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A UNIT OF PECO ENERGY

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May 8, 1997

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

Mr. Hubert J. Miller, Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19484

SUBJECT: Limerick Generating Station - Units 1 and 2
Request for Withholding of an Investigation Report

Dear Mr. Miller:

By letter dated November 13, 1996, PECO Energy provided the NRC with a copy of an internal investigation report that addressed alleged instances of record falsification at Limerick Generating Station. The letter and its attached affidavit requested that the report be withheld from public disclosure in accordance with the provisions of 10CFR2.790. By letter dated April 10, 1997, the NRC responded to the request by determining that only certain information could be withheld from public disclosure, and that there was insufficient bases for withholding the entire report. As a result, the NRC requested that PECO Energy forward a version of the investigation report within 60 days that has "bracketed" the specific information sought to be withheld. We understand that the NRC intends to place a redacted version of the report in the Public Document Room.

Accordingly, enclosed is a bracketed version of the investigation report. The bracketed information is considered confidential information, the disclosure of which would constitute an unwarranted invasion of the personal privacy of the individuals involved. The confidential information is being submitted to the Commission with a request that it be withheld from public disclosure in accordance with Section 2.790(a)(6) of the Commission's Regulations. Attached is an affidavit setting forth the reasons in support of this request to withhold from public disclosure.

If you have any additional questions, please contact us.

Very truly yours,

Attachment
Enclosure

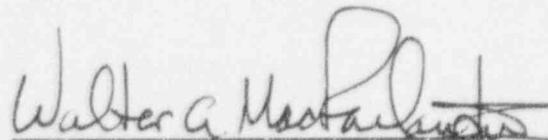
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COMMONWEALTH OF PENNSYLVANIA
COUNTY OF MONTGOMERY

SS.

Walter G. MacFarland, IV, being first duly sworn, deposes and states as follows:

1. I am Vice President, Limerick Generating Station of PECO Energy Company, licensee under Facility Operating Licenses NPF-39 and NPF-85, and I am duly authorized to execute this affidavit.
2. The information requested by the NRC includes detailed information concerning an allegation of wrongdoing, identifies or could be used to identify the individuals involved in the allegation, and identifies or could be used to identify the individuals involved in the investigation of the allegation. I am familiar with the contents of the investigation report.
3. The information contained in the investigation report is of the type customarily held in confidence by PECO Energy Company and is not customarily disclosed to the public. The information has not been disclosed to the public and is not available from public sources. PECO Energy Company has limited the distribution of the information in the report to those individuals with a need to know to fulfill their legal and management responsibilities.
4. The bracketed information should be withheld from public disclosure by the NRC because such disclosure is not required in the public interest and such disclosure would constitute an unwarranted invasion of the personal privacy of not only the individuals directly involved in the investigation, but also those individuals who provided information or were identified in the course of the investigation.
5. Based upon the foregoing, PECO Energy Company has concluded that disclosure of the bracketed information contained in the investigation report would constitute an unwarranted invasion of the personal privacy of the individuals involved, would adversely affect the interests of the individuals involved and the interests of PECO Energy Company, and that such disclosure is not required in the public interest.

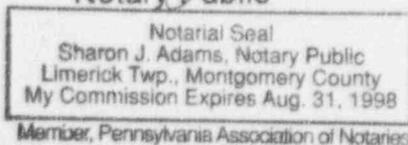


Walter G. MacFarland, IV
Vice President - LGS

Subscribed and sworn to
before me this 8th day
of May, 1997.



Notary Public



Location: Security, S9-1

Date: September 30, 1996

To: T. J. Niessen, Jr., Director
Nuclear Quality Assurance

From: J. C. Rullo, Manager-Security

Subject: **Security Investigation-Quality Concern 127**
Allegation of Falsification of Fire Protection Section
Surveillance Test, Limerick Generating Station

On August 12, 1996 an investigation was initiated at the request of Limerick Generating Station (LGS) management related to a Quality Concern alleging an employee of the LGS Fire Protection Section may have failed to properly perform a Surveillance Test.

