

JAN 25 1985

Docket No. 50-352

License No. CPPR-106

Philadelphia Electric Company  
ATTN: Mr. S. L. Daltroff  
Vice President, Electric Production  
2301 Market Street  
Philadelphia, PA 19101

Gentlemen:

Subject: Inspection No. 50-352/84-57

This refers to your letter dated January 7, 1985, in response to our letter dated December 10, 1984.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:

*R. Bellamy*

*for* Thomas T. Martin, Director  
Division of Engineering and  
Technical Programs

cc:

V. S. Boyer, Senior Vice President, Nuclear Power  
John S. Kemper, Vice President, Engineering and Research  
G. Leitch, Station Superintendent  
Troy B. Conner, Jr., Esquire (Receives All 2.790 Information)  
Eugene J. Bradley, Esquire, Assistant General Counsel  
Limerick Hearing Service List  
Public Document Room (PDR)  
Local Public Document Room (LPDR)  
Nuclear Safety Information Center (NSIC)  
NRC Resident Inspector  
Commonwealth of Pennsylvania

OFFICIAL RECORD COPY

RL50-352/84-57 - 0001.0.0  
01/16/85

8502060434 850125  
PDR ADOCK 05000352  
G PDR


1/16/85

JAN 25 1985

bcc:  
 Region I Docket Room (with concurrences)  
 Senior Operations Officer  
 Section Chief, DPRP  
 P. Eselgroth, Shoreham, SRI  
 Section Chief, TPS, DRS  
 Marie Miller, DETP

RI:DETP  
 Nimitz/ms

  
 RI:DETP  
 Passiak

  
 RI:DETP  
 Bellamy

1/21/85

1/21/85

1/23/85

REN

OFFICIAL RECORD COPY

RL50-352/84-57 - 0002.0.0  
 01/16/85

Limerick Hearing Service List

Judge Helen F. Hoyt  
Atomic Safety and Licensing  
Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Judge Richard F. Cole  
Atomic Safety and Licensing  
Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Judge Jerry Harbour  
Atomic Safety and Licensing  
Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Atomic Safety and Licensing  
Appeal Panel  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Mr. Frank R. Romano  
61 Forest Avenue  
Ambler, Pennsylvania 19002

Mr. Robert L. Anthony  
Friends of the Earth of  
the Delaware Valley  
P.O. Box 186  
103 Vernon Lane  
Moylan, PA 19065

Mr. Marvin I. Lewis  
6504 Bradford Terrace  
Philadelphia, PA 19149

Phyllis Zitner  
LER  
P.O. Box 761  
Pottstown, PA 19464

Docketing and Service Station  
Office of the Secretary  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Ann P. Hodgdon, Esq.  
Benjamin H. Vogler, Esq.  
Counsel for NRC Staff  
Office of the Executive  
Legal Director  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Atomic Safety and Licensing  
Board Panel  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Philadelphia Electric Company  
ATTN: Edward G. Bauer, Jr.  
Vice President &  
General Counsel  
2301 Market Street  
Philadelphia, PA 19101

David Wersan, Esq. Consumer  
Assistant Advocate  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, PA 17120

Steven P. Hershey, Esq.  
Community Legal Services,  
Inc.  
Law Center  
North Central Beury Bldg.  
3701 North Broad Street  
Philadelphia, PA 19140

Angus Love, Esq.  
101 East Main Street  
Norristown, PA 19401

Mr. Joseph H. White, III  
15 Ardmore Avenue  
Ardmore, PA 19003

Charles W. Elliott, Esq.  
Brose and Postwistilo  
1101 Building  
11th & Northampton Street  
Easton, PA 18042

Robert J. Sugarman, Esq.  
Sugarman & Denworth Suite  
101 North Broad Street  
Center Plaza - 16th Floor  
Philadelphia, PA 19107

Director, Pennsylvania  
Emergency Management Agency  
Basement, Transportation  
and Safety Building  
Harrisburg, PA 17120

Thomas Y. Au, Esq.  
Assistant Counsel  
Commonwealth of Pennsylvania  
DER  
505 Executive House  
P.O. Box 2357  
Harrisburg, PA 17120

Martha W. Bush, Esq.  
Kathryn S. Lewis, Esq.  
City of Philadelphia  
Municipal Services Bldg.  
15th and JFK Blvd.  
Philadelphia, PA 19107

Thomas Gerusky, Director  
Bureau of Radiation  
Protection  
Department of Environmental  
Resources  
5th Floor, Fulton Bank Bldg.  
Third and Locust Streets  
Harrisburg, PA 17120

Spence W. Perry, Esq.  
Associate General Counsel  
Federal Emergency  
Management Agency  
500 C Street, S.W., Rm. 840  
Washington, D.C. 20472

Jay M. Gutierrez, Esq.  
U.S. Nuclear Regulatory  
Commission  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

