



**PECO NUCLEAR**

A UNIT OF PECO ENERGY

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10 CFR 2.201

June 6, 1997

Docket No. 50-353

License No. NPF-85

U.S. Nuclear Regulatory Commission  
Attn.: Document Control Desk  
Washington, DC 20555

SUBJECT: Limerick Generating Station, Unit 2  
Reply to a Notice of Violation  
NRC Integrated Inspection Report Nos. 50-352/97-01 and  
50-353/97-01

Attached is PECO Energy Company's reply to a Notice of Violation for Limerick Generating Station, Unit 2, that was contained in your letter dated May 7, 1997. The violation concerned a modification that was made to the Unit 2 fuel preparation machines without an appropriate evaluation to determine if it would make the information in the Updated Final Safety Analysis Report (UFSAR) inaccurate or incomplete. The attachment to this letter provides a restatement of the violation followed by our reply.

If you have any questions or require additional information, please contact us.

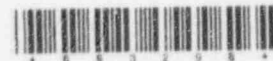
Very truly yours,

Attachment

cc: H. J. Miller, Administrator, Region I, USNRC  
N. S. Perry, USNRC Senior Resident Inspector, LGS

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Attachment  
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### Reply to a Notice of Violation

#### Restatement of the Violation

During an NRC inspection conducted during the period February 4 - March 29, 1997, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (60 FR 34381; June 30, 1995), the violation is listed below:

10 CFR 50.59 states, in part, that the holder of a license authorizing operation of a utilization facility may make changes in the facility as described in the safety analysis report, without prior Commission approval, unless the proposed change involves a change in the technical specifications incorporated in the license or an unreviewed safety question.

Limerick Generating Station procedure LR-C-13, 10 CFR 50.59 Reviews, Revision 6, (the procedure implementing 10 CFR 50.59), requires, in part, that activities shall be evaluated to determine if the activity will or does make information in the Safety Analysis Report (SAR) inaccurate or incomplete.

Contrary to the above, in January 1997, a modification was made to the Unit 2 fuel preparation machines that made the information in the SAR incomplete in that a test fixture was added, which caused the fuel to be raised closer to the water surface. This resulted in raising two spent fuel assemblies closer to the surface of the spent fuel pool than allowed by the Limerick Updated Final SAR, on February 4, 1997. The modification was not evaluated to determine if it would make information in the SAR inaccurate or incomplete.

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

### REPLY

#### Admission of the Violation

PECO Energy acknowledges the violation.

#### Reason for the Violation

During Limerick Generating Station (LGS), Unit 2 refueling outage 2R04, a test was performed by a vendor on two irradiated fuel assemblies placed in the fuel pool fuel preparation machines. The set-up for this test involved the addition of a test fixture to the base of the fuel preparation machine. This temporary

modification of the fuel preparation machine was performed without an evaluation to determine if it would make information in the SAR inaccurate or incomplete.

The organizations initiating the fuel service work failed to appropriately use administrative controls which require a detailed review of the activity, consideration for the need for the 10 CFR 50.59 review, and establishment of technical and quality requirements for the service including establishment of interfaces and responsibilities of PECO Nuclear and the vendor.

Additionally, personnel in the involved work groups did not employ a questioning attitude about the fuel inspection activity since the vendor was used frequently in the past without incident. This contributed to the less than adequate review of the details of the activity which contributed to the failure to recognize the need for the 10CFR50.59 Review.

#### Corrective Actions Taken and Results Achieved

The test equipment was removed from the fuel preparation machines. Administrative controls have been established to ensure that no work activities involving use of the fuel preparation machines with fuel inspection fixtures will be performed until procedure revisions for set-up and use of the fuel preparation machine, and training of involved work group personnel are complete.

The Fuel & Services Division has been identified as the overall responsible organization accountable for the review and oversight of the future inspections associated with the debris filter lower tie plates and the extended irradiation program.

A training bulletin has been issued to inform appropriate PECO Nuclear personnel about the fuel preparation machine incident and lessons learned. This bulletin reinforces the importance of using appropriate administrative controls for the purchase of services, the need for adequate work activity review and oversight when employing vendor services, and performing a review of work activities in accordance with procedure LR-C-13, "10CFR50.59 Reviews," as appropriate.

As a result of these actions, PECO Nuclear personnel have a heightened awareness of the need for adequate review and oversight of vendor activities.

#### Corrective Actions to Avoid Future Noncompliance

A continuing training lesson will be incorporated into Engineering Support Personnel Continuing Training Program to ensure appropriate engineering personnel are aware of the various plant processes by which a design change or a temporary modification can be reviewed and evaluated. Also, the responsibility to provide vendor work activity oversight will be discussed. This incident will be cited as an example of where a piece of equipment brought to the station by a vendor essentially as a "tool" actually constituted a change to the facility. This action will be completed by September 30, 1997.

The procedures for set-up and use of the fuel preparation machine will be revised to ensure that chain stop settings will maintain 7 feet water coverage over irradiated fuel assemblies. Procedures will include specific information and limitations to ensure use of only approved fuel inspection equipment. This action will be completed prior to the next expected use of the fuel preparation machines which is currently scheduled for June 30, 1997.

PECO Nuclear services requisition procedure and work order planning procedure will be reviewed, and revised as necessary, to ensure adequate methods are established for review and oversight of vendor activities. This action will be completed by August 29, 1997.

Training of Nuclear Maintenance Division engineers, Fuel Handling Directors, including Limited Senior Reactor Operators and Designated Alternates, and Refuel Platform Operators about the design and precautions for use of fuel inspection fixtures will be conducted. This action will be complete by October 3, 1997.

In addition, to maintain a heightened awareness of issues related to refuel floor operations, this incident and the lessons learned will be included in the next cycle of LGS licensed operator training. This training is expected to be completed by August 15, 1997.

Date When Full Compliance was Achieved

Full compliance was achieved on February 6, 1997 when the test fixtures were removed from the fuel preparation machines and the LGS Updated Final Safety Analysis Report limits for water shielding over fuel assemblies seated in the fuel preparation machine were established.