

APPENDIX A

NOTICE OF VIOLATION

Philadelphia Electric Company
Limerick Generating Station, Unit 1

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

During a control room log review conducted on January 16, 1985, the NRC Senior Resident Inspector noted an entry in the Unit 1 Reactor Operator's log that indicated that the power supply feeder breakers to two reactor water cleanup system containment isolation valves were open for seven minutes. The feeder breakers to these two valves were opened to avoid an automatic isolation of the suction line for the reactor water cleanup system during performance of a surveillance test. With the feeder breakers to both valves open at the same time, the associated containment penetration was left without an operable valve capable of automatically isolating the penetration in response to accident conditions. This condition was contrary to requirements of Technical Specification 3.6.3.

The safety impact of this violation, when it occurred, was minimal because the time duration involved was short, the operator was cognizant of the situation regarding the two valves involved, and the amount of fission products available in the core for release was small. However, we are concerned that this violation occurred as a result of an apparent weakness in the control exercised by senior-licensed supervisors over the activities of their licensed reactor operators. Consequently, to emphasize our concern and to address the need for corrective actions in this area to prevent recurrence of similar problems, the following violation is being issued:

Technical Specification 3.6.3 requires that the containment isolation valves listed in Table 3.6.3-1 be maintained operable at all times. However, power operations may continue for up to four hours with one or more containment isolation valve inoperable provided at least one containment isolation valve is maintained operable for each containment penetration.

Contrary to the above, between 9:20 a.m. and 9:27 a.m., January 15, 1985, power operations were in progress, but at least one containment isolation valve was not maintained operable for containment penetration number 014 in that the power supply feeder breakers to the operators for valves HV44-1F001 and HV44-1F004 were open

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

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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.

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Judge Richard F. Cole
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