

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Limerick Generating Station Unit 1	DOCKET NUMBER (2) 0 5 0 0 0 3 5 2 1	PAGE (3) 1 OF 0 4
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TITLE (4)  
Failure to Perform a Technical Specification Surveillance Requirement

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)		
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES		DOCKET NUMBER(S)
0	1	1986	86	006	01	0	5	1988			0 5 0 0 0
											0 5 0 0 0

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 8 (Check one or more of the following) (11)

OPERATING MODE (6) 4	<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.406(c)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)
	<input type="checkbox"/> 20.406(a)(1)(i)	<input type="checkbox"/> 50.38(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)
	<input type="checkbox"/> 20.406(a)(1)(ii)	<input type="checkbox"/> 50.38(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 356A)
	<input type="checkbox"/> 20.406(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)	
	<input type="checkbox"/> 20.406(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)	
<input type="checkbox"/> 20.406(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(x)		

LICENSEE CONTACT FOR THIS LER (12)

NAME Charles A. Mengers, Senior Engineer, Licensing Section	TELEPHONE NUMBER AREA CODE: 2 1 5   8 4 1   - 5 1   8 4
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)

<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)	<input checked="" type="checkbox"/> NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

Abstract: 86-006

On January 22, 1986 at 1200 hours, with the unit in cold shutdown to repair the #4 Main Turbine Control Valve, the fire protection assistant discovered that monthly Surveillance Tests 7-022-951-0 and 7-022-953-0 (fire hose station and hose cart visual inspections, respectively) did not meet the surveillance requirements of Technical Specifications 4.7.6.5.a and 4.7.6.6.a. The tests were required to be performed prior to January 19, 1986. Although all equipment was subsequently found to satisfy the surveillance test criteria, all technical specification fire hose stations and hose cart stations were considered administratively inoperable in accordance with the requirements of Technical Specification 4.0.3, during the time interval between January 19, 1986 and January 22, 1986. The cause of this event was inadequate communications among the Fire Protection group members and an inadequate supervisory overview of the surveillance test performance. Upon discovery, the surveillance tests were immediately conducted and all equipment was found to be satisfactory. All stations were declared operable and all personnel responsible were counseled to emphasize the importance of due dates. An administrative guideline was implemented February 26, 1986 to require notification of responsible supervisors when a surveillance test approaches an overdue date. There were no adverse consequences as a result of this event.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1)  Limerick Generating Station Unit 1	DOCKET NUMBER (2)  0   5   0   0   0   3   5   2	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		8 6	- 0   0   6	- 0   1	0   2	OF 0   4

TEXT (If more space is required, use additional NRC Form 366A's) (17)

Unit Condition Prior to the Event:

Mode 4 (Cold Shutdown)  
Reactor Power 0%  
(Shutdown for repair of the #4 Main Turbine Control Valve)

Description of the Event:

Technical Specification 4.7.6.5.a states: "Each of the fire hose stations shown in Table 3.7.6.5-1 shall be demonstrated OPERABLE: (a) At least once per 31 days by a visual inspection of the fire hose stations accessible during plant operation to assure all required equipment is at the station". Surveillance Test 7-022-953-0, fire hose station visual inspection test, includes fire hose stations in Table 3.7.6.5-1.

Technical Specification 4.7.6.6.a states: "Each of the yard fire hydrants and hose cart houses shown in Table 3.7.6.6-1 shall be demonstrated OPERABLE: (a) At least once per 31 days by visual inspection of the hose cart house to assure all required equipment is at the hose house". Surveillance Test 7-022-953-0, hose cart visual inspection test, includes the hose cart house in Table 3.7.6.6.-1.

On January 22, 1986, it was determined that monthly Surveillance Tests ST-7-022-951-0 and ST-7-022-953-0 had not been performed in accordance with the "once per 31 days" visual inspection requirements of Technical Specifications 4.7.6.5.a and 4.7.6.6.a.

During the time interval between January 19, 1986 and January 22, 1986, all fire hose stations and the hose cart station were considered to have been administratively inoperable in accordance with the requirements of Technical Specification 4.0.3.

