

DEC 28 1987

Docket No. 50-352

License No. NPF-39

Philadelphia Electric Company
ATTN: Mr. J. W. Gallagher
Vice President
Nuclear Operations
2301 Market Street
Philadelphia, Pennsylvania 19101

Gentlemen:

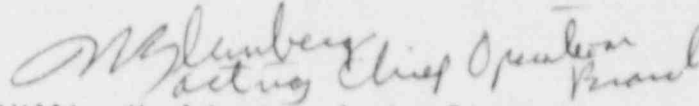
Subject: Inspection No. 50-352/87-25

This refers to your letter dated December 9, 1987, in response to our letter dated November 12, 1987.

Thank you for informing us of the corrective and preventive actions documented in your letter. We appreciate your timely actions in closing the 40 open Maintenance Request Forms (MRFs) and in revising Administrative Procedure A-26 to provide time requirements for closure of the MRF process. These actions will be examined during a future inspection of your licensed program.

Your cooperation with us is appreciated.

Sincerely,


William V. Johnston, Acting Director
Division of Reactor Safety

cc:

John S. Kemper, Senior Vice President, Engineering and Production
G. Leitch, Nuclear Generation Manager
J. Franz, Manager Limerick Generating Station
Troy B. Conner, Jr., Esquire
Eugene J. Bradley, Esquire, Assistant General Counsel
W. M. Alden, Engineer in Charge, Licensing Section
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
Commonwealth of Pennsylvania

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bcc:
Region I Docket Room (with concurrences)
Management Assistant, DRMA (w/o encl)
Section Chief, DRP
Robert J. Bores, DRSS

RI:DRS
Prell/ms

12/24/87

RI:DRS
Blumberg

12/24/87

RI:DRS
Gallo

12/24/87

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PHILADELPHIA ELECTRIC COMPANY

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December 9, 1987

Docket No. 50-352

Mr. Robert M. Gallo, Director
Chief Projects Branch No. 2
Region I
U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

SUBJECT: Response to Inspection Report No. 50-352/87-25

Dear Mr. Gallo:

Your letter dated November 12, 1987 forwarded Inspection Report No. 50-352/87-25 for Limerick Generating Station. Appendix A of the letter addressed an item which does not appear to be in full compliance with Nuclear Regulatory Commission requirements. The Violation is restated below, followed by our response.

Restatement of Violation

Technical Specifications Section 6.10, "Records Retention", requires that records of maintenance activities be retained.

A-26, Revision 12, "Procedure for Corrective Maintenance", Section 5.7 requires that completed work packages (Maintenance Request Forms (MRFs)) be reviewed by the I&C Engineer for completeness, signed off and entered into CHAMPS (an automated system for scheduling maintenance activities and monitoring equipment history) to show completion of the MRF and to enter the equipment history.

Contrary to the above, as of October 2, 1987, records of maintenance activities were inadequately maintained in that 16 MRFs which had been completed six months or longer had not received final review and signoff by the I&C engineer and 24 MRFs

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had not been entered into CHAMPS to show completion of the maintenance activity. Of these 40 open MRFs, a majority of which were safety related, CHAMPS indicated four MRFs were open over two years and 19 MRFs were open over one year.

This is a severity Level V violation (10 CFR 2, Appendix C, Supplement I) applicable to NPF-39.

Admission or Denial of Alleged Violation:

Philadelphia Electric Company acknowledges the violation.

Reason for the Violation:

Administrative Procedure A-26, Procedure for Corrective Maintenance, was inadequate in that it did not provide time requirements for the MRF closure process. Therefore, MRFs were not always expeditiously and completely closed.

Extent or Significance of Violation:

The inspection report identified a procedure deficiency that has not resulted in a significant problem. Forty MRFs were identified by the inspector as not properly closed. As stated in the notice of violation, 24 MRFs were found not closed on CHAMPS and the remaining 16 MRFs were completed six months or longer and had not received final review and signoff by the I&C Engineer.

Since the violation was specifically substantiated by a review of only I&C MRFs, a full review of MRF closure processing will be completed by January 8, 1988. Other areas for improving MRF processing are being identified and will be part of overall improvements to the MRF processing system.

Corrective Actions Taken and Results Achieved:

The 40 MRFs were closed in CHAMPS by October 19, 1987. The 24 MRFs complete except for CHAMPS closure were properly closed in CHAMPS. The remaining 16 MRF Packages were assembled, reviewed, signed off as complete, and closed on CHAMPS.

Corrective Actions to be Taken to Avoid Future Non-Compliance

A-26, Procedure for Corrective Maintenance, will be revised to require that all MRFs will be closed within 6 months

of shift supervision acceptance of the completed work or will be formally dispositioned and tracked. The revision of A-26 will be implemented by February 28, 1988. To provide information to management, on MRF closure processing, the following steps have been taken:

1. MRF status reporting has been incorporated into routine PORC meetings, scheduled biweekly.
2. MRF status reporting is now included in the Limerick Unit 1 Monthly Management Review Report to the Vice President.

Date When Full Compliance Was Achieved

By October 19, 1987 the 40 MRFs identified by the inspector had been closed in CHAMPS and sent to Nuclear Records Management.

Very truly yours,

JW Gallagher

Attachments

cc: Addressee
W. T. Russell, Administrator, Region I, USNRC
E. M. Kelly, Resident Site Inspector