PHILADELPHIA ELECTRIC COMPANY

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SHIELDS L DALTROFF VICE PRESIDENT ELECTRIC PRODUCTION

April 23, 1986

Docket No. 50-352

Inspection Report: 50-352/86-01

Mr. Samuel J. Collins, Chief Project Branch 2 Division of Reactor Projects U.S. Nuclear Regulatory Commission Region I 631 Park Avenue King of Prussia, PA 19406

Dear Mr. Collins:

Your letter dated March 24, 1986 forwarded the Notice of Violation for Inspection Report No. 50-352/86-01 for Limerick Generating Station. The notice of violation, as described in Appendix A, addresses three items which do not appear to be in full compliance with Nuclear Regulatory Commission requirements. The items concern: (1) barrier openings which apparently existed prior to the effective date of the security plan and were not identified during initial walkdowns of the barriers, (2) security force members who did not adhere to procedural requirements by leaving assigned posts on two occasions, and (3) a security supervisor who did not document and report the security force member leaving his post to higher supervision once he became aware of the incident.

The incidents involved in these violations were discussed in an Enforcement Conference on February 7, 1986. Our response to these violations is presented in Appendix A of this letter.

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In addition, your letter expresses concern regarding the monitoring of the contract guard force at Limerick. In order to address this concern a program is being developed which will provide for more extensive and systematic oversight of the contract security force. Under this program a series of oversight modules covering the various areas of concern will be developed. These modules will be performed daily on one of the three shifts on an unannounced basis on a schedule which is consistent with the performance of the entire series of modules monthly. Initially these modules will be performed by specially trained members of the Electric Production Quality Control (EPQC) organization who will be detached from EPQC and will report directly to the Nuclear Security Specialist or, in his absence, Philadelphia Electric Company shift supervision when fulfilling this role. It is anticipated that it will take approximately 45 days to develop and implement this program.

It is hereby requested that Appendix A of this letter be withheld from public disclosure pursuant to Sections 2.790 and 73.21 of the Commission's rules. The Appendix discusses the security at a nuclear facility and contains information, the disclosure of which would clearly constitute an unwarranted invasion of personal privacy. An affidavit in support of this request is attached.

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

Very truly yours,

Attachment

CC: Dr. T. E. Murley, Administrator, Region I, USNRC
E. M. Kelly, Senior Resident Site Inspector
See Attached Service List (w/o Appendix A)

ATTACHMENTS CONTAIN SAFEGUARDS INFORMATION. UPON SEPARATION, THIS PAGE IS DECONTROLLED.