

# PHILADELPHIA ELECTRIC COMPANY

LIMERICK GENERATING STATION  
P. O. BOX A  
SANATOGA, PENNSYLVANIA 19464  
(215) 327-1200, EXT. 3000

May 11, 1989

GRAHAM M. LEITCH  
VICE PRESIDENT  
LIMERICK GENERATING STATION

Docket Nos. 50-352  
50-353  
License No. NPF-39  
Construction Permit No. CPPR-107

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

SUBJECT: Limerick Generating Station, Units 1 and 2  
Response to a Request for Information Regarding  
a Potential Violation of 10CFR50.7

NRC letter dated April 11, 1989, forwarded information regarding a potential violation of 10CFR 50.7 stemming from a complaint from a contractor employee (Mr. Taggart). This letter requested that we provide a basis for the employment action regarding this contractor employee and any investigation reports regarding the circumstances of the action. The letter also requested a description of the actions taken or planned to ensure that this employment action does not have a chilling effect in discouraging other licensee or contractor employees from raising perceived safety concerns. A response to the letter was requested within 30 days of the date of issuance. This letter provides our response.

Response which provides the basis that the employment action was reasonable and non-discriminatory. (Two investigation reports and a chronology of events are included as Attachments 1, 2, and 3)

Mr. Taggart alleged that on January 12, 1989, he was discriminated against and harassed for raising a concern to the NRC back in April of 1987. This discussion with the NRC was a protected activity under the scope of 10CFR50.7. The discrimination and harassment allegation revolves around a reassignment from a pipefitter tool room to a field crew welding assignment and subsequent loss of wages which occurred in January and February of 1989 and verbal abuse from a Bechtel Superintendent, which allegedly occurred after April 1987.

Between April 1987 and December 1988, Mr. Taggart's work assignment as a pipefitter/welder was to perform welding functions in the plant. During this period of time, there were numerous work force reductions after a 1987 Unit 1 outage and of 400 pipefitters, Mr. Taggart was one of seven pipefitters/welders retained to support non-outage work. Of these seven individuals, one was a Foreman, five were pipefitters and one was pipefitter and qualified welder (i.e. Mr. Taggart). Mr. Taggart was retained because he was qualified in all areas of welding needed at the plant and he had good knowledge of the plant systems and procedures. The fact that Mr. Taggart remained employed during this entire period is clear evidence of a lack of discriminatory action immediately following the conversation with the NRC. In December 1988, Mr. Taggart requested that he be assigned to work in the pipefitter tool room during the second shift. The tool room position is not a supervisory position and does not require any special skills (such as welding does), however, there is a pay increase for working second shift. The General Foremen arranged the transfer with the understanding that Mr. Taggart may need to be reassigned to the field crew should manpower conditions warrant.

Prior to the start of the Unit 1 Second Refueling Outage in January 1989, five of the original seven pipefitters became supervisors. The remaining two individuals were not promoted because they were assigned to special assignments (i.e. tool room positions) as the two individuals had requested. During preparations for this outage the local pipefitters union was unable to provide a sufficient number of qualified welders. All qualified welders were needed to support the scheduled outage prefabrication work demand including those reassigned to other positions or shifts and on January 12, 1989, Mr. Taggart was reassigned to a field crew to perform welding functions. On February 21, 1989, at the conclusion of this assignment, Mr. Taggart was reassigned to the tool room because (1) the pipefitter then in the tool room had to attend training classes; (2) Mr. Taggart was familiar with the tool room; and (3) there was a reduction in the amount of welding tasks required in connection with the outage. Mr. Taggart remained assigned to the tool room until his voluntary resignation on April 13, 1989.

On January 13, 1989, Mr. Taggart brought the complaint of discrimination and harrassment to the attention of Bechtel's Labor Relations and in accordance with normal procedures, a resolution to the situation was attempted. An agreement could not be reached between Mr. Taggart and Bechtel and Mr. Taggart was told that he could present his claims to the U. S. Department of Labor representative. In early February, Mr. Taggart raised his complaint to the Philadelphia Electric Company (PECo) Modification Superintendent who investigated the issue. This investigation concluded that the job assignment was reasonable and non-discriminatory based upon Mr. Taggart's qualifications, pre-existing work practices and agreements, the existing work

demand and the available manpower. The alleged verbal harrassment by his Bechtel Superintendent was also investigated but could not be substantiated. Mr. Taggart's supervisor, Mr. King, was interviewed during this investigation and said that he knew of no intimidation or harrassment stemming from Mr. Taggart's discussion with the NRC. Mr. King disavowed any harrassment towards Mr. Taggart and denied having said what Mr. Taggart quoted in his complaint. The PECO Modification Superintendent responded back to Mr. Taggart's foreman that the assignment back to the welding job was reasonable. Later, Mr. King was reminded that harrassment for any reason is not permitted and would not be tolerated.

