

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-352/84-62

Docket No. 50-352

License No. CPPR-106

Licensee: Philadelphia Electric Company

2301 Market Street

Philadelphia, Pennsylvania 19101

Facility Name: Limerick Generating Station, Unit 1

Inspection At: Limerick, Pennsylvania

Inspection Conducted: October 15-19, 1984

Inspectors:	<u><i>P. Bissett</i></u>	<u>11/5/84</u>
	P. Bissett, Reactor Engineer	date
	<u><i>M. Dev</i></u>	<u>11/5/84</u>
	M. Dev, Reactor Engineer	date
	<u><i>P. K. Eapen</i></u>	<u>11/6/84</u>
	P.K. Eapen, Lead Reactor Engineer	date
	<u><i>E.T. Shaub</i></u>	<u>11-6-84</u>
	E.T. Shaub, Reactor Engineer	date
Approved by:	<u><i>J. Spraul</i></u>	<u>11-6-84</u>
	J. Spraul, Acting Chief, MPS, DETP	date

Inspection Summary: Inspection on October 15-19, 1984 (Inspection Report No. 50-352/84-62)

Areas Inspected: Routine unannounced inspection by region-based inspectors of the transfer of plant systems from start-up group to plant staff and licensee action of previous inspection findings. The inspection involved 140 inspection hours onsite by four inspectors.

Results: No violations were identified.

DETAILS

1. Persons Contacted

Philadelphia Electric Company (PECo)

- W. Barnshaw, Shift Superintendent
- * R. Burtovich, System Transfer Coordinator
- * D. Clohecy, Quality Assurance Engineer (QAE)
- * J. Corcoran, Field QA Branch Head
- J. Cotton, Maintenance Engineer
- J. Doering, Operations Engineer
- P. Duca, Technical Engineer
- C. Endriss, Regulatory Engineer
- * E. Firth, Training Coordinator
- * G. Gilibody, QAE
- * C. Harmon, QAE
- * E. Hilditch, Document Administrative Center Supervisor
- * G. Leitch, Plant Superintendent
- * A. MacAinsh, QA Supervisor
- J. Monughan, Shift Superintendent
- * J. Phillabaum, Engineer
- W. Traux, Shift Superintendent

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- * R. Borchardt, Reactor Engineer
- * M. Gaudino, Reactor Engineer
- * J. Spraul, Acting Chief, Management Programs Section
- * J. Wiggins, Senior Resident Inspector

- * Denotes those present at the exit meeting on October 19, 1984

The inspector also interviewed operators, technical personnel, and administrative personnel during the course of the inspection.

2. Action on Previous Inspection Findings

(Closed) Open Item (352/84-31-01): Establish a training program for the site modification coordinator and his staff. In addition to the station-engineer course, the licensee has developed required reading lists for the modification coordinator and his staff. The reading includes sections of the FSAR, 10 CFR 50, ANSI standards, administrative procedures, Engineering and Research Department procedures, and INPO guidelines. In addition, training sessions were conducted by the modification coordinator to discuss plant modifications.

Documentation of completed required reading assignments was reviewed by the inspector and found to be acceptable.

This item is closed.

(Closed) Open Item (352/84-31-02): Review and improve the requirements for implementing a minor modification prior to PORC approval. The procedure, "Control of Plant Modifications," has been revised to allow only nonsafety-related minor modifications to be implemented prior to PORC approval, and these only if approved by two permanent PORC members and so documented on the Modification Proposal Form.

Based on above the above, this item is closed.

(Closed) Open Item (352/84-31-03): FSAR section 17.2A.II, item g, needs to be revised to be consistent with FSAR section 17.2B.II, item h. The inspector reviewed the approved Licensing Document Change Notice FS-671, which changes FSAR section 17.2A.II, item g, to be consistent with FSAR section 17.2.B, item h. Both sections now contain identical requirements for design verification by immediate supervisors. This change will be incorporated into the next annual FSAR update.

This item is closed.

