

October 6, 1995

Mr. D. M. Smith
Senior Vice President-Nuclear
PECO Energy
Nuclear Group Headquarters
Correspondence Control Desk
P.O. Box 195
Wayne, Pennsylvania 19087-0195

SUBJECT: COMBINED INTEGRATED INSPECTION REPORT NOS. 50-352/95-12 AND
50-353/95-12 AND NOTICES OF VIOLATION

Dear Mr. Smith:

This letter transmits the results of the safety inspection by Messrs. N. Perry, T. Easlick, L. Cheung, R. Nimitz, and F. Rinaldi from July 19, through September 18, 1995, at the Limerick Generating Station, Limerick, Pennsylvania. The inspection focused on issues important to ensuring the public health and safety and consisted of observation of activities, review of documents and interviews with plant personnel. The results are documented in the enclosed report and were discussed with Mr. R. Boyce of your staff at the conclusion of the inspection.

Based on the results of this inspection, the NRC has determined that violations of NRC requirements occurred. These violations are cited in the enclosed Notices of Violation (Notice) and the circumstances surrounding them are described in detail in the subject inspection report. The first violation, concerning the primary containment recombiners and the associated modification issues, are of significant concern to the NRC, because your design and testing process did not identify and prevent the errors that led to the inoperable recombiners. The comprehensive investigation performed by your engineering staff identified numerous causes or contributors to this event that warrant your attention.

The inspection indicated that overall, very good radiological controls were implemented for the Unit 1 mini-outage including ALARA exposure controls. Very good efforts were on-going for review, evaluation, and enhancement of the radioactive material and contamination control programs. A second violation associated with adherence to radiation protection procedures was identified by the NRC. The violation reflected an apparent need to reenforce expectations regarding worker actions when job plans change. We understand such training is being provided to the work force. The information you provided regarding the reason for the violation and the corrective actions taken and planned to correct the violation and prevent recurrence is discussed in the enclosed NRC inspection report. We have concluded that this information appears adequate to address this violation and therefore, you are not required to respond to this letter. However, if the report does not accurately reflect these matters and your position, or if you choose to provide additional information, you should follow the instructions specified in the enclosed Notice. We will review your corrective actions during a subsequent inspection.

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The inspectors determined that your staff had taken extensive corrective actions in response to the August 8, 1995, momentary loss of power supply in the feedwater control system, which resulted in a reactor scram. Although definite root causes could not be determined, the inspectors considered your staff had used a proper methodology to determine the most probable root cause.

During this inspection period, an abnormally high number of significant events occurred at Limerick. Although we were unable to identify a clear tie between any of the events, the NRC is concerned about this recent adverse trend in plant performance.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice, concerning the recombiner violation, when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosure(s), and your response will be placed in the NRC Public Document Room (PDR). To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction.

The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96.511.

Your cooperation is appreciated.

Sincerely,

ORIGINAL SIGNED BY:

Clifford J. Anderson, Chief
Reactor Projects Section 2B, PB2
Division of Reactor Projects

Docket Nos. 50-352
50-353

License Nos. NPF-39
NPF-85

Enclosures:

1. Notices of Violation
2. NRC Region I Inspection Report 50-352/95-12 & 50-353/95-12

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cc w/encl:

G. A. Hunger, Jr., Chairman, Nuclear Review Board and Director - Licensing

W. MacFarland, Vice President - Limerick Generating Station

J. L. Kantner, Regulatory Engineer - Limerick Generating Station

Secretary, Nuclear Committee of the Board

Nuclear Safety Information Center (NSIC)

Commonwealth of Pennsylvania

Mr. D. M. Smith

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Distribution w/encl:
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