Mr. Taggart then raised the complaint to NRC inspector, R. Gramm who instructed Mr. Taggart that he could file a complaint with the Department of Labor (DOL). On February 6, 1989, Mr. Taggart filed his complaint with the DOL.

On February 8, 1989, Mr. Taggart initiated a quality concern interview with Quality Assurance (QA) and identified the labor dispute as a quality concern. The complaint was reviewed by (QA) and on February 10, 1989, QA concluded that there was no quality concern involved and the matter was then referred to Bechtel management for resolution as a labor issue. As stated above, at the end of the welding assignment, Mr. Taggart was re-assigned back to the second shift tool room position. On February 23, 1989, a mutually agreeable settlement was reached between Mr. Taggart and Bechtel by which Mr. Taggart was to be assigned to the pipefitter tool room for the duration of the outage. The agreement stipulates that if there are any welding tasks which Mr. Taggart is qualified to perform, he will be required to perform those welds and will subsequently return to the tool room. This stipulation is the same condition stated to Mr. Taggart when he originally requested to be assigned to the tool room in December 1988. This agreement does not contain any restrictive clauses which in any way restricts the ability of the employee from providing information about potential safety issues to the NRC. Following the settlement, Mr. Taggart remained assigned in the tool room where he worked until his resignation on April 13, 1989. Following Mr. Taggart's resignation, an exit interview questionnaire was mailed to this home to permit him to identify any quality concerns and to date no response has been received.

Based upon our investigation, we have determined that 1) the employment action in January 1989 was based upon non-discriminatory grounds and was totally unrelated to the informal discussion that Mr. Taggart had with the NRC in 1987 and 2) there was no evidence of verbal intimidation or harrassment related to the informal discussion that Mr. Taggart had with the NRC in 1987. We base our conclusions on the following facts:

- o Mr. Taggart remained employed up until his voluntary resignation in April of 1989 despite numerous work force reductions.
- o Prior to the assignment to the tool room, Mr. Taggart was informed that, in the future, it may be necessary to reassign him to a field crew to perform welding functions.
- o The tool room position which requires no special skills, is not considered a responsible position and the welding tasks requested of Mr. Taggart was the basis for the original and continued employment.
- o Two of the seven individuals retained from 1987, including Mr. Taggart, were not promoted because, as they had requested, they were assigned to special assignments (i.e. tool room positions).
- o In January 1989, due to existing work demand and insufficient manpower, all qualified welders, including those reassigned to other positions or shifts, were assigned to field crews to perform welding functions.
- o Interviews with Mr. Taggart's supervision determined no evidence of verbal intimidation or harrassment towards Mr. Taggart stemming from his informal conversation with the NRC.

Therefore the protected activity (i.e. Mr. Taggart's discussion with the NRC in 1987) was not related to the employment action (i.e. reassignment to a field crew in 1989) and the action should be considered to have been dictated by non-prohibited considerations. The employment action was predicated on non-discriminatory grounds and therefore a violation of 10CFR50.7 did not occur.

Actions taken to encourage licensee and contractor employees to raise perceived safety concerns and to assure these employees that no discriminatory actions would be taken from raising these concerns.

While the following actions were not taken specifically as a result of the alleged harassment described in the April 11, 1989 NRC letter, these actions are intended to ensure that Philadelphia Electric Company (PECO) employees and PECO contractor employees can raise safety (i.e., quality) concerns to PECO management or the NRC without fear of reprisal. PECO has maintained the policy, as stated clearly in the General Employee Training (GET) provided to PECO employees and contractors, that individuals can contact the NRC with their concerns and that no negative action (e.g., harassment, dismissal) would be taken.

