

PHILADELPHIA ELECTRIC COMPANY

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SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

March 1, 1985

Docket No. 50-352

Mr. Richard W. Starostecki
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Starostecki:

Your letter of February 1, 1985 forwarded Inspection Report No. 50-352/85-08 for Limerick Generating Station Unit 1 which addresses one item which apparently was not in full compliance with the Nuclear Regulatory Commission requirements. This item is restated below along with our response:

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 valves 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 operator for valves HV44-1F001 and HV44-1F004 were open.

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

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Response

This event is discussed in your inspection report and in Limerick Generating Station Unit 1 Licensee Event Report No. 85-006, submitted February 19, 1985.

As a result of defects associated with the Riley Temperature switches causing spurious ESF actuations, the supervisors, in an attempt to prevent unnecessary system isolations directed that the electrical feed to the isolation valves be opened, one at a time. Actions were promptly taken to correct the problem which resulted primarily from a lack of clear communication between the supervisor and the reactor operator. The individuals involved in this event were interviewed and counseled regarding the need to properly communicate in a clear unambiguous fashion.

A design change was developed and a modification was issued to allow the temperature monitoring switches to be operated without operating the containment valves.

Interim measures taken to prevent recurrence of this event were as follows:

- 1) Issuance, on a daily basis of temporary procedure changes (TPC) to the surveillance test, ST-6-107-590-1, "Daily Surveillance Log/OPCONS 1, 2, 3," to provide detailed operator instructions for removing the feed to one isolation valve at a time.
- 2) Posting of an operator aid on the appropriate panel in the auxiliary equipment room which directs the operators to render only one isolation valve at a time inoperable per Technical Specification 3.6.3.
- 3) Issuance of a memorandum to the operating shifts to review the requirements of Technical Specification 3.6.3.

The modification to the "READ" circuit of the Riley temperature switch, including surveillance testing and calibration of the switches to correct the difficulties associated with the generation of spurious isolation signals was completed February 14, 1985.

Additional corrective action measures taken to prevent recurrence included:

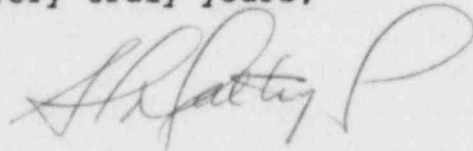
- 1) An additional 24 hours of Limerick Generating Station specific Technical Specification training has been included in the requalification training cycle for reactor operators, senior operators, shift technical advisors, and shift advisors to

enhance the familiarity of the operators with the Limerick Generating Station Technical Specification requirements. Additionally, each of the above individuals have been issued his own copy of the Technical Specifications.

- 2) Control room log review requirements are being modified to provide clarification of control room log review by the shift superintendent, the shift supervisors, and the shift technical advisor. These requirements are in proposed Revision 2 to Administrative Procedure A-7, which is anticipated to be PORC approved by March 22, 1985.
- 3) The Daily Surveillance Logs for OPCONS 1, 2, and 3 and for OPCONS 4 and 5 were reviewed to determine the adequacy of the procedural guidance incorporated within them. It was determined that no procedural changes are required.
- 4) An operational excellence program has been instituted.

Should you have any questions or require additional information, please do not hesitate to contact us.

Very truly yours,



cc: J. T. Wiggins, Site Inspector
See Service List

cc: Judge Helen F. Hoyt
Judge Jerry Harbour
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1/16/85