

# PHILADELPHIA ELECTRIC COMPANY

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PHILADELPHIA, PA. 19101

(215) 841-4502

JUL - 9 1984

JOHN S. KEMPER  
VICE-PRESIDENT  
ENGINEERING AND RESEARCH

Mr. Thomas E. Murley, Director  
United States Nuclear Regulatory Commission  
Office of Inspection and Enforcement, Region I  
631 Park Avenue  
King of Prussia, PA 19406

Subject: USNRC IE Region I Letter dated June 04, 1984  
RE: Site Inspection of March 28, 30 April 5, 6, 9-13, 1984  
Inspection Report No. 50-352/84-16  
Limerick Generating Station - Unit 1

File: QUAL 1-2-2 (352/84-16)

Dear Mr. Murley:

In response to the subject letter regarding items identified during the subject inspection of construction activities authorized by NRC License No. CPPR-106, we transmit herewith the following:

Attachment I - Response to Appendix A

Also enclosed is an affidavit relating to the response.

Should you have any questions concerning these items, we would be pleased to discuss them with you.

Sincerely,

*JW Gallagher*  
*for*  
*JK Kemper*

JPE/drd/840621/2

Attachment

Copy to: Director of Inspection and Enforcement  
United States Nuclear Regulatory Commission  
Washington, DC 20555

S. K. Chaudhary, USNRC Resident Inspector

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PDR ADOCK 05000352  
PDR  
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ATTACHMENT I

RESPONSE TO APPENDIX A

VIOLATION

10 CFR 50, Appendix B, Criterion XI, Test Control, requires that test procedures include provisions for assuring that all prerequisites for a given test have been met.

Colt Industries, Fairbanks Morse Engine Division diesel engine startup procedure requires that cooling water flow be established and verified prior to running the emergency diesel engine.

Contrary to the above, on April 10, 1984, the vendor diesel engine startup procedure was not effectively implemented when the 'C' Emergency Diesel Generator was started without adequately assuring that the prerequisite cooling water flow was established and verified and the engine was run for approximately 11 minutes, including 4 minutes at fully loaded conditions.

RESPONSE

Steps were taken immediately after this occurrence to identify to all parties associated with the operation of the diesel generators the minimum requirements which must be satisfied prior to diesel start. Upon completion of these minimum requirements, the diesel generator was restarted and operated satisfactorily, including a test run at 100% loaded conditions.

The minimum requirements needed to start the diesel generator have now been documented in a checklist (other than the list in the Plant Operating Procedures) identifying required support systems and valve positions. This checklist has been distributed to the appropriate plant operating personnel.

This is considered an isolated instance considering the number of times the diesel generator has been run. Current Plant Operating Procedures, established communications between Shift Personnel and Startup Engineers, and the methodology of testing should preclude recurrence of this condition in the future.

COMMONWEALTH OF PENNSYLVANIA :

SS:

COUNTY OF PHILADELPHIA :

JOSEPH W. GALLAGHER, being first duly sworn, desposes  
and says:

That he is Manager, Engineering and Research  
Department of Philadelphia Electric Company, the holder  
of Construction Permit CPPR-106 for Limerick Generating  
Station - Unit 1; that he has read the foregoing  
Response to Inspection Report No. 50-352/84-16 and  
knows the contents thereof; and that the statements and  
matters set forth therein are true and correct to the  
best of his knowledge, information and belief.

RECEIVED  
JUL 10 1984

Joseph W. Gallagher

Subscribed and sworn to  
before me this 6<sup>th</sup> day  
of July 1984

Patricia D. Scholl

PATRICIA D. SCHOLL

Notary Public, Philadelphia, Philadelphia Co.

My Commission Expires February 10, 1986