The EIIS code for the affected system is KP.

Consequences of the Event:

There were no adverse consequences resulting from this event. The possible consequences which could have resulted from this event were minimal. Although the hose cart and hose stations were considered administratively inoperable from January 19 to January 22, 1986, the results of the test performed on the date

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FACILITY NAME (1)  Limerick Generating Station Unit 1	DOCKET NUMBER (2)  0   5   0   0   0   3   5   2	LER NUMBER (6)			PAGE (3)	
		YEAR 8   6	SEQUENTIAL NUMBER -   0   0   6	REVISION NUMBER -   1   0	0   3 OF 0   4	

TEXT (If more space is required, use additional NRC Form 366A's) (17)

of discovery were satisfactory. The hose cart house in question provides backup manual suppression protection for the diesel generators. These areas were protected by operable pre-action sprinkler systems and smoke and flame detection systems. These systems would have provided early detection and control of a fire in any diesel generator compartment.

Additionally, various areas of the control and reactor enclosures are provided with detection and suppression systems as described in the Fire Protection Evaluation Report. Early detection and automatic suppression would have been accomplished.

Cause of the Event:

The cause of this event was inadequate communications of surveillance test due dates among the Fire Protection group members and an inadequate supervisory overview of the surveillance test performance.

Corrective Actions:

ST-7-022-951-0 and ST-7-022-953-0 were immediately performed on January 22, 1986 and all fire hose stations and hose cart stations were declared operable. All personnel responsible for this event were immediately counseled to emphasize the importance of the due dates on all surveillance tests pertinent to the Fire Protection Group.

Action Taken to Prevent Recurrence:

The following mechanisms were placed into effect to ensure that all fire protection surveillance tests are performed on schedule.

- (1) In place of using a highly visible surveillance test status board the Fire Protection group receives the surveillance test master file directly from the Surveillance Test and Records System (STARS) computer file. This master file provides information pertinent to the surveillance test

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		YEAR 8   6	SEQUENTIAL NUMBER -   0   0   6	REVISION NUMBER -   0   1	0   4	OF 0   4

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title, number, test due date, and two (2) future test dates. Using the data from the master file the fire protection surveillance test coordinator schedules and assigns surveillance tests to responsible individuals to be performed during any particular month. A copy of the master file data is maintained in the Fire Protection office and is reviewed biweekly by the Fire Protection Supervisor or designee to ensure that each surveillance test has been assigned to be performed.

- (2) An administrative guideline, Surveillance Test Position #37, "Approaching Overdue Notification", was implemented February 26, 1986 to notify responsible supervisors when a surveillance test approaches an overdue date. As a result, the Fire Protection Supervisor will be notified, by the Surveillance Test Coordinator, before a particular surveillance test exceeds its surveillance period and the day the surveillance test is due.

Additionally, personnel in the fire protection group were counseled on the importance of assuring that when surveillance tests are assigned, the test due dates are understood and that personnel should review the surveillance test master file periodically.

Previous Similar Occurrences

Previous Limerick LERs 84-016, 85-069, 85-008, and 85-096 report events of missed surveillance tests.

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May 19, 1988

Docket No. 50-352

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

SUBJECT: Licensee Event Report  
Limerick Generating Station - Unit 1

This revised LER addresses the failure to meet the surveillance requirements on the Fire Hose Stations and Hose Cart Houses as required by Technical Specification 4.7.6.5.a and Technical Specification 4.7.6.6.a. Revisions are indicated by a vertical bar in the margin.

Reference: Docket No. 50-352  
Report Number: 86-006  
Revision Number: 01  
Event Date: January 19, 1986  
Report Date: May 19, 1988  
Facility: Limerick Generating Station  
P.O. Box A, Sanatoga, PA 19464

This revised LER is being submitted pursuant to the requirements of 10 CFR 50.73(a)(2)(i)(B) to provide additional information to update the actions taken to prevent recurrence.

Very truly yours,



R. H. Logue  
Assistant to the Manager  
Nuclear Support Division

cc: W. T. Russell, Administrator, Region I, USNRC  
T. J. Kenny, Senior Resident Inspector

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