On August 7, 1996 an allegation was received by management from an individual indicating the employee was not in the LGS plant a sufficient amount of time to perform the inspections necessary for Surveillance Test ST-7-022-951-0, titled: Fire Hose Station Visual Inspection, dated July 29, 1996.

A subsequent joint investigation involving the Security Division and the LGS Quality Division revealed the allegation to be correct and identified and confirmed additional falsifications of Surveillance Tests by the individual. The scope of the investigation also identified other unrelated irregularities involving Fire Protection Surveillance Tests by a _____ and a _____

A listing of the Surveillance Tests reviewed by the Quality Division and the specific areas of concern identified is attached.

The following reflects the specific information related to each individual identified through the course of the investigation:

was alleged to have failed to properly conduct Surveillance Test ST-7-022-951-0, titled: Fire Hose Station Visual Inspection, for which he signed indicating he satisfactorily performed on July 29, 1996. Specifically, was believed to have not been in the LGS plant long enough to conduct the Surveillance Test.

A preliminary investigation by Site Management determined had not entered the certain areas of the LGS Plant on July 29, 1996 necessary to complete the Surveillance Test as required.

was interviewed on August 13, 1996 and provided a written statement admitting he had annotated by signing his initials on the Surveillance Test in question, affirming on July 29, 1996 he visually observed the Fire Stations at all the LGS Plant locations as required by the Surveillance Test. During the course of the interview, admitted to not going to all the listed locations on the Surveillance Test on that date. provided information he annotated the inspections as completed on July 29, 1996, but that he had taken credit for previous observations he made on previous dates of the fire hose stations.

Management was advised of the interview results and on August 13, 1996, was suspended from employment and his unescorted access was suspended pending the results of the investigation.

Further investigation revealed irregularities in four previous Surveillance Tests conducted by failed to enter specific areas of the LGS Plant necessary to complete ST-7-022-951-0, titled: Fire Hose Station Visual Inspection, for which he signed, indicating he satisfactorily performed on April 3, 1995, June 8, 1995, April 30, 1996 and May 29, 1996.

was again interviewed on August 16, 1996 and provided a written statement admitting to not completing the four Surveillance Tests properly in that he was not in the areas required to observe the fire hose stations on the dates in question. admitted to signing the Surveillance Tests as performing them on the dates in question.

in the interview of August 16, 1996, provided a written statement regarding concerns he noted in the Fire Protection Group which he had surfaced previously to his coworkers, manager and director. As part of the investigation, the issues were reviewed and investigated by the Quality Division. Attached are the results of the Quality Division investigation.

Further investigation revealed an irregularity in an additional Surveillance Test conducted by [redacted] failed to enter a specific area of the LGS Plant necessary to complete ST-7-022-950-0, titled: Fire Suppression Water System (FSWS) Spray and Sprinkler Visual Inspection, for which he signed indicating he satisfactorily performed on June 28, 1995. This matter was not pursued with another interview of [redacted] as he had previously indicated other Surveillance Tests he performed may not have been completed properly.

On September 11, 1996 management terminated [redacted] employment.

The investigation revealed an irregularity in the portion of an Surveillance Test conducted by [redacted] failed to enter specific areas of the LGS Plant necessary to complete ST-7-022-952-0, titled: Fire Hose Station Refuel Inspection, dated: 8/23/95. The Surveillance Test reflects a signature by [redacted] indicating permission to start the test occurred on August 22, 1995 at 0930 hours. [redacted] again signed the Surveillance Test indicating he completed satisfactorily and performed on August 23, 1995 the portions of the Surveillance Test he initialed. Records indicate [redacted] was not in the required areas to perform the Surveillance Test on either of those dates.

[redacted] was interviewed on August 20, 1996 and provided a written statement admitting to not being in the areas necessary to perform the requirements of the Surveillance Test on the dates he annotated on the Surveillance Test. [redacted] offered two possible explanations for why he signed and dated the Surveillance Test as: he took credit for the inspections done that date by a coworker; or; he took credit for the fire hoses being recently replaced but did not visually inspect them on the dates he annotated on the Surveillance Test.

