

DEC 04 1992

Docket Nos. 50-352  
50-353

Mr. D. M. Smith  
Senior Vice President - Nuclear  
Philadelphia Electric Company  
Nuclear Group Headquarters  
Correspondence Control Desk  
Post Office Box 195  
Wayne, Pennsylvania 19087-0195

Dear Mr. Smith:

SUBJECT: ELECTRICAL DISTRIBUTION SYSTEM FUNCTIONAL INSPECTION OF  
LIMERICK GENERATING STATION, UNITS 1 AND 2, COMBINED  
REPORTS NO. 50-352/92-81 AND 50-353/92-81

This letter transmits the report of the team inspection conducted by Mr. A. L. Della Greca and other NRC and contractor personnel, from August 31 to October 2, 1992, at the Corporate Offices and at the Limerick site. Mr. Della Greca discussed the findings of the inspection with G. V. Cranston and J. Doering of your staff, on October 2, 1992. Several findings were further discussed with W. J. Boyer and other members of your staff on October 6 and 8, 1992. In addition, clarifications regarding violations were provided on October 9, 1992.

The primary objective of the inspection was to determine whether the Limerick electrical distribution system, as designed, installed and configured, was capable of performing its intended safety functions. In addition, an assessment of engineering and technical support relative to the electrical distribution system was performed.

The inspection was directed toward areas important to public health and safety. Areas examined during this inspection are discussed in the enclosed inspection report. Within these areas, the inspection consisted of selective examinations of design calculations, relevant procedures and representative records, installed equipment, interviews with personnel, and observations by the inspectors. The inspection concluded that, for the areas reviewed and taking into consideration the compensatory actions regarding bus transfers, the design implementation of the electrical distribution system at Limerick is acceptable and that the engineering organizations provide adequate technical support for the safe operation of the plant. A number of strengths, observations and unresolved items, as detailed in the enclosed report, were also identified.

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Based upon the results of this inspection, four of your activities appeared to be in violation of NRC requirements. Three of these activities, pertaining to the dc loading calculations and to the surveillance testing of dc batteries, and degraded voltage relays are as set forth in the Notice of Violation, enclosed herewith as Appendix A. The violations have been categorized by severity level in accordance with the General Statement of Policy and Procedure for NRC Enforcement Actions, 10 CFR Part 2, Appendix C. You are required to respond to the Notice of Violation and, in preparing your response, you should follow the instruction in Appendix A.

The fourth activity involved your potential noncompliance with the requirements of general design criterion (GDC) 17 and possibly GDC 35. The issue was the result of the control logic used to automatically transfer the accident loads to the alternate and standby power sources in the event of a loss of the preferred source. The NRC is concerned that the safety and regulatory significance of this issue was not recognized by your safety review committees when it was initially identified and no appropriate corrective actions were taken until this issue was identified by the NRC EDSFI team. The NRC is considering this apparent violation for escalated enforcement action in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy), 10 CFR Part 2, Appendix C (1992). Accordingly, no Notice of Violation is presently being issued for this inspection finding.

An enforcement conference to discuss this apparent violation has been tentatively scheduled for January 6, 1993, in the NRC Region I office. The purposes of this conference are to discuss the apparent violation, its causes and safety significance; to provide you the opportunity to point out any errors in our inspection report; to provide an opportunity for you to present your proposed corrective actions and actions taken; and to discuss any other information that will help us to determine whether enforcement action in accordance with the Enforcement Policy is appropriate.

Pertaining to this apparent violation, at the enforcement conference, you should be prepared to discuss (1) your compliance with the independence requirement of GDC 17 and the single failure requirement of GDC 35; (2) the causes which led to the design deficiencies; (3) whether the emergency buses and, hence, the safeguards components were inoperable during any period of time prior to the corrective actions of October 5, 1992; (4) adequacy of your safety review committees' evaluation as it pertains to the electrical bus transfer scheme problem, following its identification in 1989 during your Independent Design and Construction Assessment; and (5) adequacy of the corrective actions thereof.

You will be notified by separate correspondence of the results of our deliberations on this matter. Please be advised that the characterization of the apparent violation described in the enclosed report may change as a result of further NRC review. No response regarding this apparent violation is required at this time.

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In addition to the above deficiencies, the team identified six issues which require further evaluation by you. We request that you provide us, in writing, within 60 days from the date of receipt of this letter, with a schedule for the resolution of the other unresolved issues identified to you at the exit meeting and in this report. The sections of the report which address the specific findings are identified in the table titled "Summary of Inspection Findings."

Your cooperation with us in this matter is appreciated.

Sincerely,

Original Signed By:  
Marvin W. Hodges

Marvin W. Hodges, Director  
Division of Reactor Safety

Enclosures:

1. NRC Notice of Violation, Appendix A
2. NRC Combined Inspection Report No. 50-352/92-81 and 50-353/92-81

cc w/encl:

R. Charles, Chairman, Nuclear Review Board  
D. R. Helwig, Vice President - Limerick Generating Station  
G. J. Beck, Manager - Licensing Section  
G. Madsen, Regulatory Engineer - Limerick Generating Station  
Secretary, Nuclear Committee of the Board  
Public Document Room (PDR)  
Local Public Document Room (LPDR)  
Nuclear Safety Information Center (NSIC)  
K. Abraham, PAO (2)  
NRC Resident Inspector  
Commonwealth of Pennsylvania

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bcc w/encl:

Region I Docket Room (with concurrences)

E. Wenzinger, DRP

C. Anderson, DRP

DRS/EB SALP Coordinator

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R. Clark, NRR

W. Lanning, DRS

R. McBrearty, DRS

bcc w/Executive Summary Only:

C. Hehl, DRP

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C. Miller, PDI-2, NRR

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