(Closed) Open Item (352/84-31-04): Administrative procedure A-26, "Corrective Maintenance Program," addressed the major areas of the maintenance program specified in ANSI N18.7-1976 with the following exceptions:

- 1) Criteria for determining if the equipment, structure or component is safety related, environmentally qualified and a Class IE electrical component have not been addressed
- 2) Definition of what documents will constitute the completed work package
- 3) Further definition of the maintenance trending effort and the use of "Champs" for trending is required

Administrative procedures A-26, Revision 4, and A.25.1, "Preventive Maintenance Program," Revision 1, were reviewed. The inspector verified resolution for the 3 exceptions noted in that they are now adequately addressed in the maintenance program.

This item is closed.

(Closed) Open Item (352/84-31-05): Maintenance division administrative procedures and certain standard work instructions (SWI) need to be revised to address Limerick station activities.

The current revision of the maintenance division administrative procedures and SWIs 4, 5, 10, 16, 17, 21, 25 and 30 were reviewed. The inspector verified these procedures address Limerick activities as applicable.

This item is closed.

(Closed) Open Item (352/84-39-01): Complete Phase III training for non-licensed operators (NLO). Completion of the Phase III training requires the NLOs to complete a personally assigned Practical Factors Manual. Of the 36 NLOs, all but five (two Plant Operators and three Auxiliary Operators) have successfully completed the assigned Practical Factors Manual. The completed manuals were reviewed by the inspector. Also, to evaluate the performance and the effectiveness of the NLO training program, eight NLOs (three Plant Operators, one Auxiliary Plant Operator, and four Auxiliary Operators) were requested to simulate the performance of several practical factors that were included in their Practical Factors Manual. Those practical factors selected included such systems/components as the diesel generators, chlorination system, control rod drive system, static inverter, safeguard piping fill system, condensate system, 500 KV substation, cooling tower, turbine lube oil and radwaste systems. Each NLO demonstrated satisfactory knowledge and performance of those evaluations covering the above listed systems/components. For those five NLOs who have yet to complete their Practical Factors Manual, the licensee has committed that these individuals will not be permitted to perform any technical specification-related evolutions unless 1) accompanied by a qualified NLO of the same level or higher or 2) the individual has completed his NLO Practical Factors Manual.

Based on the above review and independent verifications by the inspector, this item is closed.

3. Transfer of Systems from Startup Group to Plant Staff

Administrative procedure A-220, Revision 3, governs the transfer of pre-operationally tested systems from the Startup Director to the Assistant Station Superintendent. This procedure requires independent system reviews by the Operations Engineer, Technical Engineer, Maintenance Engineer, Health Physicist and Senior Chemist. The inspector reviewed the transfer packages for the following systems with station personnel to determine the effectiveness of the system transfer:

1. Reactor Core Isolation Cooling System
2. Core Spray System
3. High Pressure Coolant Injection System
4. Reactor Protection System

Review of the above systems indicated that the startup group completed open items on the startup work list (SWL) to a level acceptable for system transfer to the plant staff.

The transfer packages were complete and prepared in accordance with the guidelines of startup administrative procedure AD 6.1. The plant staff conducted an indepth interdepartmental review of the transfer document and identified exceptions prior to the transfer. Open items from the SWL and

new items generated by the interdepartmental reviews were entered in the plant systems completion list for prompt followup and closeout. The transfers were conducted in a controlled manner. The level of supporting documentation for interdepartmental reviews, however, varied considerably from review group to review group.

PECo's QA division recently completed an audit (AL-84-60) to review the implementation of administrative procedure A-220. This audit identified the following concerns:

1. All open preoperation test exceptions were not included in the SWL.
2. Maintenance request forms were not issued to address all open SWL items at the time of transfer
3. Temporary circuit alteration forms were not issued to cover all open temporary startup modifications.

The audit focused on transfer details at the System Transfer Coordinator's level. Emphasis was placed on the adequacy of the transfer packages prepared by the Startup Director and followup of open items identified prior to and during the transfer process.

Based on the above, the inspector concluded that the transfer of systems from the Startup Director to the Assistant Station Superintendent was generally being conducted in accordance with the administrative procedure A-220 and that corrective action had been or would be taken to resolve the concerns identified by PECO's QA division.

4. Exit Meeting

The inspector met with the licensee representatives (denoted in paragraph 1) on October 19, 1984 to summarize the scope and findings of the inspection.

At no time during the inspection was written material provided to the licensee by the inspectors.