

APPENDIX A

NOTICE OF VIOLATION

Philadelphia Electric Company
Limerick Generating Station, Unit 1

Docket No. 50-352
License No. NPF-39

As a result of the equipment qualification (EQ) inspection conducted on February 8-16, 1988, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy) (1986), the following violations were identified:

- A. 10 CFR 50.49 paragraph (f) requires each electrical equipment important to safety and located in a harsh environment to be qualified by testing, experience, or analysis based on type test data.

Contrary to the above, on February 12, 1988, while LGS unit 1 was in operation, the inspectors identified that:

1. The qualification of Rockbestos coaxial cable and special multi-conductor cable (EQ package #25), Rockbestos 600V power, control and instrumentation cables (EQ package #22), and Rockbestos thermocouple extension cable (EQ package #24) was not established at the time of the inspection in that the qualification test report was invalid because of problems identified in Information Notice 84-44 (inadequate QA program, test equipment not properly calibrated, test deficiencies and test anomalies improperly documented, and test documents improperly controlled).
2. The qualification of the unidentifiable cable splices associated with level transmitters LT-48-IN010-C and LT-48-IN010-G was not established in that no EQ file was available to support qualification of these splices.
3. The qualification of Amp Splice connectors (EQ package No. 194) was not established at the time of the inspection in that the qualification test documented in the EQ file did not demonstrate insulation resistance capabilities for the splice connectors during the simulated LOCA event (the splice connectors were not energized throughout the event, and were not touching each other or the electrical ground during the test).

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

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- B. 10 CFR 21.31 requires the procurement documents for non-commercial grade item to have the provisions of 10 CFR part 21 invoked on the vendor.

Contrary to the above, on February 12, 1988, the inspectors identified that purchase order LS224109 for a quantity of Amp PIDG terminals and butt splices which were ordered to IEEE nuclear environmental standards (non-commercial grade items) did not specify 10 CFR part 21 requirement.

This is a Level V violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, Philadelphia Electric Company is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and, (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.