

ENCLOSURE 1

NOTICE OF VIOLATION

PECO Energy
Limerick Generating Station
Unit 2

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

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).

Pursuant to the provisions of 10 CFR 2.201, PECO Energy is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region I, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation; (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken to avoid further violations; and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may

be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at King of Prussia, PA
this 7th day of May 1997