

PHILADELPHIA ELECTRIC COMPANY

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GRAHAM M. LEITCH
VICE PRESIDENT
LIMERICK GENERATING STATION

July 17, 1992

Docket Nos. 50-352
50-353
License Nos. NPF-39
NPF-85

Mr. T. T. Martin, Administrator
U. S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

SUBJECT: Limerick Generating Station, Units 1 and 2
Response to Request for Information Concerning Fire
Watch Activities

Dear Sir:

On June 10, 1992, we received NRC letter dated June 8, 1992, requesting information concerning specific fire watch activities at the Limerick Generating Station (LGS). The letter requested that the results of our review and disposition of this matter be submitted to Region I within 30 days of the date of receipt of the letter. A seven (7) day extension was granted by Mr. J. Lyash, of Region I, on July 8, 1992. This letter provides the results of our investigation and disposition of the matter. As requested in the letter of June 8, 1992, this response does not contain personal privacy, proprietary, or safeguards information.

The identified concern is that fire watch personnel assigned to monitor ongoing welding near the "41 line" in the Unit 2 Turbine Enclosure were leaving the area while the welding continued. This is contrary to the requirements of Administrative (A) procedure A-12, "Ignition Source Control Procedure." The personnel involved in this activity were most likely the contractors working for the Installation Section to install the Unit 2 Deep Bed Demineralizer modification in the Unit 2 Turbine Enclosure.

We have investigated this concern and similar fire watch activities at LGS and have concluded that welding, or other ignition source work controlled by procedure A-12 did not continue in the absence of the fire watches. We did, however, discover discrepancies between the times that the individuals were logged into the plant areas as tracked by the security computer and the fire watch sign-in and sign-out times documented on the ignition source log sheets. Random sampling of the ignition source documentation was performed by Quality Assurance and

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site personnel, and included the organizations that performed ignition source work between January 1992 and July 1992. The organizations were: the Nuclear Maintenance Division (NMD), the site Maintenance Section, and the contractors working for the Installation Section and the Maintenance Section. The types of discrepancies identified were as follows.

1. Time differences of less than 10 minutes between the security computer time and the time entered by the fire watch on the log.

The cause of these discrepancies is differences between the security computer time and the watches used by the workers. This has been determined to not be a procedure non-compliance concern and no corrective actions are necessary.

2. Fire watch personnel left and returned to the work area without signing off and signing back on to the ignition source log sheets.

3. Time differences of greater than 10 minutes between the security computer time and the time entered by the fire watch on the log.

The cause of these last two discrepancies has been determined to be personnel error due to lack of full understanding of the requirements of procedure A-12. Interviews of individuals involved in the fire watch activities indicated that they understood the general requirements of the procedure but either, 1) forgot to sign out and sign back in, 2) believed that they could leave the area if no ignition source work occurred, or 3) believed that they could sign in on the log sheet during work preparations before entering the work area. Although the fire watches received training on procedure A-12, the results of the interviews revealed that there is an apparent lack of understanding of the documentation requirements, in particular, the importance of strict adherence to the requirements with respect to signing in and out on the log. It was evident that the workers did understand the intent of procedure A-12; to provide dedicated fire watch coverage during ignition source work and for the thirty (30) minutes following completion of the ignition source work.

Follow-up discussions with the fire watches and the ignition source workers, and further security zone traces identified that while the fire watches were away from the work area, no welding or other ignition source work controlled by procedure A-12 was performed until a fire watch returned to the work location and the fire watch remained posted for the thirty (30) minutes following completion of the ignition work.

None of the ignition source workers interviewed were aware of any instances where an ignition source fire watch left the work area while ignition source work was in progress. There is no evidence to support any deliberate violations or willful falsification of documentation.

As a result of the identified discrepancies, the Installation Section, utilizing site Fire Protection personnel, has performed retraining of the craftsmen working for both Installation Section contractor and a follow-up review of newly issued ignition source log sheets to verify compliance. Since the retraining, no additional discrepancies involving the Installation Section contractors have been identified. A Maintenance Training Bulletin (MTB) is being developed by site Maintenance Section and site Fire Protection personnel to provide retraining on procedure A-12 of the remaining ignition source works who work at LGS. The MTB will be issued to supervisors of ignition source workers and fire watches in the site Maintenance Section, the site Maintenance Section contractor, and the NMD. The supervisors will discuss the MTB with the appropriate personnel.

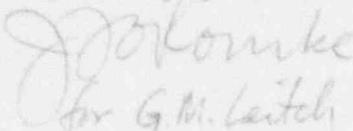
Long term corrective actions include a review, and revision if necessary of procedure A-12 to human factor the procedure and provide clarification of the documentation requirements. The training programs involving the ignition source workers and fire watches will be reviewed to determine whether clarification is needed in the training related to procedure A-12.

In addition to viewing the ignition source fire watch activities, a review of the Technical Specifications (TS) required fire watch activities was performed. A review of selected TS fire watch patrols conducted between April 17, 1992 and May 10, 1992 was performed and the data was compared to the security computer data. The information documented by these firewatches was verified to be accurate.

In summary, as a result of our investigation, minor instances of procedure non-compliances were identified, however, we have concluded that no ignition source work was performed without an ignition source fire watch, and that there was no intentional violation of procedural requirements or falsification of documentation.

If there are any additional questions regarding this matter, please do not hesitate to contact us.

Very truly yours,


for G. M. Latch

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