

U.S. NUCLEAR REGULATORY COMMISSION
Region I

Report No. 50-352/84-34
Docket No. 50-352
License No. CPPR-106 Priority -- Category B
Licensee: Philadelphia Electric Company
2301 Market Street
Philadelphia, Pennsylvania 19101
Facility Name: Limerick Generating Station, Unit 1
Inspection At: Limerick, Pennsylvania
Inspection Conducted: June 25-29, 1984
Inspector: J. S. Hodson 8/11/84
J. S. Hodson, Reactor Engineer date
Approved By: C. J. Anderson 8/3/84
C. J. Anderson, Chief, Plant Systems Section date
Engineering Protection Branch, DETP

Inspection Summary: Inspection on June 25-29, 1984 (Inspection Report Number 50-352/84-34)

Areas Inspected: A routine unannounced inspection of pre-operational testing activities of safety-related heating, ventilation, and air conditioning systems. The inspection involved 30 inspection hours onsite by one region-based inspector.

Results: No violations were identified.

Region I Form 12
(Rev. February 1982)

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DETAILS

1.0 Persons Contacted

1.1 Philadelphia Electric Company (PECO)

- * J. M. Corcoran, Field QA Branch Head
- R. C. Dyer, Quality Assurance Engineer
- * C. R. Endriss, Regulatory Engineer, Electric Production
- * G. Leitch, Station Superintendent
- J. Spencer, PECO Startup

1.2 Bechtel Power Corporation

- * R. Bulchis, Resident Project Engineer
- D. Condliff, HVAC Group Supervisor
- G. Hall, Startup Engineer
- V. Kluge, Startup Engineer
- G. Kraft, Startup Engineer
- * W. L. McCullough, Project Startup Engineer
- E. Neasham, HVAC Group Supervisor
- E. Rink, Startup Engineer

1.3 US Nuclear Regulatory Commission

- * J. Wiggins, Senior Resident Inspector (Operations)
- * S. Chaudhary, Senior Resident Inspector (Construction)
- * H. Kister, Projects Branch Chief, Region I

During the course of the inspection, additional Bechtel and PECO personnel were contacted as required.

* Denotes personnel present at exit meeting.

2.0 Facility Tour

The inspector observed work activities in progress, completed work and construction status in several areas of the plant during a general inspection of Unit 1. The inspector examined work items for obvious defects and noncompliance with NRC requirements or licensee commitments. Particular note was taken of indications of quality control activities through visual evidence such as inspection records, and nonconformance and acceptance tags. Specific work activities and completed work observed by the inspector included HVAC installation and HVAC preoperational testing.

No violations were identified.

3.0 Heating, Ventilation and Air Conditioning (HVAC)

3.1 Preoperational Test Program

The inspector reviewed the HVAC preoperational test program with PECO and Bechtel. Preoperational testing is performed by Bechtel personnel under the direction of PECO. A PECO startup engineer is assigned responsibility for the system tested. Another qualified PECO engineer is required to witness the testing. No preoperational testing is allowed to proceed without the presence of this qualified PECO individual or his express permission to carry on without him. This individual is also required to initial each test page that he witnesses. In addition to the above parties, system air balancing is performed by Eastern Air.

The inspector reviewed test procedures, testing and/or test results for the following systems.

- P30.2 - Control Enclosure Chilled Water
- P28.1 - Diesel Generator Enclosure HVAC
- P32.2 - Control Room Isolation and Purge
- P34.2 - Refueling Area HVAC
- TT 1.10A-0 - Preliminary Air Balance
- TT 1.10B-0 - Final Air Balance

Based upon a review of the test procedures and test results, the inspector expressed a concern over the excessive number of test change notices (TCN's) written for some tests. This excessive number of TCN's makes it difficult to follow the test process and to evaluate the test results.

The licensee responded that a revision to administrative procedure AD8.3P, "Preoperational Test Implementation", had recently been issued. A primary purpose of this revision was to reduce the number of test change notices by only requiring TCN's for major test exceptions, i.e., those that effect scope or acceptance criteria. For those tests already performed, the licensee will issue a test summary report which will summarize the test results and categorize the TCN's. If the test results can not be satisfactorily summarized, the testing may be performed again.

No violations were identified.

3.2 HVAC Installation

During the facility tour, the inspector reviewed the HVAC installation for cleanliness and obvious defects or non-compliance with NRC requirements or licensee commitments. The following areas were reviewed:

- Diesel Generator Enclosure
- Reactor Building
- Auxiliary Building

No violations were identified.

4.0 Exit Meeting

The inspector met with the licensee and contractor representatives (denoted in Paragraph 1.0) at the conclusion of the inspection on June 29, 1984. The inspector summarized the scope and the inspection findings. At no time during this inspection was written material provided to the licensee.