

December 10, 1999

EA 99-298

Mr. G. Rainey, President  
PECO Nuclear  
Nuclear Group Headquarters  
Correspondence Control Desk  
P. O. Box 195  
Wayne, PA 19087-0195

SUBJECT: NRC INTEGRATED INSPECTION REPORT 50-352/99-08, 50-353/99-08

Dear Mr. Rainey:

On November 8, 1999, the NRC completed an inspection at your Limerick Generating Station, Units 1 and 2. Resident inspectors reviewed routine activities and regional inspectors reviewed the licensed operator requalification training program, the radiological control program, and the radioactive liquid and gaseous effluent control program. The enclosed report presents the results of this inspection.

In general, your staff continued to support safe operation of both units. Your staff performed well and responded promptly to a bomb threat. The licensed operator requalification, the radiation protection, and the radioactive liquid and gaseous effluent control programs were effectively implemented and maintained in accordance with regulatory requirements.

This inspection concluded our review of your staff's actions taken regarding your identification of a missed safety evaluation for a temporary change and, as a result, inappropriately defeating the reactor water cleanup leak detection system isolation function. Although your staff's actions were appropriate, your staff did not initially recognize the significance of the issue. In particular, we noted that your organization did not question the effect on safety when the reactor water cleanup isolation function was removed from service when it was required. Our review resulted in the violations that are discussed below.

Based on the results of this inspection, the NRC determined that three violations of NRC requirements occurred. These violations were treated as a Non-Cited Violation (NCV), consistent with Appendix C of the Enforcement Policy. The NCVs involved the failure to perform a safety analysis for a procedure revision that led to implementation of an activity involving an unreviewed safety question; the failure to restore the RWCU isolation logic within the allowed outage time when the RWCU isolation logic was required to be operable; and inadequate monitoring and recording of offsite noble gas releases, and are described in the subject inspection report. If you contest the violation or severity level of the(se) NCV(s), you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN.: Document Control Desk, Washington, D.C. 20555-0001, with a copy to the Regional Administrator, Region I, and the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, D.C. 20555-0001, and the NRC Resident at the Limerick Generating Station.

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Mr. G. Rainey

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In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosure(s), and your response will be placed in the NRC Public Document Room (PDR).

A reply to this letter is not required, but should you have any questions regarding this please contact me at 610-337-5322.

Sincerely,

**Original Signed By:**

Curtis J. Cowgill, Chief  
Project Branch 4  
Division of Reactor Projects

Docket Nos.: 50-352, 50-353  
License Nos: NPF-39, NPF-85

Enclosures:  
NRC Inspection Report 50-352/99-08, 50-353/99-08

cc w/encl:

J. J. Hagan, Senior Vice President, Nuclear Operations  
G. Edwards, Chairman, Nuclear Review Board and Director - Licensing  
J. von Suskil, Vice President - Limerick Generating Station  
M. P. Gallagher, Plant Manager, Limerick Generating Station  
K. P. Bersticker, Manager, Experience Assessment  
Secretary, Nuclear Committee of the Board  
Commonwealth of Pennsylvania

Mr. G. Rainey

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