Management was advised of the interview results and suspended unescorted access pending completion of the investigation.

Further investigation determined the coworker named by _____ as having actually done the inspections had, in fact, not done the inspections. Also, the hose replacement he indicated he could have taken credit for occurred after, not before, the Surveillance Test was performed and included no hoses in the areas in question.

_____ contacted his management on August 21, 1996 and related he performed the Surveillance Test on a previous date, approximately one week earlier, but had annotated the wrong date on the Surveillance Test.

An investigation of the records indicates _____ was in the necessary areas of the LGS Plant to perform the Surveillance Test properly on August 19, 1995.

Management reinstated _____ unescorted access on September 4, 1996 pending a final determination.



The investigation revealed an irregularity in the portion of an Surveillance Test conducted by _____ was found not to have been in an area of the LGS Plant a sufficient amount of time necessary to complete a portion of ST-7-022-952-0, titled: Fire Hose Station Refuel Inspection, for which _____ signed indicating he satisfactorily performed on August 23, 1995.

_____ was interviewed on August 21, 1996 and provided a statement he does not recall the events of August 23, 1995, but believes he either did the inspection but rushed through it; was called away during the inspection to another matter, or took credit for someone else who may have told him they did the inspection.

Management was advised of the interview results and suspended unescorted access on August 21, 1996 pending completion of the investigation.

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September 30, 1996
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The investigation of records indicated _____ was in the area of the questionable test for no longer than one minute and fifty-nine seconds. A functional test performed as part of the investigation concluded a minimum of three minutes and eleven seconds was necessary to perform the test, and one minute and forty-five seconds to travel between the doors used as entrance and exit by _____ on the date in question. Further investigation showed _____ was not assisted by anyone on the date in question.

Management reinstated _____ unescorted access on September 4, 1996 pending a final determination by his employer.

lc

Attachments

cc: J. W. Durham
W. G. MacFarland, IV

Based on a review of PIMS, there were 119 Fire Protection Group Surveillance Tests identified as being performed between 1/1/95 and 8/12/96. Of these, 48 were Fire Hydrant Inspections, Fire Brigade Drills, Fire Pump & Back-up Fire Pump Operability tests and were not considered for review. Of the remaining 71 tests, 51 (71.8%) were selected for review based on equipment location and personnel access within the power block.

This review was conducted by comparing the surveillance test's signoffs and security card reader zone traces for test performers and associated IVORs to ensure that the individuals were actually in the equipment area for a reasonable amount of time required to perform the function.

Satisfactory at the Result for each test means that the identified personnel were in the appropriate areas for a reasonable length of time to adequately perform the task.

<u>Surveillance Test</u>	<u>Title</u>	<u>Date Completed</u>
ST-7-022-951-0 Rev.10 <i>Result:</i> satisfactory	Fire Hose Visual Inspection	1-27-95
ST-7-022-951-0 Rev.10 <i>Result:</i> satisfactory	Fire Hose Visual Inspection	2-28-95
ST-7-022-951-0 Rev.10 <i>Result:</i> no evidence of entry to the refuel floor	Fire Hose Visual Inspection	4-3-95
ST-7-022-951-0 Rev.10 <i>Result:</i> satisfactory	Fire Hose Visual Inspection	5-8-95
ST-7-022-951-0 Rev.10 <i>Result:</i> no evidence of entry to A8-304 (Fan Room) & A8-254 (Cable Spread Room)	Fire Hose Visual Inspection	6-8-95
ST-7-022-951-0 Rev.10 <i>Result:</i> satisfactory	Fire Hose Visual Inspection	7/5-6/95
ST-7-022-951-0 Rev.10 <i>Result:</i> satisfactory	Fire Hose Visual Inspection	8/4/95
ST-7-022-951-0 Rev.10 <i>Result:</i> satisfactory	Fire Hose Visual Inspection	9/5/95
ST-7-022-951-0 Rev.10 <i>Result:</i> satisfactory	Fire Hose Visual Inspection	10/6/95
ST-7-022-951-0 Rev.10 <i>Result:</i> satisfactory	Fire Hose Visual Inspection	11/6/95
ST-7-022-951-0 Rev.10 <i>Result:</i> satisfactory	Fire Hose Visual Inspection	12/5/95
ST-7-022-951-0 Rev.10 <i>Result:</i> satisfactory	Fire Hose Visual Inspection	1/3/96
ST-7-022-951-0 Rev.10 <i>Result:</i> satisfactory	Fire Hose Visual Inspection	2/1/96

