

December 8, 1997

Mr. D. M. Smith, President  
PECO Nuclear  
Nuclear Group Headquarters  
Correspondence Control Desk  
P. O. Box 195  
Wayne, PA 19087-0195

SUBJECT: NRC INTEGRATED INSPECTION REPORT 50-352/97-08, 50-353/97-08

Dear Mr. Smith:

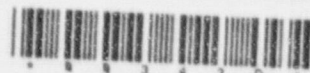
This refers to the inspection conducted on September 16, 1997, through November 17, 1997, at your Limerick Units 1 and 2 reactor facilities. The enclosed report presents the results of this inspection.

During the nine-week inspection period covered by this report, the conduct of activities at Limerick Units 1 and 2 was generally characterized by safe and conservative operations and decision making. Your operators' response was excellent to an unexpected control rod drift. On-line hydraulic control unit maintenance was completed without error or challenge to safe plant operations. Activities in the Technical Support Center following a fire that occurred in one of the eight site emergency diesel generators were performed well with conservative decisions and thorough verifications made.

However, the NRC raised concerns regarding PECO Energy's initial assessments following the failure of a control rod to scram at Unit 2. PECO did not perform a prompt and comprehensive assessment of generic and common mode concerns associated with aging BUNA-N diaphragms, and did not initially verify whether an unanalyzed condition existed. A number of conference calls occurred between your staff and NRC management resulting in further testing and analysis.

There were a number of instances where your staff did not correctly implement procedures and processes. For example, during previous configuration changes made to the residual heat removal service water radiation monitoring system, engineering reviews of the system configuration and drawings were inadequate to ensure that the emergency service water system was properly monitored. Another example involved several individuals that failed to properly annotate the reasons for not performing fire damper functional tests consistent with the procedural requirements. Although these and other examples were minor issues, the NRC is concerned with the number of issues that occurred. Management attention is warranted to ensure that a wider procedural compliance problem does not exist.

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Mr. D. M. Smith

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In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosure(s), and your response will be placed in the NRC Public Document Room (PDR).

Sincerely,

Original Signed By:

Clifford J. Anderson, Chief  
Project Branch No. 4  
Division of Reactor Projects

Docket Nos.: 50-352, 50-353  
License Nos: NPF-39, NPF-85

Enclosures:  
NRC Inspection Report 50-352/97-08, 50-353/97-08

cc w/encl:  
G. A. Hunger, Jr., Chairman, Nuclear Review Board and Director - Licensing  
W. MacFarland, Vice President - Limerick Generating Station  
J. L. Kantner, Manager, Experience Assessment  
Secretary, Nuclear Committee of the Board  
Commonwealth of Pennsylvania



Mr. D. M. Smith

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