Docket Nos. 50-352 50-353 License Nos. NPF-39 CPPR-107

EA 89-126

Philadelphia Electric Company
ATTN: Mr. C. A. McNeill, Jr.
Executive Vice President - Nuclear
Correspondence Control Desk
P. O. Box 7520
Philadelphia, Pennsylvania 19101

Gentlemen:

Subject: Combined Inspection Report Nos. 50-352/89-11 and 50-353/89-17

A routine safety inspection of your emergency preparedness program was conducted by C. Conklin and other members of this office on May 22-26 and June 7, 1989, at the Limerick Generating Station, Limerick, Pennsylvania. Discussions of our findings were presented by Mr. Conklin to Mr. Graham Leitch and other members of your staff at the conclusion of the inspection. Mr. Leitch presented actions that were to be immediately implemented regarding the inability of certain emergency response personnel to properly classify certain events in a rapidly escalating emergency. These actions were subsequently documented in a letter to the NRC dated May 26, 1989 and found to be acceptable.

Areas examined during this inspection are described in the NRC Region I Inspection Report which is enclosed with this letter. Within these areas, the inspection consisted of selective examination of procedures and representative records, interviews with personnel, and observations by the inspector.

We are very concerned by the inability of your operators to properly classify certain events during walk-through examinations and by the repetitive uncorrected programmatic weaknesses identified in your emergency preparedness program. As discussed with Mr. Leitch by Dr. Ronald R. Bellamy of this office, these matters will be discussed at an Enforcement Conference at our office in King of Prussia, Pennsylvania on July 5, 1989 at 1:00 p.m. The purposes of the Conference are (1) to discuss the safety significance of the apparent violations, their root causes, and your corrective actions; (2) to ensure we have a common understanding of the facts associated with the apparent violations; and (3) to determine if there are mitigating or extenuating circumstances associated with the apparent violations that should be considered by the NRC in determining the appropriate enforcement action. Our decision concerning enforcement action for these matters will be communicated to you by separate correspondence following the enforcement conference.

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Your cooperation with us in this matter is appreciated.

Sincerely,

Original Signed By: Malcolm R. Knapp

Malcolm R. Knapp, Director Division of Radiation Safety and Safeguards

Enclosure:

NRC Region I Combined Inspection Report Nos. 50-352/89-11 and 50-353/89-17

J. S. Kemper, Sr., Senior Vice President - Nuclear Construction

G. M. Leitch, Vice President, Limerick Generating Station

S. J. Kowalski, Vice President - Nuclear Engineering D. R. Helwig, General Manager - Nuclear Services

M. J. McCormick, Jr., Manager - Limerick Generating Station

W. T. Ullrich, Manager - Limerick Unit 2 Startup

A. S. MacAinsh, Manager - Limerick Quality Division

G. A. Hunger, Jr., Director - Licensing Section

T. B. Conner, Jr., Esquire

E. J. Bradley, Esquire, Assistant General Counsel

H. D. Honan, Branch Head - Nuclear Engineering Licensing

Public Document Room (PDR)

Local Public Document Room (LPDR)

Nuclear Safety Information Center (NSIC)

NRC Resident Inspector

Commonwealth of Pennsylvania

bcc w/encl:

Region I Docket Room (with concurrences) Management Assistant, DRMA (w/o encl)

E. Wenzinger, DRP J. Linville, DRP

T. Kenny, SRI
J. Lieberman, OE
J. Goldberg, OGC
J. Partlow, NRR
D. Holody, ES

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6/15/89

22PS Bellamy

6/14/89

6//9/89

KNAPP

6/1/89

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