Surveillance Test	Title	Date Completed
ST-7-022-951-0 Rev.10 Result:	Fire Hose Visual Inspection satisfactory	3/1/96
ST-7-022-951-0 Rev.10 Result:	Fire Hose Visual Inspection satisfactory	4/1/96
ST-7-022-951-0 Rev.10 Result	Fire Hose Visual Inspection 1) no evidence of entry to A8-200/180 2) no evidence of entry into Unit 1 Rx. Encl. although he accessed the refuel floor	4/30/96
ST-7-022-951-0 Rev.10 Result:	Fire Hose Visual Inspection 1) completed refuel inspection in 2 mins. (8 hose stations) 2) completed Unit 1 Rx. Encl. in 3 mins. (29 hose stations)	5/29/96
ST-7-022-951-0 Rev.10 Result	Fire Hose Visual Inspection satisfactory	6/27/96
ST-7-022-952-0 Rev.6 Result	Fire Hose Station Refuel Inspection individual was not in the area (A8-201/180) for a reasonable amount of time to perform a hose inspection	8/23/95
ST-7-022-953-0 Rev.6 Result:	Hose Cart Visual Inspection satisfactory	1/9/95
ST-7-022-953-0 Rev.6 Result:	Hose Cart Visual Inspection satisfactory	2/9/95
ST-7-022-953-0 Rev.6 Result:	Hose Cart Visual Inspection satisfactory	4/13/95
ST-7-022-953-0 Rev.6 Result:	Hose Cart Visual Inspection satisfactory	5/16/95
ST-7-022-953-0 Rev.6 Result:	Hose Cart Visual Inspection satisfactory	7/20/95
ST-7-022-953-0 Rev.6 Result:	Hose Cart Visual Inspection satisfactory	8/18/95
ST-7-022-953-0 Rev.6 Result:	Hose Cart Visual Inspection satisfactory	9/18/95
ST-7-022-953-0 Rev.6 Result:	Hose Cart Visual Inspection satisfactory	4/16/96
ST-7-022-953-0 Rev.6 Result:	Hose Cart Visual Inspection satisfactory	5/15/96
ST-7-022-353-0 Rev.4 Result:	Halon System Inventory satisfactory	3/5/96

Surveillance Test	Title	Date Completed
ST-7-022-353-0 Rev.4 Result:	Halon System Inventory satisfactory	7/31/95
ST-7-022-353-1 Rev.4 Result:	Halon System Inventory satisfactory (IVOR personnel initials are not identifiable)	7/15/96
ST-7-022-353-1 Rev.3 Result:	Halon System Inventory satisfactory	3/5/96
ST-7-022-353-1 Rev.3 Result:	Halon System Inventory satisfactory	7/31/95
ST-7-022-353-2 Rev.4 Result:	Halon System Inventory satisfactory	3/2/96
ST-7-022-353-2 Rev.4 Result:	Halon System Inventory satisfactory	2/4/96
ST-7-022-353-2 Rev.4 Result:	Halon System Inventory satisfactory	3/7/96
ST-7-022-353-2 Rev.4 Result:	Halon System Inventory satisfactory	7/31/95
ST-7-022-950-0 Rev.4 Result:	Fire Suppression Water System (FSWS) Spray and Sprinkler Visual Inspection no evidence of access to rooms 449, 450, 619 (cable spread room or fan room)	6/28/95
ST-7-022-950-1 Rev.0 Result:	Fire Suppression Water System (FSWS) Spray and Sprinkler Visual Inspection satisfactory	6/9/95
ST-7-022-950-2 Rev.1 Result:	Fire Suppression Water System (FSWS) Spray and Sprinkler Visual Inspection satisfactory	11/2/95
ST-7-022-921-1 Rev.3 Result:	Fire Damper Inspection satisfactory	2/26/96

