

APPENDIX A

NOTICE OF DEVIATION

Philadelphia Electric Company
Limerick Units 1 and 2

Docket Nos. 50-352/353
Licensee Nos. DPR-39/85

During an NRC examination conducted from July 20 through July 29, 1992, a deviation from your written commitments made in response to NRC Bulletin No. 88-07, Supplement 1, was identified. In accordance with the, "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1992), the deviation is listed below:

In response to NRC Bulletin No. 88-07, Supplement 1, licensee letter dated March 7, 1989, states that Philadelphia Electric Company committed that the General Electric interim stability recommendations were completed and implemented for Limerick Unit 1 and would be used for the operation of Unit 2. The following conditions for evidence of thermal hydraulic instabilities were incorporated into the approved plant procedures:

"Average power range monitor (APRM) peak to peak oscillations greater than 10% or periodic local power range monitor (LPRM) upscale or downscale alarms in addition to the guidance provided in SIL 380, Revision 1."

Contrary to the above, Procedures OT-104, "Unexpected/Unexplained Reactivity Insertion," and OT-112, "Recirculation Pump Trip," were revised on June 12, 1992, such that it substantially changed so APRM peak to peak oscillations greater than 10% or periodic LPRM upscale or downscale alarms are not now considered evidence of instability.

Please provide to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555 with a copy to the Regional Administrator, Region I and a copy to the NRC Resident Inspector within 30 days of the date of this Notice, the reasons for the deviation, the corrective steps which have been taken and the results achieved and the corrective steps which will be taken to avoid further deviations, and the date when your corrective action will be completed. Where good cause is shown, consideration will be given to extending the response time.

Dated at King of Prussia, PA
this 18th day of Sept 1992