- o The PECO "Nuclear Group Management Philosophy for Assurance of Quality" is posted in all Nuclear Group employee and contractor work locations (e.g., Peach Bottom Atomic Power Station (PBAPS), Limerick Generating Station (LGS), Main Office). This document is signed by the Executive Vice President - Nuclear, the Vice Presidents of each of the Nuclear Group departments, including LGS and PBAPS, and the General Manager - Nuclear Quality Assurance (NQA). This document states in part that the management of the Nuclear Group is committed to 1) developing and maintaining an effective problem reporting process so that employees can report observed quality problems or deficiencies quickly and easily, and 2) encouraging open communications about all areas that affect the safety and quality of nuclear activities. This document also states that the Nuclear Group management expects each employee to 1) notify their supervision in a timely manner of any problems with procedural compliance, and 2) report observed quality problems or deficiencies in a timely manner, using established administrative processes.
- o A "Quality Concerns Hotline" was established in October, 1988, and advertised to all Nuclear Group employees and contractors by means of the attached poster (Attachment 4). This poster, signed by the Executive Vice President - Nuclear and the General Manager - NQA, states that anyone who has a quality concern should first notify their supervisor. If not satisfied with the results, the Individual should notify higher levels of management, up to and including the departmental Vice President if necessary. If the Individual is still not satisfied, he/she can call the Quality Concerns Hotline telephone numbers specified on the poster. The poster also states that if the PECO response to a quality concern is not satisfactory, the Individual raising the concern can call the NRC, and provides the telephone numbers for the LGS and PBAPS NRC Resident Inspectors, as well as the NRC Region I offices and the NRC Headquarters.
- o NQA Administrative Procedure NQA-30, effective December 26, 1988, addresses, in part, how an individual's quality concerns should be reported, and defines alternatives available to an individual who believes that his/her previously reported concerns are not receiving proper attention. This procedure applies to all Nuclear Group employees and contract personnel associated with activities for PBAPS or LGS. Furthermore, the "Policy" section of this procedure states "It is the policy of the Nuclear Group to address all concerns and allegations regarding the safe design, operation and maintenance of PECO Nuclear Power

Stations, regardless of the source, in a forthright manner and without reprisal.... No one will ever be penalized for raising a Quality Concern to any level of PECO or to the NRC" (emphasis added). This procedure also provides the telephone numbers for the NRC Resident Inspectors at LGS and PBAPS, the NRC Region I office, and the NRC Headquarters for those individuals who elect to discuss their quality concerns with the NRC. Implementation of this procedure is done by way of the GET Program, distribution of the "Quality Concerns" poster and several corrective action programs utilized at Limerick.

- o During orientation training, all Bechtel employees and job contractors are shown a video tape which explains the process of and the responsibility for raising safety concerns to Supervision, Quality Assurance, and the NRC. This video tape has been shown during the Bechtel orientation training since early 1987.
- o A flier, "Quality Counts," which promotes performing quality work and identified avenues for raising and addressing quality concerns is distributed weekly to all Bechtel employees and subcontractors. This flier has been in use since early 1987.
- o Upon receipt of the allegation letter, the Vice President of Limerick discussed the quality concern policy with his staff in April 18, 1989, to ensure that a culture is nurtured that encourages the identification of quality concerns to Supervision and to ensure that Supervision realizes their responsibilities in performing thorough investigations to resolve the concerns.

Since not all employees at the site have had GET since the incorporation of the "Quality Concerns?" posters, the Plant Manager issued a letter to all site personnel on May 9, 1989. (Attachment 5)

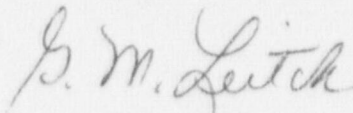
This letter restates the site and Nuclear Group Policy regarding identifying and resolving quality concerns and encourages everyone to help insure nothing is missed. The letter goes on to say that an individual should never feel constrained about raising a question regarding a process or procedure. Attached to the letter was the "Quality Concerns?" poster and several plant mechanisms that can be used to identify and resolve quality concerns.

In summary our investigation into the employment action has concluded that the action was predicated on non-discriminatory grounds and that a violation of 10CFR50.7 did not occur. In addition, sufficient actions have been taken to insure that

employees are encouraged to identify perceived quality concerns without fear of discriminatory actions and therefore the potential for a chilling effect as a result of employee/NRC interactions should not exist at Limerick.

