

PHILADELPHIA ELECTRIC COMPANY

LIMERICK GENERATING STATION

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(215) 327-1200, EXT. 3000

May 16, 1991

Docket Nos. 50-352

50-353

License Nos. NPF-39

NPF-85

GRAHAM M. LEITCH
VICE PRESIDENT
LIMERICK GENERATING STATION

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

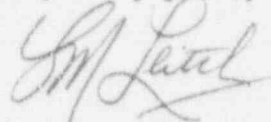
SUBJECT: Limerick Generating Station, Units 1 and 2
Reply to a Notice of Violation
Inspection Report Nos. 50-352/91-05 and 50-353/91-06

Dear Sirs:

Attached is the Philadelphia Electric Company's (PECo's) reply to a Notice of Violation for Limerick Generating Station (LGS), Units 1 and 2, which was contained in NRC Inspection Report Nos. 50-352/91-05 and 50-353/91-06, dated April 10, 1991. The inspection report was received on April 16, 1991, and our response is being submitted within 30 days of receipt, as requested. This Notice of Violation pertains to a violation of Plant Technical Specifications Administrative Controls related to the new procedure review and approval process. This violation was identified during an NRC inspection conducted on February 10 through March 13, 1991.

The attachment to this letter provides a restatement of the violation followed by our response. If you have any questions, or require additional information please contact us.

Very truly yours,



JLP/cah

Attachment

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

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REPLY TO A NOTICE OF VIOLATION

Restatement of the Violation

As a result of an inspection conducted on February 10 through March 23, 1991, and in accordance with NRC Enforcement Policy (10CFR 2, Appendix C), the following examples of violations of Plant Technical Specification Administrative Controls were identified:

- A. Plant Technical Specification 6.8.1 requires, in part, that written procedures shall be established and implemented.

Administrative Procedure A-4.2, "Station Qualified Reviewer Process", paragraph 4.2 states that the Station Qualified Reviewer (SQR) cannot both be the SQR and the Responsible Superintendent when reviewing and approving a particular procedure.

Contrary to the above, on February 27, 1991, changes to procedures ARC-MCR-223, "Annunciator Response Card (ARC) for Main Control Room (MCR) Panel 223" and ARC-MCR-212, "ARC for MCR Panel 212", were approved by an individual who was acting for the responsible superintendent, and had previously approved the procedure as the SQR.

- B. Plant Technical Specification 6.5.3.1 requires, in part, that the SQR shall render a determination, in writing, of whether or not cross-disciplinary review of a new program, procedure, or change thereto is necessary.

Contrary to the above, during the period February 19-26, 1991, changes were made to procedures ARC-MCR-212, "ARC for MCR Panel 212", ARC-MCR-219, "ARC for MCR Panel 219", ARC-MCR-223, "ARC for MCR Panel 2DC861" and S32.8.A, "Placing Unit 1 Main Transformers in Service". These procedures were subsequently approved by the responsible superintendent without the SQR rendering a determination in writing of whether or not cross disciplinary review of the changes was necessary.

- C. Plant Technical Specification 6.5.1.6a requires, in part, that the Plant Operations Review Committee (PORC) shall review proposed changes to procedures requiring a 10 CFR 50.59 safety evaluation.

Plant Technical Specification 6.5.1.7a requires, in part, that the PORC shall recommend to the Plant Manager, in writing, approval or disapproval of items considered under Specification 6.5.1.6a prior to their implementation.

Contrary to the above, on February 15, 1991, changes to procedure ARC-MCR-227, "ARC for MCR Panel 227," and the associated 10 CFR 50.59 safety evaluation were not reviewed by PORC prior to implementation.

The above are examples of PECO's failure to implement administrative controls over the review process and collectively are being considered a Security Level IV violation.

RESPONSE

Admission of Alleged Violation

Philadelphia Electric Company (PECo) acknowledges the violation.

Reason for the Violation

During our investigation into the extent of the violation, additional deficiencies of types different than those identified in the notice of violation were found. These additional deficiencies consisted of missing signatures and dates, information blocks not marked, and inappropriate individuals acting as a Responsible Superintendent. Failure to implement administrative controls over the review process was programmatic and not isolated to any one organization.

The cause of this violation as well as the other related identified discrepancies is the result of several factors:

1. Less than adequate communication between the author of the Technical Specifications (TS) change, corporate licensing, and the personnel implementing the TS change, site licensing.
2. Less than adequate review of the TS change and its associated documentation by the preparer and reviewer of the administrative procedures created or revised to implement the Station Qualified Reviewer (SQR) process.
3. An incorrect procedure that permitted actions outside those prescribed by TS Section 6.5.1.6 that resulted in some procedures requiring a 10CFR50.59 Safety Evaluation being reviewed by a PORC subcommittee and not reviewed by full PORC prior to implementation.
4. A misinterpretation of TS 6.5.1.6. by the plant staff, PORC, and NQA that permitted a PORC subcommittee to review procedures and associated 10CFR50.59 Safety Evaluations for PORC prior to implementation of the procedure.

The PORC subcommittee review was later followed up by a review by full PORC which completed the PORC review but may have occurred after the procedure has implemented. This misinterpretation resulted in the incorrect procedure.

