James D. von Suskil
Vice President
Limerick Generating Station

PECO NUCLEAR
A Unit of PECO Energy

PECO Energy Company
PO Box 2300
SMB 1-1
Sanatoga, PA 19464-0920
610 718 3000 / Fax 610 718 3008
Pager 1 800 672 2285 #0271
Internet address: jvonsuskil@peco-energy.com

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Docket Nos. 50-352
50-353

License Nos. NPF-39
NPF-85

U.S. Nuclear Regulatory Commission
Attn.: Document Control Desk
Washington, DC 20555

SUBJECT: Limerick Generating Station, Units 1 and 2
Reply to a Notice of Violation
NRC Integrated Inspection Report Nos. 50-352/98-02 and 50-353/98-02

Attached is PECO Energy Company's reply to a Notice of Violation for Limerick Generating Station (LGS), Units 1 and 2, that was contained in your letter dated May 11, 1998. The Notice identified two violations concerning: 1) previous corrective actions did not preclude recurrence of improper application of a lock and chain on a locked valve, and 2) operability concerns for the secondary meteorological tower were not addressed in accordance with plant procedures. The attachment to this letter provides a restatement of each violation followed by our reply.

If you have any questions or require additional information, please contact us.

Very truly yours,

J. von Suskil

D. von Suskil

Attachment

cc: H. J. Miller, Administrator, Region I, USNRC w/attachment
A. L. Burritt, USNRC Senior Resident Inspector, LGS "

A045

Reply To a Notice of Violation

Violation A

Restatement of Violation

During an NRC inspection conducted between January 20, 1998, through March 16, 1998, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

A. 10 CFR 50, Appendix B, Criterion 16, "Corrective Action," in part, requires that measures shall be established to assure that conditions adverse to quality, such as deficiencies, deviations, and non-conformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the condition is determined and corrective action taken to preclude repetition.

Contrary to the above, on February 13, 1998, a significant condition adverse to quality was identified and previous corrective actions on the control of locked valves did not preclude repetition. Specifically, the Unit 1 suppression pool hatch PP-60-106, a primary containment boundary valve, was found unlocked during power operations.

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

REPLY

Admission of the Violation

PECO Energy acknowledges the violation.

Reasons for the Violation

The primary cause of this event was poor human performance in that an experienced worker, having restored valve PP-60-106 to the correct position, applied a lock and chain to the valve incorrectly. The individual was trained, qualified, and had demonstrated successful task performance on numerous previous occasions. Previous corrective actions for improperly locked devices have focused on training to ensure that proper locking techniques and expectations are clearly understood. In this case, the individual clearly understood the technique and expectations. Previous corrective actions would not have prevented this individual performance issue.

Following the occurrence cited in this violation, two (2) additional instanc. es which were in the correct position but improperly locked and chained were identified. Preliminary review of these issues indicates that, in one instance, the personnel involved were not within the scope of personnel targeted for additional training in proper locking techniques. As such, the previous corrective actions did not prevent this recent occurrence. The second instance of improper lock and chain application occurred prior to the implementation of corrective actions for control of locked valves and could not have been prevented by those corrective actions.

Corrective Actions Taken and Results Achieved

The Maintenance technicians involved in this event were counseled regarding expectations for attention to detail by February 17, 1998.

The lessons learned from this event were shared with Maintenance, Instrumentation and Controls, and vendor managers at Limerick and Peach Bottom for discussion with their teams via a memo issued on February 18, 1998. These discussions were completed by March 20, 1998.

The lessons learned from this event were shared with Operations personnel via the Shift Night Orders on March 12, 1998.

All inaccessible Unit 1 locked devices were verified to be in the proper position prior to startup from the 1R07 refueling outage on May 18, 1998.

All valves in the Unit 2 primary containment were verified to be properly locked as of June 3, 1998.

Corrective Actions to Avoid Future Noncompliance

A supervisory briefing sheet was issued on June 4, 1998, to identify required self-check actions for locked components for all site personnel. Supervisory briefings with individual teams will be completed by June 18, 1998.

A video depicting proper methods to secure locked valves has been prepared and is being shown to all site personnel. All personnel are expected to have viewed this video by June 17, 1998.

All locked valves accessible during power operation will be verified to be properly locked by June 22, 1998. This action was originally scheduled to be completed by June 30, 1998; however, the schedule was accelerated in light of the additional occurrences.

Locking devices are being evaluated to identify possible improvements over the current locks and chains which could simplify application of locking devices and reduce the potential for error. The criteria for selection of locked valves is under review to ensure that valves are not included in the locked valve population unnecessarily.

A human performance improvement initiative based upon INPO's Human Performance Fundamentals Course is in progress. This effort addresses performance modes and corresponding tools and strategies that individuals can apply to reduce the potential for errors. This effort is expected to address the human performance aspects of improper locking device application.

