

SEP 18 1992

Docket Nos. 50-352  
50-353

Mr. D. M. Smith  
Senior Vice President - Nuclear  
Philadelphia Electric Company  
Nuclear Group Headquarters  
Correspondence Control Desk  
P. O. Box 195  
Wayne, PA 19087-0195

Dear Mr. Smith:

SUBJECT: EXAMINATION REPORT NO. 50-352/353/92-21 (OL)

During the weeks of July 20, 1992, and July 27, 1992, the NRC administered initial examinations to employees of your company who had applied for licenses to operate the Limerick Unit 1 & 2 facilities. The evaluation addressed areas important to public health and safety and were conducted in accordance with Revision 6 (1/1/91) to NUREG-1021, "Operator Licensing Examiner Standards." The purpose of the evaluation is the examination of the individual operators to determine if they would satisfy the regulatory requirement of passing an NRC administered examination prior to license issuance. At the conclusion of the examinations, the preliminary findings were discussed with those members of your staff identified in the enclosed report.

The test results indicate that twelve of thirteen applicants passed the examination and were well prepared for the examinations. One Limited Senior Reactor Operator also passed a retake of the operating examination section B. Your staff is commended for their cooperation during the examination preparation and administration. Sections 3 and 4 of the enclosed report contain additional details of the applicants' performance and the NRC Examiners' observations.

As a result of this examination, we identified an apparent deviation from commitments made in response to NRC Bulletin No. 88-07 Supplement 1, which dealt with core thermal hydraulic instabilities. A revision to two plant procedures removed any reference to APRM peak to peak oscillations and periodic LPRM upscale or downscale alarms. These indications are used to monitor for thermal hydraulic instabilities. If they exceed certain criteria, a manual reactor scram must be inserted in order to prevent violating the Minimum Critical Power Ratio (MCPR), a safety limit. You are requested to respond to the enclosed Notice of Deviation (Appendix A), and you should follow the instructions in the attached notice.

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We also identified two other problem areas. First, the possibility exists for LPCI to initiate while drywell spray is in service, resulting in potential Residual Heat Removal pump runout and system degradation. Second, there appears to be a connection between simulator deficiencies and repeated operator performance weaknesses in prioritization of Emergency Operating Procedure actions. We request your attention to these two matters.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter and the enclosed report will be placed in the NRC Public Document Room. The responses requested by this letter are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Public Law No. 96-511.

Should you have any questions regarding this information, please contact Richard Conte at (215) 337-5210.

Sincerely,

*Original Signed by*

Lee H. Bettenhausen, Chief  
Operations Branch  
Division of Reactor Safety

Enclosures:

1. Appendix A, Notice of Deviation
2. Examination Report No. 50-352/353/92-21(OL)  
w/Attachments 1 - 5

Attachments:

1. RO Examination and Answer Key
2. SRO Examination and Answer Key
3. Facility Comments on Written Examination (w/o references) and NRC resolution
4. Simulator Facility Report
5. Exit Attendees

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cc w/enclosures; w/o Attachments 1 - 5:

R. Charles, Chairman, Nuclear Review Board  
D. R. Helwig, Vice President - Limerick Generating Station  
G. J. Beck, Manager - Licensing Section  
G. Madsen, Regulatory Engineer - Limerick Generating Station  
Secretary, Nuclear Committee of the Board  
Public Document Room (PDR)  
Local Public Document Room (LPDR)  
Nuclear Safety Information Center (NSIC)  
NRC Resident Inspector  
Commonwealth of Pennsylvania

cc w/enclosures and Attachments 1 - 5:

V. Cwietniewicz, Superintendent of Training  
J. Kantner, Training Manager  
Public Document Room (PDR)  
Local Public Document Room (LPDR)  
Nuclear Safety Information Center (NSIC)

bcc w/enclosures; w/o Attachments 1 - 5:

Region I Docket Room (with concurrences)  
R. Gallo, Chief, OLF, NRR  
R. Lobel, EDO  
R. Clark, NRR  
L. Bettenhausen, DRS  
E. Wenzinger, DRP  
C. Anderson, DRP  
R. Conte, DRS  
A. Burritt, DRS  
T. Fish, DRS  
S. Hansell, DRS  
K. Shembarger, Reactor Engineer, RIII  
M. Daniels, Examiner, Sonalyst  
OL Facility File  
DRS Files (2)

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bcc w/enclosures and Attachments 1 - 5:  
Master Exam File

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