

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 June 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 XI and the Startup Activity Section of Volume III of the Limerick Quality Assurance Plan require the establishment of a preoperational test program to assure that systems will perform satisfactorily in service.

FSAR Section 14.2 defines the NRC accepted preoperational test program and specifies the maximum functional criteria to be verified during each system preoperational test.

1. FSAR Section 14.2 and the licensee's response to FSAR Question 640.15 state that the preoperational test program for the standby diesel generators includes three test procedures, IP24.1, IP100.1 and IP100.4, and includes testing to assure each criteria of NRC Regulatory Guide 1.108, Section C.2.a is met.

Contrary to the above, as of June 18, 1984, the diesel generator test program, as implemented, did not include testing to evaluate each diesel generator unit's response to two event sequences identified in Regulatory Guide 1.108: (1) a complete loss of load; and, (2) a loss of coolant accident coincident with a loss of offsite power which occurs while the unit is undergoing periodic surveillance testing.

2. FSAR Section 14.2 states that procedure IP59.1 tests the closure times for all automatic valves controlled by the containment isolation and nuclear steam supply shutoff system.

Contrary to the above, as of June 19, 1984, the final approved version of IP59.1 did not include closure time testing for 34 automatic valves.

3. FSAR Section 14.2 states that the response of the control room HVAC system to a chlorine isolation event will be evaluated during test IP32.2.

Contrary to the above, as of June 12, 1984, the control room HVAC response to a channel A chlorine isolation was not adequately verified as a result of an improperly implemented test change notice (TCN 27).

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

8408210373 840802  
PDR ADDCK 05000352  
Q PDR

- B. 10 CFR 50, Appendix B, Criterion V and Section V of Volume 1 of the Limerick Generating Station Quality Assurance Plan require that activities affecting quality be prescribed by appropriate procedures.

FSAR Section 9.4.5 and the licensee's response to FSAR Question 480.7 describe the valve position indicating system for the primary containment vacuum relief valves. This system is stated to be capable of detecting relief valve opening prior to the 0.05 ft<sup>2</sup> drywell-to-suppression pool steam bypass leak; ie area limit being exceeded.

Research and Testing Procedure RT-11-00001 was used to calibrate the valve position indicating system.

Contrary to the above, calibration procedure RT-11-00001 was not appropriate in that it did not calibrate the primary containment vacuum relief valve position indicating system to the accuracy specified in the FSAR.

This is a Severity Level IV 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.

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

Charles W. Elliott, Esq.  
 Brose 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 19464