

APR 02 1992

Docket Nos. 50-352  
50-353

EA No. 92-060

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

Dear Mr. Smith:

Subject: Combined Inspection Report Nos. 50-352/92-13 and 50-353/92-13

A special inspection was conducted at the Limerick Generating Station by S. Sherbini on March 26-27, 1992. The purpose of the inspection was to review the circumstances connected with the apparent inhalation of radioactive material by a worker while working in the Unit 1 reactor cavity. This incident occurred on March 25, 1992. The findings of the inspection are contained in the enclosed inspection report.

Areas examined during the inspection are identified in the report, and were limited to specifics of the cited incident. While the amount of radioactive material inhaled by the worker apparently was below the regulatory limit, and has cleared rapidly from the worker's body, we are concerned that poor radiological work practices and an apparent failure of communication between Health Physics personnel and the work crew contributed to the incident. Based on the results of the inspection, an apparent violation of regulatory requirements, involving two examples of failure to follow procedures, was identified. This apparent violation is being considered for escalated enforcement action in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy), 10 CFR Part 2, Appendix C (1992). Accordingly, no Notice of Violation is presently being issued for this inspection finding. In addition, please be advised that the number of violations and the characterization of the apparent violation described in the enclosed inspection report may change as a result of further NRC review.

We are concerned that this unplanned intake of radioactive material occurred, and, in particular, that procedures important to worker health and safety were not followed. Consistent with the telephone conversation between Mr. Graham Leitch and Mr. James Joyner on April 1, 1992, we have scheduled an Enforcement Conference for April 10, 1992, at 10:00 a.m. in the Region 1 office. The purposes of the conference are (1) to discuss the safety significance of the apparent

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violation, its root cause(s), and your corrective actions, (2) to ensure that we have a common understanding of the facts associated with the apparent violation, and (3) to determine if there are mitigating or extenuating circumstances associated with the apparent violation that should be considered by the NRC in determining appropriate enforcement action. As a related issue, some of the circumstances associated with this event appear similar to the topics discussed in our meeting with you and your staff on November 1, 1991. Accordingly, please also be prepared to discuss compliance and conformance with administrative and maintenance procedures by the Nuclear Maintenance Division at the conference.

Sincerely,

Original Signed By:  
James H. Joyner

Richard W. Cooper, II  
Deputy Director  
Division of Radiation Safety  
and Safeguards

Enclosure:

Combined Inspection Report Nos. 50-352/92-13 and 50-353/92-13

cc w/encl:

R. Charles, Chairman, Nuclear Review Board  
G. Leitch, Vice President - Limerick Generating Station  
D. Helwig, Vice President of Nuclear Engineering and Services  
J. W. Durham, Sr., Senior Vice President and General Counsel  
J. Doering, Manager - Limerick Generating Station  
G. J. Beck, Manager - Licensing Section  
G. Hunger, Project Manager - Limerick Generating Station  
J. O'Rourke, Manager - Limerick Quality Division  
G. Madson, Regulatory Engineering - Limerick Generating Station  
Secretary, Nuclear Committee of the Board  
Public Document Room (PDR)  
Local Public Document Room (LPDR)  
K. Abraham, PAO (2)  
NRC Resident Inspector  
Commonwealth of Pennsylvania

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bec w/encl:

Region I Docket Room (with concurrences)

Management Assistant, DRMA (w/o encl)

R. Blough, DRP

R. Clark, NRR

L. Doerflein, DRI

DRS SALP Coordinator

DRSS SALP Coordinator

M. Banerjee, SLO

R. Lobe', OEDO

M. Miller, SLO

J. Partlow, NRR

J. Lieberman, OE

J. Goldberg, OGC

D. Holody, RI

K. Smith, RI

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