If you have any further questions regarding this matter, please do not hesitate to contact us.

Very truly yours,



G. M. Leitch

DBN:sc

Attachments

cc: W. T. Russell, Administrator, Region I, USNRC  
T. J. Kenny, USNRC Senior Resident Inspector, LGS

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Attachment 1

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LIMERICK GENERATING STATION  
Project Division

Modification Section

May 10, 1989

FROM: R. T. Scott  
TO: Whom It May Concern

REGARDING MR. JACK TAGGART

On April 14, 1987, during the first LGS Unit 1 Refueling Outage, I received a call from the NRC site office (Stan Kucharski) regarding a complaint from a welder. The complaint centered around welder issues and the following particulars:

- 1) Should a welder, who is required to make quality welds that must pass non-destructive examination (NDE) be expected to perform work other than welding, i.e. material handling, fit-up, etc.
- 2) Why should a welder who fails the weld qualification test be banned from rehire for 30 days?

Although the complaint appeared frivolous, I investigated prior to responding.

During the investigation, I inadvertently became aware that the allegation was made by a pipefitter welder, Mr. Taggart. After my investigation, I responded verbally to the NRC with the following response:

- PECO and non-PECO welders are expected to perform duties other than welding.
- Of 405 welds requiring NDE between November 1985 and April 1987, only 1.4% were rejected. This is an acceptable reject rate.
- Seven NCRs had been issued on welding during that period and none of these NCRs were for poor weld quality.
- Welders who fail qualification testing are banned from rehire for 30 days unless they have received additional weld training or respond to a pipefitter (non-welder) call-out.



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Page 2  
Mr. Jack Taggart

The NRC seemed satisfied with our response.

During the early part of the second LGS Unit 1 Refueling Outage (February 1989), Mr. Taggart came to me with a complaint. The complaint centered around Mr Taggart being removed from an assignment in the tool room (a position that resulted in significant overtime) and being assigned to welding. Mr. Taggart also felt he had been harassed by Mr. King for talking to the NRC.

I discussed the matter with Bechtel Superintendent, Mr. Jim King, and noted the following:

- We needed additional welders for outage work and accordingly all welders under Mr. King's supervision were used as welders.
- Mr. King disavowed any harassment.
- Mr. King admitted he had "kidded" Mr. Taggart about his beard but disavowed the quote.

I responded to Mr. Taggart's foreman, Mr. Randy Clemens, that I felt it was reasonable to assign Mr. Taggart back to welding.

Mr. Taggart pursued this matter to the United States Department of Labor. An agreement was reached by Bechtel (Mr. J. L. Darus) and Mr. Taggart that he would be reassigned to the tool room but required to weld when so assigned.

Sometime following my discussion with Mr. Taggart, I observed a similar complaint submitted to the Bechtel Quality Interview Program. Although the Quality Interview Program maintains anonymity, I assumed it was Mr. Taggart's complaint. (Although concerns are solicited upon exiting the site they may be submitted anytime). I approved a response to that complaint that stated: "As of this date, it is understood by Limerick Management that your labor concern has been satisfactory addressed through the United States Department of Labor".

I have since noted that Mr. Taggart quit on April 13, 1989, to take employment elsewhere.

*R. T. Scott*

R. T. Scott  
Modification Superintendent

cak  
cc: T. P. Gotzis  
M. J. McCormick  
D. B. Neff  
E. F. Sproat

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Bechtel Construction, Inc.

P. O. Box A, Sanatoga Branch  
Pottstown, Pennsylvania 19464



MAY 11 1989

In reply please reference  
LTC No.:

19414

Communication Control No.:

F338983

R. T. Scott  
Philadelphia Electric Company  
2301 Market St.  
Philadelphia, PA 19101

Subject: Philadelphia Electric Company  
Limerick Generating Station  
Units 1 & 2, Job 18250  
Response to NRC Request Concerning Employee Allegation

Dear Mr. Scott:

After review of above subject response we found a typographical error on Page 1, paragraph 3 changing the conciliation agreement date to 2/23/89.

Should you have any questions regarding this issue, please feel free to contact me.

Very truly yours,

BECHTEL CONSTRUCTION, INC.