Surveillance Test	Title	Date Completed
ST-7-022-921-0 Rev.4 <i>Result:</i> satisfactory	Fire Damper Inspection	8/7/96
<u>Work Process/Implementation:</u>		
* damper 017-001 on page 9, IVOR step was not signed off as being performed		
* during walkdown of FPDs in A8-239; identified incorrect room numbers listed on COL and no identification labeling on the FPD to ensure accurate identification (all are identified with black marker)		
ST-7-022-921-2 Rev.0 <i>Result:</i> satisfactory	Fire Damper Inspection	2/8/95
ST-7-022-323-2 Rev.4 <i>Result:</i> satisfactory	Halon System Operability Verification	1/29/95
ST-7-022-323-1 Rev.3 <i>Result:</i> satisfactory	Halon System Operability Verification	2/7/96
<u>Work Process/Implementation:</u>		
* The same person signed off as the Test Performer and the Management Reviewer		
ST-7-022-323-0 Rev.5 <i>Result:</i> satisfactory	Halon System Operability Verification	2/7/96
<u>Work Process/Implementation:</u>		
* The same person signed off as the Test Performer and the Management Reviewer		
ST-7-022-250-0 Rev.3 <i>Result:</i> satisfactory	FSWS Flow Test	6/12/95
RT-7-022-730-2 Rev.3 <i>Result:</i> satisfactory	BOP FSWS Air/Water Nozzle Flow Test	2/16/95
ST-7-022-730-0 Rev.3 <i>Result:</i> satisfactory	FSWS Air/Water Nozzle Flow Test	8/29/95
<u>Work Process/Implementation:</u>		
* Suggest performing a step by step review and verification of the above three tests to ensure accuracy (i.e., panel/valve/room numbers and locations) and adequacy.		

Surveillance Test	Title	Date Completed
ST-7-022-922-2 Rev.4	Fire Rated Penetration Test Sample Visual Inspection	2/2/95
Result:	satisfactory	
ST-7-022-922-0 Rev.5	Fire Rated Penetration Test Sample Visual Inspection	2/27/96
Result:	satisfactory	

General work process/implementation note:

Based on the ST reviews and zone trace comparisons, the majority of IVOR's required were performed by personnel entering and exiting an area/room at the same time as the performer. This raises a question on the integrity of the true independence of the IVOR performance. An Independent Verification (IV) is verification by a second qualified individual operating independently after the activity to verify that a specific condition exists. (See the Operations Manual Chapter OM-C-11.1 for IV guidelines and methods or reference A-C-33). Reinforcement of Management expectations on performance of IVORs should be communicated to all Fire Protection Group personnel to ensure conformance or pursue appropriateness of revising tests to Double Verifications (DV).

Rev.4 (9/9/96)

Evaluation & Review of the following concerns was performed by:

Concern #1 - Fire System Impairments (FSI) are in the reviewed stage not taken to complete. Also were they properly compensated?

Review Results - 23 of the 89 Fire System Impairments (FSIs) identified in March 1996 by IRM personnel were reviewed to determine if the required compensatory actions were taken. The FSIs found in the "REVWD" status can be placed into one of the following three categories; 1) Preventive maintenance activities deactivated and not performed 2) More than one work order activity required the same component removed from service at the same time and the duplicate FSI was not used 3) FSI implemented by Site Management and not taken to "INPROG" status.

The preventive maintenance activities that are in the "DEACT" status are activities that have been removed from the PM program. The work described in these work orders have not been performed and no impairment of a fire system was made.

