

Exelon Nuclear
Limerick Generating Station
P.O. Box 2300
Sanatoga, PA 19464

www.exeloncorp.com

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January 31, 2002

Mr. H. J. Miller, Regional Administrator
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Limerick Generating Station (LGS), Units 1 and 2
License Nos. NPF-39 & 85
Docket Nos. 50-352 & 50-353

Subject: LGS Emergency Drill Critique of 2/9/01-Corrective Actions

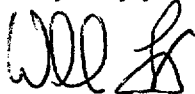
References:

- a. NRC letter dated 11/19/01
- b. NRC Inspection Report 50-352/01-016 and 50-353/01-016 dated 10/22/01
- c. NRC Inspection Report 50-352/01-003 and 50-353/01-003 dated 4/30/01

Attached please find our response summarizing the corrective actions taken and planned in response to an inadequate Emergency Preparedness (EP) critique completed on February 9, 2001. The critique failed to identify a problem with a risk significant planning standard during an emergency preparedness drill.

If you have any questions or require additional information, please do not hesitate to contact us.

Very truly yours,



William Levis
Vice President, LGS

Attachment

cc: A. L. Burritt, USNRC Senior Resident Inspector, LGS
R. Conte, USNRC Region I
NRC Document Control Desk

LGS Shift Operating Crew EP Drill Performance on February 9, 2001

An Apparent Cause Evaluation was performed on the shift operating crew emergency preparedness drill of February 9, 2001. The evaluation determined the following causes:

- Less than adequate drill and exercise performance (DEP) change management,
- Lack of experience, training and inadequate turnover from the scheduled evaluator to the actual evaluator of the drill,
- Lack of guidance for the conduct of drills and emergency preparedness (EP) related critiques in the simulator, and
- Procedural ambiguity for the use of T-116, RF-1 from ERP-101 Table 3.2 "Fission Product Barrier Status Table".

As a result of these causes the following corrective actions have been taken:

- Standards for drill and exercise performance (DEP) and EP critiques have been put in place,
- Licensed Operator Requalification (LOR) instructors have been trained to perform the evaluator function,
- The Emergency Action Level (EAL) bases has been changed to provide additional clarity concerning the "Maximum Core Uncovery Time Limit Curve", and
- Training on the event has been provided to Operations, Training and Emergency Preparedness personnel, and the event has been reviewed throughout the Exelon fleet.

The following corrective actions are in progress and will be completed as indicated:

- Drill performance evaluations to the new standards will be completed with the shift crews prior to the annual exercise. Due Date-4/15/02
- Evaluation of the replacement of the Maximum Core Uncovery Time Limit Curve with the severe accident management plans for "potential loss of containment" (NEI-9901) Due Date-6/30/02