5. Less than adequate training, failure to follow a cumbersome procedure, and a lack of attention to detail combined to cause problems in accurately processing procedures through the procedure review and approval process.
6. Failure to perform a self-assessment or to have Nuclear Quality Assurance (NQA) audit the effectiveness of the new program in a timely manner.

Corrective Actions Taken and Results Achieved

Immediate corrective actions consisted of:

- o Initiating a review on March 18, 1991, that surveyed 284 procedures processed between January 18, 1991, and March 15, 1991 for problems,
- o Issuing a letter on March 20, 1991, that notified Superintendents and SQRs of procedure violations and reminded them of their responsibilities in performing the SQR review and procedure approval,
- o Limiting procedure approval to the four plant superintendents and the Plant Manager and their designees as of March 21, 1991,
- o Eliminating the PORC subcommittee procedure review method as of March 25, 1991, and
- o Initiating actions on March 25, 1991, to correct deficiencies in the processing of procedures that occurred between January 2, 1991, and March 20, 1991.

The following is a list of types of errors identified during the investigation of the SQR Process violation and the corrective actions taken for each. The corrective actions are expected to be complete by July 1, 1991.

1. The SQR individual also approved the procedure for the Responsible Superintendent.

In these cases, the SQR individual was signing for the Responsible Superintendent in his absence. Therefore, another SQR review will be obtained by a different SQR and documented on a supplemental approval form.

2. The cross disciplinary review decision was not documented by the SQR individual.

The SQR individual will perform another evaluation to decide if a cross disciplinary review was required. When required, the SQR individual will verify a cross disciplinary review was obtained or perform a new review. This evaluation will be documented on a supplemental approval form.

3. Some procedure changes that required a 10CFR50.59 Safety Evaluation were not reviewed by PORC prior to implementation.

In these cases all of the procedures were reviewed by a PORC subcommittee prior to implementation and then reported to PORC at a later date. On March 25, 1991, the PORC subcommittee procedure review method was eliminated and any future procedure changes of this type require full PORC review prior to implementation.

4. The Preparer did not sign and/or date the approval form.

If the Preparer had initialed in the PORC review section of the approval form as "preparer", then no corrective action was taken. If there was no preparer signature found, the Preparer will sign a supplemental approval form.

5. The reviewer did not sign the 10CFR50.59 Review form.

In this case, a qualified reviewer performed a review of the 10CFR50.59 Review form and signed a supplemental 10CFR50.59 Review form to document this action.

6. Information blocks were not marked.

In these cases, no corrective actions were taken since these blocks are merely informational. The absence of this information does not pose a safety concern.

7. PORC Position 33 permitted individuals who were not a Manager or Plant Division Superintendent or their designees to sign as a Responsible Superintendent which is contrary to the designation of authority in the TS amendment Safety Evaluation Report.

Procedures processed since the SQR process started will be reviewed to determine if any inappropriate individuals signed as a Responsible Superintendent. The individual procedure and A-4, Form 1 will be re-reviewed and resigned by an appropriate Responsible Superintendent if the procedure was not reviewed and approved by the Plant Manager.

Corrective Actions Taken to Prevent Recurrence

We are completely re-reviewing both our TS amendment request and TS amendment and associated NRC Safety Evaluation Report. The procedures that govern the implementation of the new procedure review and approval process will then be reviewed and revised to ensure the procedures comply with the requirements. Additional enhancements will be made to these procedures to make them easier to implement and less prone to error. This will include a review of the procedure revisions by the author of the TS change. The actions are expected to be completed by July 31, 1991. Retraining of the appropriate station personnel will then be performed to explain the revised process and to provide lessons learned from this violation.

As permitted by procedures A-4, Revision 10 and A-4.2, Revision 0, a PORC subcommittee reviewed procedure revisions that required a 10CFR50.59 Safety Evaluation prior to implementation. These types of procedures will be reviewed by full PORC prior to implementation. Procedures A-4 and A-4.2 will be revised for this change.

Additional actions have been taken to promptly identify programmatic deficiencies.

The Self Assessment process guideline will be revised to include guidance to perform a self assessment within the same self assessment cycle that a major process or program is revised or first implemented. This will help to ensure that any deficiencies in the process or training are identified and corrected early. This

guideline is expected to be revised by July 31, 1991. As part of the self assessment process, all TS amendments implemented since issuance of Unit 2 license will be reviewed to identify any deficiencies in implementation. This review is expected to be completed by July 31, 1991. Any identified deficiencies will be corrected. This review will help to determine whether there were other instances of less than adequate communication with the author of the TS change. The review will also determine whether there were other instances of less than adequate review of the TS change and associated documentation by the preparer or reviewer of the procedures that implement the TS change.

Copies of all future TS amendments will be provided to the NQA Department. The NQA department will review the change and perform an appropriate review of the implementation of the TS amendment.

Date When Full Compliance was Achieved

A survey of 198 procedures reviewed and approved since March 20, 1991, has been performed and no deficiencies were identified. This indicates that the immediate corrective actions have been effective.

Full compliance will be achieved when all procedures processed between January 2, 1991, and March 20, 1991 have been reviewed and corrected and when administrative procedures governing the SQR process are revised. These actions are expected to be completed by July 31, 1991.