

## NOTICE OF VIOLATION

Philadelphia Electric Company  
Limerick Generating Station, Unit 1

Docket No. 50-352  
License No. NPF-39  
EA 87-196

The NRC special safety construction team inspection on June 22 to July 2, 1987, and a followup inspection on October 20, 1987 in response to a licensee event report on October 5, 1987, reviewed the circumstances associated with the identification of a violation of NRC requirements. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987), the violation is set forth below:

License Condition 2.c.3, requires, in part, that the licensee maintain in effect all provisions of the Fire Protection Evaluation Report (FPER) through Revision 6.

Section 3.2.1 of the FPER through Revision 6 specifies that fire protection features shall be provided for structures, systems, and components important to safe shutdown, and shall be capable of limiting fire damage so that one train of systems necessary to achieve and maintain hot shutdown conditions from either the control room or emergency control station(s) is free of fire damage.

Contrary to the above, as of October 2, 1987, fire protection features were not provided for control cables associated with the Emergency Diesel Generators (EDGs), a system important in maintaining safe shutdown, to assure that one redundant train remained free of fire damage. These control cables were associated with the automatic fire suppression system flow switches that shut down the EDGs in the event of a fire in the EDG room. These cables were routed in the service water pipe tunnel area and were not provided with a means to maintain one of the trains free of fire damage. If a fire occurred in the tunnel area, it could create multiple internal shorts in the connections between the flow switches and associated time delay relays resulting in trip signals for all four EDGs, with two EDGs required by the FPER to achieve and maintain hot shutdown.

This is a Severity Level III violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201 Philadelphia Electric Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Regional Administrator, Region I, and a copy to the NRC Resident Inspector, within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation and should include for each violation: (1) the reason for the violation if admitted, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an

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order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken. Consideration may be given to extending the response time for good cause shown.

FOR THE NUCLEAR REGULATORY COMMISSION

Original Signed By  
WILLIAM T. RUSSELL  
William T. Russell  
Regional Administrator

Dated at King of Prussia, Pennsylvania  
this 30 day of December 1987