

APPENDIX A

NOTICE OF VIOLATION

PECO Energy
Limerick Nuclear Generating Station
Units 1 and 2

Docket Nos. 50-352, 50-353
License Nos. NPR-39, NPR-85

During an NRC inspection conducted on July 19, through September 18, 1995, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (60 FR 34381; June 30, 1995), the violation is listed below:

10 CFR Part 50, Appendix B, Criterion III, Design Control, requires in part, that measures shall be established to assure that applicable regulatory requirements and the design basis, as defined in 10 CFR 50.2 and as specified in the license application, for those structures, systems, and components to which this appendix applies, are correctly translated into specifications, drawings, procedures, and instructions. The design control measures shall provide for verifying or checking the adequacy of design, such as, by the performance of design reviews, by the use of alternate or simplified calculational methods, or by the performance of a suitable testing program.

Technical Specification (TS) 3.6.6.1 states, two independent primary containment hydrogen recombiner systems shall be operable in operational conditions 1 and 2. With one primary containment hydrogen recombiner system inoperable, restore the inoperable system to operable status within 30 days or be in at least hot shutdown within the next 12 hours.

Contrary to the above, from July to September 1995, design controls for modification to three primary containment hydrogen recombiners did not assure that the appropriate design basis was correctly translated into specifications and instructions, nor provide for adequate verification and checking of the design, in that (1) recorder calibration sheets were incorrect and did not reflect the "as built" condition of the plant; (2) an Acceptance Test Plan was not developed in accordance with procedure MOD-C-5, Mod Process Acceptance Testing; and (3) post maintenance modification testing for the hydrogen recombiners did not identify the deficiencies in the logic outputs, contact configuration, and jumper installation in the temperature recorders, which led to the inability to operate three of the four hydrogen recombiners. As a result of this error, the 1A recombiner was inoperable from August 1, 1995 to September 2, 1995; the 1B recombiner was inoperable from August 8, 1995 to September 2, 1995; and the 2A recombiner was inoperable from July 19, 1995 to September 2, 1995, which were in excess of TS 3.6.6.1.

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

Pursuant to the provisions of 10 CFR 2.201, PECO Energy 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).

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