In several cases multiple activities of the same work order would impair the same fire protection feature. A review of the completion remarks for the work order and a review of other FSIs created under that work order showed that shift management had reviewed the release of the fire protection feature and compensatory measures were in place. In all cases reviewed, a properly filled out FSI in the "COMPLT" status could be found in PIMS.

A report of FSIs in the "REVWD" status was obtained from maintenance planning. The report contained the shift supervision PIMS sign-offs when performed. A review of the report identified 22 FSIs in the "REVWD" status in which at least the shift supervision sign off was completed. Some of these FSIs had all initial locations completed indicating that the impairment had occurred and the system was returned to service without placing the FSI in the proper status. When the FSI is left in the "REVWD" status shift supervision would not review the impairment when determining compensatory actions for new impairments. Since this could lead to the improper compensatory actions being prescribed, the IRM generated PEP I0006009 to capture the issue.

The current FSI program provides the individual completing the work order activity with a message to close the FSI and requires that the enter key be pressed a second time. AG-CG-12.1 provides direction to the implementing organization to status the FSI as complete when the fire protection feature is returned to an operable status. The issue of timely FSI closure has been identified as a watch area in the Industrial Risk Management group self assessment.

Conclusion - Fire System Impairments (FSI) were identified to be in the reviewed stage and not taken to complete. In our opinion this condition has no safety significance. Computer programming enhancements should be made to assure FSIs are taken to the INPROG status prior to being worked and to assure FSIs are closed out when jobs are completed. Based upon PIMS review FSIs were identified to have been properly compensated.

Concern #2 - Not all sections of fire rated assemblies were being inspected such as carpeted areas or areas blocked by installed plant equipment.

Review Results - The TRM surveillance requirements section 4.7.7.1 (a) states that the exposed surfaces of each fire rated assembly shall be verified operable by performing a visual inspection once per 24 months. ST-7-022-920-0 is utilized to perform the visual inspection of the fire rated assemblies as required by the TRM. On August 22, 1996 IRM individuals familiar with the performance of the inspection were asked to describe their visual inspection technique. The test is performed by inspecting the visible sections of the fire rated assembly from the floor using flashlights and binoculars. Any permanent plant equipment, including carpeting, in the way of inspecting that section of the barrier are not removed for the inspection. Fire protection personnel from two plants in region I were contacted to discuss how they handle similar inspections. The LGS method of performing the inspection is consistent with other plants and is deemed to provide assurance that the barrier is intact.

The May 16, 1996 performance of ST-7-022-920-1 was performed for structural walls but section 6.2.3 inspection of fire rated raceways was not performed. The reason for not performing this section was that thermo-lag fire barriers were declared inoperable and compensatory actions were in place. The performance of this procedure should have been listed as a partial per A-3, "Temporary changes to approved procedures and partial procedure use". The use of this process ensures that only partial credit is given for the performed section of the procedures and the appropriate partial work order generated to track the completion of the procedure.

Conclusion - Fire rated assemblies that are not "exposed" are not required to be inspected.

Concern #3 - ST-7-022-730-1 (FSWS Air/Water Nozzle Flow Test) if performed as written it will dump the system.

Review Results - ST-7-022-730-1 has been written to satisfy the surveillance requirements of TRM 4.7.6.2 (d) to perform an air flow test which would verify that each sprinkler header system or open spray nozzle is unobstructed. There were two types of systems tested by ST-7-022-730-1 preaction systems which incorporate the use of closed sprinkler heads and the integrity of the piping is supervised using air pressure. The air is supplied from the plant air system through a regulator. When testing this type of system the high/low air pressure alarm is tested for both the high and low alarm points. The high pressure alarm is obtained by raising the system air pressure to a nominal 80 psig and verifying the alarm on the local release control panel. Low air pressure is then verified by opening the inspectors test valve to bleed off air pressure to the low alarm point while verifying airflow through the sprinkler header. This type inspection would verify that a flow path existed from the preaction valve to the inspectors test connection.