*W. E. Mourer*  
Wayne E. Mourer

Written Response Required: No

WEM/jf

Attachment: (Revised)

ATTACHMENT:

This memorandum is in response to the letter dated April 11, 1989 from William T. Russell, Regional Administrator of the Nuclear Regulatory Commission, to you regarding the disposition of the complaint by J. Taggart on 1/13/89 against Bechtel Construction, Inc. In the April 11, 1989 letter, the NRC requested (1) an explanation for Bechtel's assignment of Mr. Taggart out of the tool crib to perform welding duties in the field, including copies of any investigation reports; and (2) a description of any actions taken to assure that the assignment of Mr. Taggart to welding duties does not have a chilling effect in discouraging other licensee or contractor employees from raising perceived safety concerns.

Our investigation has revealed that Bechtel's assignment of Mr. Taggart to welding duties in January 1989 was solely because the local pipefitters union was unable to provide a sufficient number of qualified welders during an outage. Mr. Taggart, who had been assigned to the tool crib, was a qualified welder whose skills were sorely needed in connection with the outage. It was only because of the lack of other qualified pipefitter welders that he was assigned to perform the necessary welding work in the field. At the conclusion of this assignment, Mr. Taggart was reassigned to the tool crib because (1) the pipefitter then in the tool crib had to attend training classes; (2) Mr. Taggart was familiar with the tool crib; and (3) there was a reduction in the amount of welding tasks required in connection with the outage. Bechtel's assignment of Mr. Taggart to perform welding tasks and then to return to the tool crib had nothing to do with Mr. Taggart's prior informal complaint to the NRC in the fall of 1987. Bechtel's investigation of these matters was informal in nature and did not include any formal investigation reports.

Since Bechtel's investigation revealed that Mr. Taggart's informal complaint to the NRC in the fall of 1987 in no way influenced the decision to assign him welding duties in connection with the recent outage, Bechtel has not taken any formal action with respect to the work assignment other than to enter into the conciliation agreement dated 2/23/89. In the conciliation agreement, which did not admit any wrongdoing, Bechtel and Mr. Taggart acknowledged that Mr. Taggart would be reassigned to the tool crib, subject to his being assigned to welding duties where appropriate.

Bechtel continue to maintain a policy of nondiscrimination and non-retaliation with respect to those who raise safety concerns. Indeed, Bechtel's treatment of Mr. Taggart in the eighteen months following his lodging his informal complaint with the NRC exemplifies this nondiscriminatory/non-retaliation policy. During that period, the complement of Bechtel pipefitters ranged from 400 at the peak down to 8. Even when the pipefitter workforce was reduced to eight, Mr. Taggart remained employed as one of the eight.

In summary, the dispute regarding Mr. Taggart's recent assignment out of the tool crib and into the field as a welder was merely a work assignment dispute totally unrelated to Mr. Taggart's prior informal complaint with the NRC. The dispute was promptly and amicably resolved when, due to circumstances unrelated to the filing of Mr. Taggart's recent complaint, circumstances supported his reassignment to the tool crib. Importantly, the amicable resolution of the complaint acknowledged Bechtel's longstanding right to assign welding tasks to Mr. Taggart where circumstances so warrant.

Chronology of Taggart Allegation

<u>Time</u>	<u>Description</u>	<u>Source</u>
April, 1987	Bob Scott (PECo) Stan Kucharkski (NRC) discussion on quality concerns raised by Mr. Taggart.	Scott (PECo)
	Meeting held between Bechtel Craft Supervisor, Employee's Foreman and General Foreman and Mr. Taggart to discuss the quality concern and the conversation with the NRC.	Eggleston (Bechtel)
	Scott investigates and verbally responds to NRC that there was no evidence of lowered quality as a result of the raised quality concern.	Scott
September 1987	Unit 1 Refueling Outage ends and numerous workforce reductions occur resulting in 400 layoffs leaving 7 pipefitters. The 7 pipefitters which included Mr. Taggart were selected to remain for non-outage work and to become core group for next outage workforce.	Eggleston
September 1987 thru December 1988	Mr. Taggart remains employed as a pipefitter working as a welder.	Eggleston
December 1988	Mr. Taggart requests to be assigned to the pipefitter tool room. The General Foreman arranges the transfer and explains that Mr. Taggart may need to be assigned to the field crew should manpower conditions warrant additional welding needs.	Eggleston
January 12, 1989	Mr. Taggart is assigned to the field crew to perform welding functions due to scheduled outage prefab work demand which exceeded available	Taggart Eggleston Mourer(Bechtel)

Chronology of Taggart Allegation

pipefitter workforce.

