

APPENDIX A

NOTICE OF VIOLATION

Philadelphia Electric Company
Limerick Unit 1

Docket No. 50-352
License No. NPF-39

During an NRC inspection conducted on March 15, through April 25, 1992, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1992), the violation is listed below:

Limerick Technical Specification 6.8.1.d. requires that written procedures be established, implemented and maintained to cover surveillance and test activities of safety-related equipment. Step 7.1.b. of local leak rate test ST-4-LLR-092-1, Revision 0, "Feedwater," directs the test personnel to return the valves listed in the Tag Accountability Log to their as-found position, unless otherwise directed by shift supervision. The as-found positions are established and recorded in step 6.3.1.a. of the test.

Contrary to the above, on March 26, 1992, during the performance of step 7.1.b. of procedure ST-4-LLR-092-1, reactor water cleanup valve 44-1029 was improperly positioned to the locked open position instead of to the required as-found position of closed. This occurred when the test personnel operated the valve without ascertaining what the as-found position was, as required by the test procedure. The misposition resulted in draining about 13,000 gallons of water from the reactor cavity.

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

Pursuant to the provisions of 10 CFR 2.201, Philadelphia Electric Company 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 receipt of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken to avoid further violations; and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

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