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JOSEPH W. GALLAGHER
VICE PRESIDENT
NUCLEAR SERVICES

10 CFR Part 2
Section 201

June 10, 1988
Docket No. 50-352

Mr. Edward C. Wenzinger, Chief
Projects Branch No. 2
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

SUBJECT: Limerick Generating Station
Inspection Report No. 50-352/88-08

Dear Mr. Wenzinger:

Your letter dated May 11, 1988 forwarded Inspection Report 50-352/88-08 for Limerick Generating Station. Appendix A of your letter identified a violation of administrative controls. This violation is restated below followed by our response.

If you have any questions or require additional information, please do not hesitate to contact us.

Very truly yours,

Joe Gallagher

Attachments

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

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Restatement of Violation

Plant Technical Specification 6.8.1 requires written procedures to be established, implemented and maintained to control various plant activities.

Administrative Procedure A-3 provides measures for the control of temporary changes to procedures used by the plant staff. Step 5.6 requires that the proposer of the change assure that the original of the procedure is placed at the work control station and/or notifying personnel affected by the change.

Contrary to the above procedure SE-8 Attachment D, Safe Shutdown Method D, was not maintained properly in that Temporary Procedure Change Number 88-024 was not placed at the work control station in that the controlled copies of the procedures in the main control room were not updated.

This is a Severity Level IV violation (Supplement 1)

Response to Violation

Admission of Alleged Violation:

Philadelphia Electric Company acknowledges the violation in that a procedure (SE-8 Attachment D, Safe Shutdown Method D) was temporarily revised according to Administrative Procedure A-3, "Procedure for Temporary Changes to Approved Procedures", but was not maintained properly at the proper work control station as required.

Reason for the Violation:

The reason for the violation is that a Temporary Procedure Change (TPC) had been lost and was not found at the required work control location. Administrative Procedure A-3 did not have a clear method for assuring the placement and control of temporarily changed procedures that may not be immediately used.

Significance of Violation:

There was no impact on normal operations as a result of this violation. The significance of the violation is minimal because an Operator Aid (No. 92-49) was posted at the local control panel

providing similar instructions as those contained in the TPC. In addition, Operations personnel had been made aware of this TCA and its effects through the normal communication methods as required by Administrative procedures A-7 (Shift Operations) and A-42 (Procedure for the Control of Temporary Circuit Alterations - TCA).

Corrective Actions Taken to Prevent Recurrence and Results Achieved:

Special Event Procedure SE-8, Attachment D, was revised on March 15, 1988 to include the information contained in Temporary Procedure Change Number 88-024. The D-14 emergency diesel generator local/remote control switch was repaired on April 12, 1988. The Special Event Procedure SE-8 was revised to the original wording, on April 15, 1988.

Actions Taken to Avoid Future Non-Compliance:

Administrative Procedure A-3 was revised on April 29, 1988 to provide a notice, in controlled copies of procedures, which may be used repetitively, that a Temporary Procedure Change exists. This notice will direct the user to a TPC book maintained in the Control Room. This book and a similar book in the Remote Shutdown Panel will contain copies of the active TPCs identified by a TPC notice.

Date When Full Compliance Will be Achieved:

Full compliance was achieved on March 15, 1988 when a Special Event Procedure SE-8, Attachment D was revised to incorporate the TPC information.