The other type of system tested are deluge water spray systems that incorporate the use of open spray nozzles. Two types of deluge valves are used in the design of the systems at LGS. Smaller systems used small hydraulically operated deluge valves that use fire system pressure to maintain the valve in the closed position. When testing these systems the outer block valves for the systems are closed and the alarm pressure switch is isolated from these systems. These actions would prevent the system from performing its design function. There are no plant impact statements in the test to warn shift supervision of the

change in status of the system or ensure that compensatory actions are maintained. The IRM has initiated I006033 to investigate plant impact of fire system tests.

1. Airflow is established for deluge system by routing air from a plant air hose outlet to the system drain or ball check valve. Once airflow is established airflow can be verified at the nozzles. The test prescribes three methods that can be used to check for airflow. Each of these methods require the tester to physically access the spray nozzles. Through discussions with IRM personnel it was determined that a pinwheel on a stick was used in determining airflow, which was not specifically described in the procedure. The use of a pinwheel would be equivalent to the three methods listed in the procedure.

While performing the walkdown of the test identifying all of the sprinkler heads without knowing the total number of heads installed in the area or the use of a design print was extremely difficult. To ensure accurate performance of the test specific guidance on identifying the heads should be given to the performer.

The description of alarms received on local panels and control room panels did not provide coordinate locations that would provide verification that the proper alarm window or panel light has activated. In the case of alarms on release control panel it could not be determined which light the test performer would expect to light during the test. A-C-1 APP.2 EXH.11 should be referenced for describing information in surveillance tests.

Conclusion - ST-7-022-730-1 (FSWS Air/Water Nozzle Flow Test) if performed as written will not dump the system. Plant impact statements should be included in the test to warn shift supervision of the change in status of the system and ensure that compensatory actions are maintained.

Concern #4 - Penetration seal surveillance test references incorrect drawings.

Review Results - Reviewed ST-7-022-922-2 rev. 5 attachment #1 "Penetration Inspection Data Sheet" requires a listing of penetration seal detail drawing numbers. Based upon review of the ST completed 2/27/96, seal area drawings were referenced instead of seal detail drawing numbers. The surveillance test contains inspection criteria to verify that damage has not occurred to the penetration seal. Concern was noted that if the seal installation detail is not reviewed by the test performer critical design parameters may be missing from the installation. The seal inspection test should ensure that degradation to the penetration seals have not occurred and that the visible seal parameters meet the tested configuration.

Conclusion - The penetration seal inspection procedure was performed as written in February 1996. In our opinion the test performed meets the intent of the Technical Requirement Manual (TRM). The test did not provide clear direction to use installation design details. The test does provide acceptance criteria that will identify physical damage to the penetration seals. We believe the test can be improved by ensuring that the test performer completely understands the visual parameters that are important to ensure the seal is bounded by a fire test. While addressing this issue SECY 96-146 should be referenced.

Concern #5 - Emergency Lighting - A procedure was not developed to direct lights toward emergency equipment.

Review Results - RT-6-108-300-2 rev.3, RT-6-022-108-300-0 rev. 4 and RT-6-108-300-1 rev.4 (Safe Shutdown Eight (8) Hour Self-Contained Battery Pack Operation Verification) all require the performer to verify that emergency lighting is directed towards required equipment for safe shutdown and access pathways. A walkdown was performed using RT-6-108-300-2 which was last performed by operations on July 30, 1996. During the walkdown the aiming of 24 emergency lighting units were evaluated. All lights were observed to be aimed in the area of the equipment identified in the procedure. When trying to assess the lighting in stair-towers and some general area lighting the test did not provide enough direction to accurately determine the proper aiming. This issue was discussed with IRM personnel who were aware of the need to better identify the appendix R lighting and produced an AT AITL type A/R A01034738 written in June of this year requesting engineering to identify the require safe shutdown lighting. The response to the A/R indicates that a revision to the test procedures and possibly plant drawings will be required.

Conclusion - In our opinion, procedural guidance is in place to require verification that emergency lighting is directed towards appendix R safe shutdown pathways and equipment.