<u>Time</u>	<u>Description</u>	<u>Source</u>
January 13, 1989	Mr. Taggart files a grievance with the Bechtel Labor Relations concerning the reassignment and alleges harassment.	Taggart
February 1989	Mr. Taggart raises complaint to Mr. Scott. Who investigates the reassignment and concludes that this action was reasonable based upon existing work demand and available manpower. Alleged verbal harassment could not be substantiated.	Scott
February 6, 1989	Following a discussion with NPC inspector Bob Gramm, Mr. Taggart files a labor complaint with the Department of Labor.	Taggart
February 8, 1989	Mr. Taggart initiates a quality concern interview and he identifies the grievance as a quality concern.	Eggleston Bechtel QA
February 10, 1989	Bechtel QA reviews the complaint and determines that no quality concern exists. The matter is referred to Bechtel management for resolution as a labor issue.	Bechtel QA
February 21, 1989	Mr. Taggart was re-assigned to the toolroom at the completion of the welding assignment.	Eggleston Mourer

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Attachment 3

Chronology of Taggart Allegation

<u>Time</u>	<u>Description</u>	<u>Source</u>
February 23, 1989	A labor agreement is reached between Taggart and Bechtel.	Bechtel DOL
	Mr. Taggart remains in the tool room for the duration of the outage.	Eggleston
April 13, 1989	Mr. Taggart resigns to take employment elsewhere.	Scott

Prepared by  
David B. Neff  
Licensing Engineer 05/09/89

May 11, 1989

Docket Nos. 50-352

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Attachment 4

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# QUALITY CONCERNS ?

*They are ours as well...*

If you have a concern,

- *tell your supervisor.*

If you are not satisfied with the results,

- *take your concern up the management chain, even to the Vice-President, if necessary.*

If you are still not satisfied,

- *call the Quality Concerns Hotline:*

LGS 80-4900 PBAPS 81-4900

-OR-

215-841-4900

## *QUALITY IS EVERYONE'S CONCERN*

If you are not satisfied with the results from the above,

- *You can always call the NRC Resident Inspectors:*

LGS UNIT 1 ext. 4318

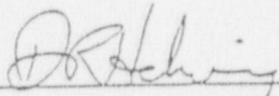
LGS UNIT 2 ext. 4917

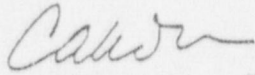
PBAPS ext. 4213

NRC HEADQUARTERS:

215-337-5000

202-951-0550

 10/17/88  
GENERAL MANAGER, NOA

  
EXECUTIVE VICE PRESIDENT-NUCLEAR

May 11, 1989

DocRet Nos. 50-352

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License No. NPF-39

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## PHILADELPHIA ELECTRIC COMPANY

Attachment 5

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LIMERICK GENERATING STATION

P. O. BOX A

SANATOGA, PENNSYLVANIA 19464

(215) 327-1200 EXT. 2000

M. J. McCORMICK, JR., P.E.  
PLANT MANAGER  
LIMERICK GENERATING STATION

May 9, 1989

TO: All Site Personnel

It has recently come to my attention that the process for bringing Quality concerns to the attention of Line Supervision, as covered in the new versions of the Initial and Regual GET Programs may not have reached everyone onsite. Therefore, we are taking this action to restate the Site and Nuclear Group Policy in this regard:

- 1) It is the responsibility and right of each of us at Limerick to report equipment problems or quality work concerns to immediate Supervision.
- 2) It is the responsibility of Line Supervision to be responsive to any concerns raised and to inform the person(s) raising a concern of the resolution in a timely fashion.
- 3) If (2) is not completed in a satisfactory manner, any concern can be brought to the attention of higher Management or the Quality Assurance Organization via their Hot Line Procedure, (see attached guidance).
- 4) Concerns can be brought to the attention of the NRC at any time, either thru their Site Resident Inspectors or via the offices of the Regional Administrator, (see attached guidance).

