



PECO ENERGY

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10CFR 50.73

January 20, 1995
Docket No. 50-353
License No. NPF-85

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

SUBJECT: Licensee Event Report
Limerick Generating Station - Unit 2

This LER reports a condition prohibited by Technical Specifications (TS) in that the 5 minute hot restart TS Surveillance Requirement 4.8.1.1.2.e.8.B for the D23 and D24 Emergency Diesel Generators was not performed within the 18 month surveillance interval due to an inadequate review of a TS change.

Reference:	Docket No. 50-353
Report Number:	2-94-011
Revision Number:	00
Event Date:	December 21, 1994
Report Date:	January 20, 1995
Facility:	Limerick Generating Station P.O. Box 2300, Sanatoga, PA 19464-2300

This LER is being submitted pursuant to the requirements of 10CFR50.73(a)(2)(i)(B) and (a)(2)(vii).

Very truly yours,

DMS:cah

cc: T. T. Martin, Administrator Region I, USNRC
N. S. Perry, USNRC Senior Resident Inspector, LGS

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3150-0104
EXPIRES 8/31/85

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
Limerick Generating Station, Unit 2	0 5 0 0 0 3 5 3	9 4	— 0 1 1	— 0 0	0 2	OF	0 3

TEXT (If more space is required, use additional NRC Form 365A's) (17)

Unit Conditions Prior to the Event:

Unit 2 was in Operational Condition 1 (Power Operation) at 67% power level in end-of-cycle coastdown.

Description of the Event:

On December 21, 1994, at 1225 hours, during review of in-progress revisions of the Loss of Coolant Accident/Loss of Offsite Power (LOCA/LOOP) surveillance test (ST) procedures ST-1-092-111, 112, 113, and 114-2 to implement improvements in preparation for the third Unit 2 refueling outage, station personnel discovered that the Unit 2 Emergency Diesel Generators (EDG) D23 and D24 were out of surveillance with respect to the Technical Specifications (TS) Surveillance Requirement (SR) 4.8.1.1.2.e.8.B. This TS SR requires that on an 18 month frequency the capability of the EDGs to perform a 5 minute hot restart be demonstrated. The D23 and D24 EDGs were immediately declared inoperable, EDG testing was initiated per TS 4.8.1.1.2.e.8.B and 4.0.3, and an investigation of this event commenced.

By 0202 hours on December 22, 1994, both EDGs were successfully tested and declared operable. The D23 EDG was last successfully tested on January 28, 1993 at 1652 hours, and was out of surveillance on December 17, 1994 at 0452 hours. The D24 EDG was last successfully tested on January 25, 1993 at 1030 hours, and was out of surveillance on December 13, 1994 at 2230 hours. The investigation identified that recent changes in the TS program (i.e., 18 month to 24 month refueling outages) had not been adequately addressed in a December 9, 1994 revision of the above stated ST procedures.

Since the TS SR 4.8.1.1.2.e.8.B was not performed within the 18 month frequency, and the TS Actions for the two inoperable EDGs (i.e., TS 3.8.1.1.b and e) were not completed within the specified times, a condition prohibited by TS resulted. Additionally, this event resulted in two independent safety trains being inoperable for the same cause. This LER is being submitted in accordance with the requirements of 10CFR50.73(a)(2)(i)(B) and (a)(2)(vii).

Analysis of the Event:

The actual consequences of this event were minimal in that this event did not cause any challenges to the EDGs, the EDGs and the offsite AC power sources were fully capable of performing their safety function during the time period in question, and the subject EDGs performed satisfactorily under test. There was no release of radioactive material to the environment as a result of this event.

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Cause of the Event:

The cause of this event was an inadequate review by the System Managers of the 18 month to 24 month refueling outage TS change, and its associated impact on the LOCA/LOOP ST procedures. The ST procedures were revised on December 9, 1994, from an 18 month to a 24 month frequency; however, the sections of the ST procedures which demonstrate the 5 minute EDG hot restart should have remained on an 18 month test interval as required by TS.

Corrective Actions:

1. All Unit 1 and Unit 2 EDGs were reviewed for the 5 minute hot restart TS SR. The D21 and D22 EDGs were found to be in surveillance, however, their hot restart tests were due. The D21 EDG was tested on December 27, 1994, and the D22 EDG was tested on January 5, 1995. All Unit 1 EDGs are in surveillance and not due for the hot restart test until the middle of 1995.
2. The LOCA/LOOP ST procedures for the Unit 2 EDGs are expected to be revised by February 1, 1995, to accurately reflect the appropriate 24 month and 18 month TS SR frequencies. The applicable Unit 1 ST procedures will be revised prior to August 1, 1995.
3. Other Unit 1 and Unit 2 EDG ST procedures and schedules will be evaluated and revised as necessary, to ensure that the 24 month and 18 month TS SR frequencies are accurately reflected. This action is expected to be completed by February 1, 1995.
4. A sample of ST procedures that were revised as a result of the 18 month to 24 month refueling outage TS change and which implement multiple TS SRs will be evaluated. This evaluation will verify that all such ST procedures reflect the correct surveillance interval for each TS SR. This item is expected to be completed by March 21, 1995, and appropriate actions will be implemented as necessary.

Previous Similar Occurrences:

There have been no previous events at Limerick involving an incorrect TS SR test interval frequency in an ST procedure, or an inadequate review of a TS change.