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JOHN S. KEMPER
SENIOR VICE-PRESIDENT - NUCLEAR

February 11, 1988

Docket No. 50-352

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

SUBJECT: Response to Inspection Report No. 50-352/87-28

Dear Mr. Gallo:

Your letter dated January 14, 1988 forwarded Inspection Report No. 50-352/87-28 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 Specification 6.8.1 requires that plant procedures be implemented, including those procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, for administrative control of plant equipment.

Administrative Procedures A-8 and A-41 provide measures for the control of locked valves and the removal from service of equipment required to be operable by the Technical Specifications, respectively. Step 5.1 of both procedures A-8 and A-41 requires shift supervision permission to change locked valve position or the release of equipment for maintenance.

Contrary to the above, on November 16, 1987, fire suppression water isolation valves numbered 022-1106 and 0058 were unlocked and closed from 1:00 am to 5:15 am without shift supervision permission. This resulted in the isolation and inoperability of 17 fire hose stations and safety-related

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ventilation system filters without the establishment of compensatory firewatches and substitute fire hose water sources.

This is a Severity Level IV Violation.

Admission or Denial of Alleged Violation:

Philadelphia Electric acknowledges the violation as stated.

Reason for the Violation:

A licensed and non-licensed operator failed to follow Administrative Procedures A-8 and A-41.

Extent or Significance of Violation:

There were no adverse effects and no release of radioactive material to the environment as a result of this event. The fire protection safe shutdown analysis (FPER, Chapter 5) assumes no credit for manual fire fighting efforts or operation of automatic fire suppression system and also assumes the disabling of all equipment and cabling in the fire area. Because of plant design, the inoperability of portions of the fire suppression system does not have any adverse impact on the capability to safely shutdown the reactor in the event of a fire.

One of the four standpipe risers in the Reactor Enclosure was affected. The combination of available hose and unaffected hose stations would have provided an effective hose stream to any area in the Reactor Enclosure. Additionally, Reactor Enclosure sprinkler systems (except for a system on Elevation 201' and a system on Elevation 283') and water curtains remained operable. Although fire suppression to the safety related ventilation system was affected, the operability of the safety-related ventilation system filters was not affected.

The following systems were available:

- (1) the CO2 systems in the Control Enclosure for the Cable Spreading Room, Control Room, and 13 KV Switchgear Room,
- (2) the Halon System for the Auxiliary Equipment Room and Remote Shutdown Panel Room and,
- (3) the sprinkler system for the Cable Spreading Room were available.

Installed fire detection instrumentation and a roving fire watch patrol would have provided early fire brigade response using fire extinguishers and available fire suppression equipment.

Corrective Actions Taken and Results Achieved:

Once the blocked systems had come to the attention of the Control Supervisor, the permit blocking was immediately removed and the fire suppression systems were returned to service within 15 minutes of identification. The fire suppression system was declared operable at 0515 hours.

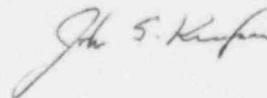
Corrective Actions to be Taken to Avoid Future Non-Compliance

A special Plant Operations Review Committee (PORC) meeting was convened on November 24, 1987, to discuss this and other recent incidents involving operating personnel errors. The results of the review will be covered in the next cycle of licensed and non-licensed operator requalification training. The Chief Operator and Floor Operator responsible for the block were counseled about adherence to the "Rules for Permits and Blocking" and to Administrative Procedures. The Chief Operator also received an 'Oral Warning' in accordance with PECO disciplinary policy. In addition, a memo from the Operations Engineer to all Shift personnel was issued on November 18, 1987 to stress the importance of attention to detail. Review of the memo with Shift Personnel has been completed with each shift complement.

Date When Full Compliance Was Achieved

On November 16 at 0515 hours, the fire suppression system was restored to operable status. There were no items in non-compliance after this time.

Very truly yours,



Attachments

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