Date When Full Compliance was Achieved

Full compliance was achieved on February 13, 1998, when the lock and chain for valve PP-60-106 were properly applied.

Reply To a Notice of Violation

Violation B

Restatement of Violation

During an NRC inspection conducted between January 20, 1998, through March 16, 1998, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

B. Technical Specification (TS) 6.8.1 requires, in part, that written procedures shall be implemented covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A of Regulatory Guide 1.33, Revision 2, February 1978 recommends administrative procedures which include equipment control and procedures for surveillance tests. Licensee Procedure A-C-043, "Surveillance Testing Program," Steps 7.4.4 and 7.5.4 , required that operability concerns be identified so that shift management can make an operability determination. OM-L-9.1-1, "Expectations/Conduct," step 2.4, requires that ST/RT performers must notify shift management immediately if unable to perform ST/RT satisfactorily or in its entirety. OM-L-12.2, Equipment Deficiencies/Potential Action Log," step 2.7, requires that "the equipment deficiency/potential action log entry should be closed out in accordance with Exhibit OM-L-12.2:2 when all associated deficiencies are corrected, and the equipment is properly tested and returned to service."

Contrary to the above, on November 18, 1997, written procedures required by Appendix A of Regulatory Guide 1.33, were not implemented, in that, required operability concerns for Secondary Meteorological Tower were not identified to the shift management; performers did not notify shift management immediately when they were not able to perform the surveillance test satisfactorily; and the equipment deficiency log was closed out without all the deficiencies corrected. Specifically, the secondary meteorological tower 26' differential temperature monitor was declared operable despite the fact that all associated deficiencies had not been corrected prior to its return to service. I&C technicians did not explicitly discuss with operations staff these deficiencies, so that a proper operability determination could be made.

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

REPLY

Admission of the Violation

PECO Energy acknowledges the violation.

Reasons for the Violation

This violation occurred for the following reasons:

1. I&C Technicians and work planners did not notify MCR personnel in accordance with A-C-26, "Administrative Controls for Processing Work Orders," when they generated a corrective maintenance action request to repair a defective cable on the 26' delta temperature channel associated with the Secondary Met Tower. Instead the technicians contacted a work planner who generated the A/R and then had a work planning supervisor review it for adequacy. The technicians proceeded in this manner because they were at the tower which is located several miles from the plant and wanted to receive a work package as soon as possible to resolve the discrepancy. Under normal conditions, the technicians would have generated an A/R and brought it up to the MCR for review. This bypass of proper component deficiency reporting did not allow MCR personnel to acknowledge the deficiency and eventually contributed to inadvertently declaring the tower operable.

2. I&C Technicians did not notify MCR personnel or supervision in accordance with A-C-043, "Surveillance Testing Program," when they encountered difficulties while performing Surveillance Testing on the Secondary Met Tower, specifically when they encountered the defective 26' delta temp element cable. In addition, they did not sign-off the ST as a failure when this deficiency was discovered and continued to allow the test to remain open with no testing activities in-progress. The technicians thought that the repair of the cable would be quick, on the order of 1-2 days, and therefore made a wrong decision to leave the test open. This lack of allowing MCR personnel to review a failed surveillance and make an adequate log entry also contributed to prematurely declaring the Secondary Met Tower operable.

3. Due to #1 and #2 reasons above, the Potential Limiting Condition for Operation log for the Secondary Met Tower was inadvertently closed out and the Secondary Tower made operable without all deficiencies resolved. Operations personnel did review the ST log and verified normal operation of the tower per the daily ST but did not know of the defective cable or the fact that the ST remained open as stated above. A contributing factor to inadvertently declaring the tower operable was that the initial PLCO entry should have contained more information as to the testing activities that were in progress at the time. Only one of four tests in progress was listed.

Corrective Actions Taken and Results Achieved

The following corrective actions have been completed:

1. All I&C Supervisors have been counseled on the need to constantly stress among the I&C Technicians the need for procedure compliance, prompt communications with MCR personnel on the status of work in-progress and component deficiencies, and proper surveillance testing practices.

2. All I&C Technicians have been counseled on the need to maintain procedure compliance, prompt communications with MCR personnel and supervision on the status of work in-progress and component deficiencies, and proper surveillance testing practices.

3. Operations supervision has been counseled on the need to enter detailed PLCO information on their log entries in order to provide the future reader with enough details to make an adequate operability determinations.

4. All Planning and I&C work group supervisors have been counseled on the need to notify the MCR of any corrective maintenance requests, if the apparent equipment or system non-conforming condition could affect operability of the component, system, or plant, cause an adverse environmental condition within or outside the plant, or the effect is unknown, to ensure operability determinations are made by Operations.

Corrective Actions to Avoid Future Noncompliance

The corrective actions listed above are sufficient to prevent recurrence of this violation.

Date When Full Compliance was Achieved

Full compliance was achieved on December 17, 1998, when the defective meteorological tower instrumentation was repaired.