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February 26, 1985

Mr. Thomas E. Murley, Director
United States Nuclear Regulatory Commission
Office of Inspection and Enforcement, Region I
631 Park Avenue
King of Prussia, PA 19406

Subject: USNRC IE Region I Letter dated January 25, 1985
RE: Site Inspection of September 17 - 21, 1985
Inspection Report No. 50-352/84-53
Limerick Generating Station - Unit 1

File: QUAL 1-2-2 (352/84-53)

Dear Mr. Murley:

In response to the subject letter regarding items identified during the subject inspection of construction activities authorized by NRC License No. CPPR-106, we transmit herewith the following:

Attachment I - Response to Appendix A

Should you have any questions concerning these items, we would be pleased to discuss them with you.

Sincerely,

JW Gallagher
for
J Kemper

JPE/drd/840621/2

Attachment

Copy to: Director of Inspection and Enforcement
United States Nuclear Regulatory Commission
Washington, DC 20555

J. Wiggins, USNRC Resident Inspector

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ATTACHMENT I
RESPONSE TO APPENDIX A

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VIOLATION

As a result of the inspection conducted on September 17-21, 1984, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violation was identified (three examples):

- A. 10 CFR 50, Appendix B, Criterion V states, in part, that:
"Activities affecting quality shall be prescribed by documented instruction...and shall be accomplished in accordance with these instructions."
1) Section 6.3, 3rd paragraph, Wire and Cable Notes and Details, No. E-1412, sheet 6.5, revision 9, states, in part, that: "A minimum separation distance of 6 inches shall be maintained between class IE wiring.

Contrary to the above on September 18, 1984, safety class IE, Division I (Red) and Division III (blue) cables entering the bottom of control panel 10C601 were identified as not meeting the separation requirements of E-1412.

- 2) Section 5.13 of Conduct and Cable Tray Notes Symbols and Details, No. E-1406, sheet 5.2.1, revision 3, states, in part, that: "Entrances for cable into the top of equipment from cable trays shall be sealed for dust and debris.

Contrary to the above on September 18, 1984, cable entry ports in top of panel 10C601 were not sealed as required by E-1406.

- 3) Section 5.3 of Administrative Procedure No. AD6.8.4 requires that an orange tag be used for field identification of temporary modifications and that the tag contain necessary information to ensure verification and inspection of removal and restoration is controlled.

Contrary to the above, on September 20, 1984 temporary tags used to identify field wiring used for communication during testing did not contain necessary information to ensure verification or removal and restoration of original configuration.

RESPONSE

The following corrective actions have been completed.

- 1) The wiring entering control room panel 10C601 has been properly spaced and protected to meet the separation requirements. Also, the wiring entering through the floor openings of each of the other Unit 1 and common panels were inspected from both the top (control room side) and the bottom (cable spreading room side) and reworked as necessary. It appears that the cause of the inadequate separation was the installation of the fire barrier sealing material. The fire seal installation took place after the inspections of the cable separation and the installation of the "damming" for the floor seals. The actual sealing activity was the cause of these cables moving slightly thereby violating the separation criteria.

For Unit 2, another separation inspection

after the installation of the fire barrier sealing material will be added to prevent further occurrences of this condition. Provision for this inspection shall be established prior to the initiation of the penetration sealing program.

2. It was the interpretation of dust seal requirement that the alarm cabinets mounted on top of the control room cabinets served the purpose of preventing dust and debris from entering. However, it is agreed that a separate dust cover is a good idea and the drawing E-1406 has been revised to show this cover.

Dust barriers have been installed on panel 10C601 and on the tops of the other Unit 1 and Common control room panels.

As a result of the cover now being a requirement on drawing E-1406 these same barriers will be installed on Unit 2 to prevent a recurrence of this.

3. The temporary communication wiring identified and the balance of the temporary communication wiring used during the pre-operational testing has been removed.

To prevent a recurrence, the individuals in the organization responsible for this temporary wiring have been trained in the controls for temporary installations.

In addition to the temporary communication wiring, other temporary wiring has been installed to support the startup testing phase. An inspection and identification, rework or removal of this cable is expected to be completed by June 1, 1985. Additional training has been accomplished to re-enforce the existing procedural and design requirements. The need for a revision to the existing controls is being evaluated and will be completed and implemented simultaneously with the completion of the field work, June 1, 1985.