

APPENDIX A

NOTICE OF VIOLATION

Philadelphia Electric Company
Limerick Generating Station, Unit 1

Docket No. 50-352
License No. NPF-27

As a result of the inspection conducted on January 1 - 31, 1985 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. Technical Specification 6.8.1 requires that procedures be maintained to implement the requirements of NUREG 0737, Item I.C.6.

Administrative Procedure A-41, the procedure for the control of safety-related equipment, implements Item I.C.6 of NUREG 0737 and requires that, prior to removal of safety-related equipment from service for maintenance, permission to release the affected equipment shall be granted by shift supervision.

Contrary to the above, on January 23, 1985, safety-related equipment was removed from service without permission being granted by shift supervision in that, during performance of maintenance activities controlled by maintenance request form 8501192, the Loose Parts Monitoring system was rendered inoperable in that the alarms on all its modules were defeated, without first obtaining the permission of the shift supervisor.

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

- B. 10 CFR 50.59 states that changes to procedures described in the safety analysis report can be made without prior Commission approval provided these changes do not involve an unreviewed safety question.

Final Safety Analysis Report (FSAR) sections 2.2.3 and 6.4 describe the analyses used to demonstrate that the control room would remain habitable after accidents which involve releases of radiation, chlorine or toxic gas. These sections indicate that a positive air pressure is assumed to exist within the control room to limit air leakage into the control room during the initial stages of the above described accidents.

FSAR section 9.4.1.2.2 and Figure 9.4-1 describe the procedures for operation of the control room heating, ventilating and air conditioning (HVAC) system such that a positive air pressure in the control room would be maintained.

Contrary to the above, between about 9:30 a.m. and 11:30 a.m., January 24, 1985, the procedures for operation of the control room HVAC system were changed, such that a positive air pressure was not being maintained, without prior Commission approval and without an evaluation to demonstrate that the effects of this change on the control room habitability analyses did not involve an unreviewed safety question.

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 to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be 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 this response time.

DCS Nos.:

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