Troy B. Conner, Jr., Esquire  
Mark J. Wetterhahn, Esquire  
Conner & Wetterhahn  
1747 Pennsylvania Ave  
Washington, D.C. 20006

U.S. Nuclear Regulatory Commission  
ATTN: Mr. J. T. Wiggins  
Senior Resident Inspector  
P.O. Box 47  
Sanatoga, PA 19464

# PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-5001

SHIELDS L. DALTROFF  
VICE PRESIDENT  
ELECTRIC PRODUCTION

January 7, 1985

Docket No. 50-352

Mr. Thomas T. Martin, Director  
Division of Engineering and Technical Programs  
U.S. Nuclear Regulatory Commission  
Region I  
621 Park Avenue  
King of Prussia, PA 19406

Dear Mr. Martin:

Your letter of December 10, 1984, forwarded the results of Inspection No. 50-352/84-57 which cited an activity at our Limerick Generating Station which did not appear to be in full compliance with NRC requirements. This apparent violation is restated below followed by our response.

## Finding

10 CFR 50, Appendix B, states in Criterion V, "Activities affecting quality shall be prescribed by documented instructions, procedures or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures or drawings. Instructions, procedures or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished". Limerick Generating Station Quality Assurance Plan is written to comply with 10 CFR 50, Appendix B, and reiterates, in Section 5.1, the requirements of Criterion V and specifies that they be implemented.

Contrary to the above, at sometime between March 23, 1984 and October 10, 1984, an activity involving the removal and re-installation of bolts or nuts for access doors to ducts and plenum of the safety related Control Room Emergency Ventilation System, was performed without procedures appropriate to the circumstance. As a result of this activity, the system was not properly restored as evidenced by the following access doors which were found on October 10, 1984 to have missing or loose bolts and/or nuts:

DPE 8501236353

<u>Access Door Location</u>	<u>Bolts or nuts missing or loose</u>
Between HV-020E and HV-020D	4 of 8
Between PD-C 013A and HV-010A	3 of 8
Between HV-010E and PD-C 013E	1 of 8
Between IV-020C and HV-020A	1 of 8
Upstream of heaters for OBE-192	1 of 4

This is a Severity Level IV violation, (Supplement II)

#### RESPONSE

This violation was the result of the failure to completely implement existing procedures. Startup Administrative Procedures AD6.4 "Startup Work Order" (SWO) and AD6.11 "Startup Work Authorization" (SWA) require that the scope of work be properly described and Quality Control (QC) "Hold Points" and "Witness Points" be established.

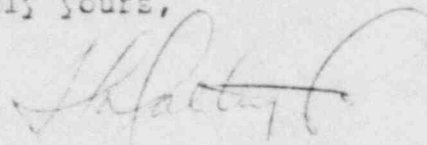
In this case, it appears that work on the Heating, Ventilating and Air Conditioning (HVAC) isolation valve actuators required the removal of the access doors. The SWO's/SWA's for performing this work did not clearly indicate that the access doors were to be removed. As a result of this oversight, the reinstallation of access doors was not properly identified as requiring QC inspection.

The missing nuts and bolts referenced above were replaced and closures were inspected to verify correct installation. An inspection of various elevations and areas throughout the reactor building and the control enclosure was performed to determine if a generic problem existed or if this was an isolated occurrence. This inspection, which covered approximately 80% of the Q-listed ducts containing access doors, revealed one missing nut and one broken stud not previously identified. To prevent recurrence the Engineering & Research Quality Assurance Field Branch Head issued a Notice to the applicable groups performing work at LCS to re-enforce QA Program requirements. Shortly after this problem was identified by the NRC, responsibility for these systems was transferred to the Plant Staff from the Startup organization.

Consequently, work that had been controlled by the Startup Administrative Manual and procedures is now being controlled by the Plant Administrative Procedures. In addition, Electric Production QC has established a program of routine monitoring of housekeeping through the use of Quality Control Instructions (QCI) that include LGS-QCI-008 which requires the verification that closures are properly installed and any loose or missing parts are identified. This monitoring is presently performed three times a week.

Should you have any questions or require further information, please contact us.

Very truly yours,

A handwritten signature in cursive script, appearing to read "J. T. Wiggins", is written over the typed name in the signature block.

cc: Dr. T. E. Murley, Administrator  
Mr. J. T. Wiggins, Senior Resident Inspector  
See Service List

cc: Judge Helen F. Hoyt  
Judge Jerry Harbour  
Judge Richard F. Cole  
Judge Christine N. Kohl  
Judge Gary J. Edles  
Judge Reginald L. Gotchy  
Troy B. Conner, Jr., Esq.  
Ann P. Hodgdon, Esq.  
Mr. Frank R. Romano  
Mr. Robert L. Anthony  
Ms. Phyllis Zitzer  
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  
James Wiggins  
Timothy R. S. Campbell