

APPENDIX B  
NOTICE OF DEVIATION

Philadelphia Electric Company  
Limerick Generating Station, Unit 1

Docket No. 50-352  
License No. NPF-39

As a result of the inspection conducted on July 21 - 31, 1986 and in accordance with General Statement of Policy and Procedure for NRC Enforcement Actions, 10 CFR Part 2, Appendix C (Enforcement Policy 1986), the following deviation was identified:

Final Safety Analysis Report (FSAR) Subsections 6.2.4.3.1.3.2.10 and 11 describe the outboard isolation valves on the supply and return lines for Reactor Enclosure Cooling Water (RECW) and Drywell Chilled Water (DCW) as capable of remote manual closure from the main control room, and state that interim operating procedures exist to effect manual isolation under appropriate conditions.

Limerick License Condition 2.C.10 allows for operation during the first fuel cycle with the outboard isolation valves in the supply and return lines of RECW and DCW systems not receiving automatic isolation signals. The condition is based on the implementation of interim operating procedures to ensure remote manual closure following onset of an accident, as described in a PECO letter to the NRC dated September 21, 1984, and as documented in Supplement 3 to the Limerick Safety Evaluation Report, Subsection 6.2.4.2, dated October, 1984.

Emergency operating procedure T-250, Remote Manual Primary Containment Isolations, provides guidance to remotely close the RECW and DCW outboard isolation valves by lifting leads in the main control room if a leak is suspected to be contributing to releases in the Reactor Enclosure.

Contrary to the above, Electrical Drawing No. E-465, Sheet 1, Schematic for RECW and DCW Motor Operated Valves, depicts valves HV87-120, 121, 124 and 125 for loops A and B as having shunt trip coils. Therefore, under design basis accident conditions, these valves would not be capable of remote manual closure from the main control room. The valve motor loads are shed from but not automatically sequenced back onto their respective safeguards buses, and would require shutting the valve breakers locally.

Philadelphia Electric Company is hereby requested to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including the corrective steps which have been taken and the results achieved.

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