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On January 30, 1985, at approximately 5:15 p.m., with Unit 1 in the startup condition and at 3.5 percent power, the feed breakers for the blowers and heaters in the Main Steam Isolation Valve-Leakage Control System (MSIV-LCS) were observed to be open during an NRC inspection. Technical Specification 3.6.1.4 requires the MSIV-LCS be operable during startup condition. With the feed breakers open, the operability of the MSIV-LCS was in question. The breakers had been left open in accordance with Surveillance Test ST-6-040-320-1. The cause of this event was the result of a discrepancy between system operating procedures and ST-6-040-320-1. Upon identification, the breakers were closed. ST-6-040-320-1 was revised to require the breakers be placed in the closed position at the completion of the surveillance test.

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NRC FOR 304A	LICENSEE EVENT REPORT (LER) TEXT CONTINUESTICAL												-	# NO 3150-0104			
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# Description of the Event:

On January 30, 1985, at approximately 5:15 p.m., with Unit No. 1 in the startup condition and at 3.5 percent power, during an NRC inspection, it was identified that the breakers for the blowers and heaters in the Main Steam Isolation Valve-Leakage Control System (MSIV-LCS) subsystems were open. Technical Specification 3.6.1.4 requires two independent MSIV-LCS subsystems be operable when the plant is in the startup condition. With the feed breakers open, the operability of the MSIV-LCS was in question. The breakers had been left in the open position in accordance with the Surveillance Test, ST-6-040-320-1, following performance of the Surveillance Test on December 27, 1984. The feeds to the blowers and heaters in the MSIV-LCS were closed upon identification by the NRC inspectors.

# Consequences of the Event:

The M3IV-LCS is a manually initiated system following a Loss of Coolant Accident (LOCA). Special Event procedure SE-10 for a LOCA directs the operator to actuate the MSIV-LCS, but does not specifically direct how. In order to do so, the operator must use the MSIV-LCS startup procedures, S40.1.A and S40.1.B, which specifically direct the operator to close all system feed breakers including those which had been left open as the result of performing ST-6-040-320-1.

#### Cause of the Event:

The cause of the event was the result of a discrepancy between the system operating procedures and Surveillance Test ST-6-040-320-1.

The feed breakers for the blowers and heaters had been closed as a result of performing the checkoff lists for system procedures \$40.3.A and \$40.3.B. Subsequently, on December 27, 1984, \$T-6-040-320-1 was performed which required that the feed breakers be left in the open position. The breakers were not repositioned since there was no cause to re-perform system procedures \$40.3.A and \$40.3.B.

NRC Form 366A (9-83)	LICENSEE EVENT REPORT (LER) TEXT CONTINUATION  APPROVED OM EXPIRES: 8/31/										
FACILITY NAME (1)		DOCKET NUMBER (2)		LER	NUMBER (6)			PAGS (3)			
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### Corrective Actions:

Upon identification of the open blower and heater feed breakers, they were immediately closed. Special Event procedure SE-10 was revised to specifically reference system procedures S40.1.A and S40.1.B in order to startup the MSIV-LCS. ST-6-040-320-1 was revised to require the feed breakers to be repositioned to the closed position at the completion of the Surveillance Test.

# Previous Similar Occurrences:

None.

# PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-400 arch 12, 1985

Docket No. 50-352

Document Control Desk U.S. Nuclear Regulatory Commission Washington, DC 20555

SUBJECT:

Licensee Event Report Limerick Generating Station - Unit 1

This LER concerns the apparent inoperability of the Main Steam Isolation Valve-Leakage Control System.

Reference:

Docket No. 50-352

Report Number: 85-022

00

Revision Number:

January 30, 1985

Event Date: Report Date:

March 12, 1985

Facility:

Limerick Generating Station P.O. Box A, Sanatoga, PA 19464

This LER is being submitted pursuant to the requirements of 10 CFR 50.73(a)(2)(vi). The delayed submittal of this report was the result of an ongoing investigation concerning this event which we expected to resolve prior to the due date of this LER. We regret any inconveniences the delay may have caused.

Very truly yours,

W. T. Ullrich

Superintendent Nuclear Generation Division

growellich

cc: Dr. Thomas E. Murley, Administrator, Region I, USNRC J. T. Wiggins, Senior Site Inspector See Service List

Judge Helen F. Hoyt cc: Judge Jerry Harbour Judge Richard F. Cole Troy B. Conner, Jr., Esq. Ann P. Hodgdon, Esq. Mr. Frank R. Romano Mr. Robert L. Anthony Ms. Phyllis Zitner Charles W. Elliott, Esq. Zori G. Ferkin, Esq. Mr. Thomas Gerusky Director, Penna. Emergency Management Agency Angus Love, Esq. David Wersan, Esq. Robert J. Sugarman, Esq. Martha W. Bush, Esq. Spence W. Perry, Esq. Jay M. Gutierrez, Esq. Atomic Safety & Licensing Appeal Board Atomic Safety & Licensing Board Panel Docket & Service Section (3 Copies) James Wiggins Timothy R. S. Campbell