Naturally, Site Management wants Step (1) to work to satisfy any concerns. In this regard, we encourage employees, including Contractor personnel, to use any of the following formats:

- 1) direct discussion with immediate Supervision, and/or
- 2) Equipment Trouble Tags (ETT Tags - copy attached) given to Shift Supervision, or
- 3) when working under a Maintenance Request Form (MRF) use the MRF feedback form to document concerns (copy attached).



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All Site Personnel

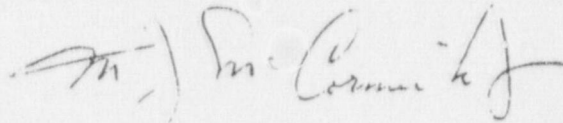
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May 9, 1989

In conclusion, Limerick Station is successful because of close attention to details, supported by quality workmanship. We need your help to insure nothing is missed. Don't ever feel constrained about raising a question regarding process or procedure; we would rather do the job right the first time than have to do it over.

Thank you for your cooperation and if I can ever be of assistance in clarifying questions, please call me at extension 2000.



M. J. McCormick, Jr.  
Plant Manager

MJM:skr

Attachments

c.c. G. M. Leitch  
T. Kenny

# QUALITY CONCERNS ?

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LGS UNIT 1 ext. 4318

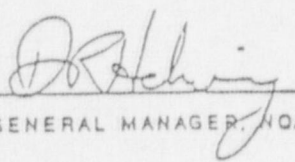
LGS UNIT 2 ext. 4917


PBAPS ext. 4213

NRC HEADQUARTERS:

215-337-5000

202-951-0550

 10/17/88  
GENERAL MANAGER, NOA

  
EXECUTIVE VICE PRESIDENT-NUCLEAR

PHILA. ELECT. CO.  
**LIMERICK EQUIPMENT  
 TROUBLE TAG**

EQUIP. # \_\_\_\_\_ SYS. # \_\_\_\_\_  
 EQUIP. NAME: \_\_\_\_\_  
 SYS. NAME: \_\_\_\_\_  
 LOCATION: \_\_\_\_\_

UNIT  1  2  C TAG # 00 015647  
 PROBLEM: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

STATUS AT FAILURE: \_\_\_\_\_ FAILURE DETECTION: \_\_\_\_\_  
 FAILURE EFFECT ON PLANT: \_\_\_\_\_  
 MODE: \_\_\_\_\_ SYS.: \_\_\_\_\_  
 IDENTIFIED BY: \_\_\_\_\_  
 DATE: \_\_\_\_\_ TIME: \_\_\_\_\_ GROUP: \_\_\_\_\_  
 IMMEDIATE ATTENTION REQ'D.:  YES  NO  
 EQUIPMENT STATUS:  TS LCO ITEM  
 OP  EMERG. USE ONLY  
 INOP  ASSOC. EQUIP. INOP  REQ'D. FOR STARTUP

VERIFIED BY: \_\_\_\_\_  
 DATE: \_\_\_\_\_ TIME: \_\_\_\_\_ GROUP: \_\_\_\_\_

**STATUS AT FAILURE**  
 A - SYSTEM IN SERVICE (OPERATING/STANDBY)  
 B - SYSTEM IN TEST  
 C - SYSTEM IN MAINTENANCE  
 D - SYSTEM OUT OF SERVICE (NOT IN MAINTENANCE)  
 E - SUBSYSTEM CHANNEL IN SERVICE (OPERATING/STANDBY)  
 F - SUBSYSTEM CHANNEL IN TEST  
 G - SUBSYSTEM CHANNEL IN MAINTENANCE  
 H - SUBSYSTEM CHANNEL OUT OF SERVICE (NOT IN MAINTENANCE)

**EFFECT ON SYSTEM**  
 A - LOSS OF SYSTEM FUNCTION  
 B - DEGRADED SYSTEM OPERATION  
 C - LOSS OF REDUNDANCY  
 D - LOSS OF SUBSYSTEM CHANNEL  
 E - NO SIGNIFICANT EFFECT

**FAILURE DETECTION**  
 A - OPERATIONAL ABNORMALITY  
 B - INSERVICE INSPECTION  
 C - SURVEILLANCE TESTING  
 D - PREVENTATIVE MAINTENANCE  
 E - SPECIAL INSPECTION  
 F - AUDIO ALARM  
 G - VISUAL ALARM  
 H - ROUTINE SURVEILLANCE  
 J - INCIDENTAL OBSERVATION  
 X - OTHER (EXPLAIN IN PROBLEM)

