) that an efficiency determination, using a beta source be performed.

Contrary to the above, on April 24, 1984, an Eberline PRM-6 (SN #1123) with an HP-210 probe, that had not been efficiency checked for beta, was used to check personnel and equipment for contamination.

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

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Q PDR

Pursuant to the provisions of 10 CFR 2.201, Philadelphia Electric Company is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be 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 this response time.

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Judge Richard F. Cole
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