**EFFECT ON PLANT**  
 A - REDUCED POWER OPERATION  
 B - UNIT OFF-LINE  
 C - REACTOR TRIP  
 D - PERSONNEL INJURY  
 E - EXCESSIVE OFF-SITE RADIATION  
 F - DAMAGE TO OTHER EQUIPMENT  
 G - NO SIGNIFICANT EFFECT

**F A I L U R E M O D E**

AA - LEAK  
 AB - CRACK  
 AC - BROACH  
 AD - PHYSICAL DISTORTION  
 AE - PHYSICAL DISPLACEMENT  
 AF - COLLAPSE  
 AG - FRACTURE/PEAK  
 AH - WONT START/MOVE  
 AJ - WONT STOP  
 AL - WONT OPEN  
 AM - WONT HOLD  
 AN - WONT RELEASE  
 AP - OUT OF LIGHTS  
 AR - OUT OF ADJUSTMENT  
 AS - SPURIOUS OPERATION  
 AT - FALSE RESPONSE

AU - WONT OPERATE PER DEMAND  
 AV - LOW OUTPUT  
 AW - HIGH OUTPUT  
 AX - NO OUTPUT  
 AY - ARCING  
 AZ - OVER HEATING  
 BA - FLOW LEAK  
 BB - CORROSION  
 BC - BLOCKED OR STOPPED FLOW  
 BD - LOW FLOW  
 BE - HIGH FLOW  
 BF - NOISE  
 BG - VIBRATION  
 BH - OPEN  
 BJ - SHORT  
 BK - PREHEAT/TEMPERATURE RESPONSE  
 BL - WONT RUN  
 BM - WONT CONTROL

BN - WONT SYNCHRONIZE  
 BP - CHATTER  
 BR - WONT TURN AT SPEED  
 BS - OFF FREQUENCY  
 BT - OFF VOLTAGE  
 BU - CONTAMINATION  
 BV - WONT RESPOND  
 BW - ERRATIC OUTPUT  
 BX - INTERMITTANT  
 BY - IMPROPER TIMING  
 BZ - WONT RECORD  
 CA - DRIFT  
 CB - SHORT TO GROUND  
 CC - SHORT TO LINE  
 CD - SHORT TO PIN  
 CE - HIGH LEAKAGE  
 CF - INSULATION DAMAGE  
 CX - OTHER (EXPLAIN IN PROBLEM)

May 11, 1989

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50-353

License No. NPF-39

MAINTENANCE PLANNING FEEDBACK FORM

Attachment 5

Page 5 of 6

Construction Permit No. CPPR-107

Date:

Unit:

System:

MPF Sequence:

Craft:

Mnt-

Location Correction:

Parts Problems (Wrong, Unplanned, Not Needed):

Scaffold Problems (Unplanned or not required):

Job Duration (Enough or too much time allotted):

Manpower Requirements:

Special Tools or Consideration:

Procedure Problem:

Procedure Number:

Form Completed by (Name): For Review by (Craft Asst. Foreman):

(Please use other side for additional comments)

Please complete this form and return to the Maintenance

Planning Group

With a copy (from sides of the completed MPF).

\* May 11, 1989  
\* Docket Nos. 50-352  
\* 50-352  
License No. NPF-39

Construction Permit No. CPPR-107  
Attachment 5  
Page 6 of 6

Effective Date  
12-1-88

LIMERICK GENERATING STATION  
REQUEST FOR REVISION  
TO AN M/IC PROCEDURE

(QA Div. Approval Not Needed)  
A-19, Form 1  
Revision 0  
Page 1 of 1

1. Procedure No. \_\_\_\_\_ Revision \_\_\_\_\_

2. Procedure Title \_\_\_\_\_

3. Equipment Manufacturer \_\_\_\_\_

4. Page No. \_\_\_\_\_ Paragraph No. \_\_\_\_\_ Attachments \_\_\_\_\_

5. Description of proposed change:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

6. Reason:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

7. Originator \_\_\_\_\_  
Name Date

8. Recommended Action:  
 Revise Procedure  
 Other: \_\_\_\_\_

By \_\_\_\_\_  
Senior Staff Member Date

9. Resolution:  
  
By \_\_\_\_\_  
Name Date