

**PECO NUCLEAR**

A UNIT OF PECO ENERGY

PECO Energy Company
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10CFR50.73

March 8, 1996
Docket No. 50-352
License No. NPF-39U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555SUBJECT: Licensee Event Report
Limerick Generating Station - Unit 1

This LER reports a condition prohibited by the Technical Specifications in that a fluid sample of the Unit 1 Reactor Enclosure Cooling Water system was not obtained and analyzed for radioactive contamination within the time limit required by Technical Specifications Section 3.3.7.1 Action 72.

Reference:	Docket No. 50-352
Report Number:	1-96-005
Revision Number:	00
Event Date:	February 7, 1996
Report Date:	March 8, 1996
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).

Very truly yours,

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

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NRC FORM 366 (5-92)		U.S. NUCLEAR REGULATORY COMMISSION			APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95	
LICENSEE EVENT REPORT (LER)					ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503	
(See reverse for required number of digits/characters for each block)						
FACILITY NAME (1) Limerick Generating Station, Unit 1				DOCKET NUMBER (2) 05000 352		PAGE (3) 1 OF 4
TITLE (4) Reactor Enclosure Cooling Water System Fluid Sample Obtained and Analyzed Late.						
EVENT DATE (5)			LER NUMBER (6)		REPORT DATE (7)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH DAY YEAR
02	07	96	96	-- 005 --	00	03 08 96
OPERATING MODE (9) 5			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)			
POWER LEVEL (10) 0			20.402(b)		20.405(c)	
			20.405(a)(1)(i)		50.73(a)(2)(iv)	
			20.405(a)(1)(ii)		50.73(a)(2)(v)	
			20.405(a)(1)(iii)		50.73(a)(2)(vi)	
			20.405(a)(1)(iv)		50.73(a)(2)(vii)(A)	
			20.405(a)(1)(v)		50.73(a)(2)(vii)(B)	
			20.405(a)(1)(vi)		50.73(a)(2)(x)	
			OTHER (Specify in Abstract below and in Text. NRC Form 366A)			
LICENSEE CONTACT FOR THIS LER (12)						
NAME J. L. Kantner - Manager Experience Assessment					TELEPHONE NUMBER (Include Area Code) (610) 718-3400	
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)						
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM
SUPPLEMENTAL REPORT EXPECTED (14)						
YES (If yes, complete EXPECTED SUBMISSION DATE)				X	NO	
				EXPECTED SUBMISSION DATE (15)		
ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)						
<p>On 02/07/96, the daily Reactor Enclosure Cooling Water (RECW) system fluid sample was to be obtained by 1100 hours as required by the action statement of Technical Specification (TS) 3.3.7.1 for an inoperable RECW radiation monitor. The assigned Chemistry technician realized at 1200 hours that the sample had not been obtained. The sample was obtained and analyzed by 1235 hours. Since this sample was not obtained and analyzed within 24 hours of the last sample, the RECW system was operated in a condition prohibited by TS. Other instances of non-compliance with the time limits of the TS Action were identified. Samples of the RECW system fluid were being obtained within the 24 hour limit but the analysis was not performed within the 24 hour limit. The consequences of this event were minimal and there was no release of radioactive material to the environment as a result of the samples being obtained or analyzed late. The cause of the RECW system fluid sample being obtained late was personnel error. The cause of the analysis not being completed within the TS action time limit was an inadequate Chemistry Section sampling program. The sample program was revised to shorten the sampling frequencies and Chemistry personnel were instructed to complete the analysis immediately after the sample was collected.</p>						

LICENSEE EVENT REPORT (LER)
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FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
Limerick Generating Station, Unit 1	05000 352	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 4
		96	-- 005 --	00	

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

Conditions Prior To The Event

Unit 1 was in Operational Condition 5 (Refuel) at the time of this event. The Unit 1 Reactor Enclosure Cooling Water (RECW) System (EIIS: CC) radiation monitor had been inoperable since January 12, 1996, due to spurious spiking of the radiation monitor. Grab samples of the RECW system water were being obtained and analyzed daily by station Chemistry technicians to meet the requirements of Technical Specifications (TS) Section 3.3.7.1 ACTION 72.

Description of the Event

On February 7, 1996, the daily RECW system fluid sample was scheduled to be obtained by 1100 hours. The Chemistry technician assigned to obtain the sample realized at 1200 hours that the sample had not been obtained and notified Chemistry supervision. The technician immediately obtained the sample at 1215 hours and the analysis was completed by 1235 hours.

With the RECW radiation monitor (EIIS: IL) inoperable, ACTION 72 of TS Section 3.3.7.1 requires plant personnel to obtain and analyze at least one grab sample of the RECW system fluid at least once per 24 hours. On February 6, 1996, the RECW system fluid sample was obtained at 1100 hours and analyzed by 1118 hours. Since the sample for February 7, 1996 was not obtained and analyzed within 24 hours of the last sample, the RECW system was operated a condition prohibited by TS. This report is being submitted in accordance with the requirements of 10CFR50.73(a)(2)(i)(B).

During the investigation of this event, other instances of non-compliance with the time limits of TS Action 72 were identified. Samples of the RECW system fluid were being obtained within 24 hours of the previous sample but the analysis of each sample was not always performed within the 24 hour time limit. The Chemistry Section sampling program specified that the samples for TS Action 72 be taken daily and close to the 24 hour time limit with the analysis to be performed soon thereafter. There were no programmatic controls to ensure that the analysis was completed within the specified time limit. This sampling schedule was also applied to other compensatory samples required by the TS and the Offsite Dose Calculation/Manual (ODCM). As a result, there were other instances where the action time limits for analysis of samples were not met resulting in non-compliances of the TS and ODCM.

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Separate in-house and NRC investigations are being conducted regarding apparent 10CFR50.5/10CFR50.9 concerns associated with the February 7, 1996 non-compliance. These investigations are not expected to have bearing on the details provided in this LER.

Analysis of the Event

The consequences of this event were minimal and there was no release of radioactive material to the environment as a result of the sample being obtained late. Additionally, there were minimal consequences and no release of radioactive material as a result of the other instances involving a late sample analysis. No system contaminations or releases above the regulatory limits occurred and therefore the sample analysis was not needed to identify a concern.

Cause of the Event

The cause of the RECW system fluid sample being obtained late was personnel error. The Chemistry technician was aware of the assignment to obtain and analyze the RECW system fluid sample but did not pay sufficient attention to obtain the sample by the set time. Contributing factors include: assignment of other tasks prior to the sampling time that provided a distraction for the technician and 2) the Chemistry Section sampling program specified the samples be collected at the end of specific time limit. The sampling program did not include provisions to compensate for not collecting the sample by the set time.

The cause of the instances where the analyses were not completed within the required time limits was an inadequate Chemistry Section sampling program. The sampling program did not track the completion time of the analysis and did not associate the completion of the analysis with the specified action time limit.

Corrective Actions

On February 11, 1996, the Chemistry Section sample program was revised to schedule collection of compensatory samples at shorter frequencies than the specified limits (e.g., 12 hours for a 24 hour time limit). Additionally, the Chemistry Section personnel were instructed on the requirement to complete the analysis for each sample immediately after the sample was collected and within the specified TS or ODCM time limit.

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The Chemistry technician involved in the event of February 7, 1996, was counseled on the need for attention to detail. The other Chemistry Section personnel were informed of the event, of the need for attention to detail and of the requirement to obtain the sample and complete the analysis within these specified TS or ODCM time interval. Scheduling aids (e.g., stop watches, alarming wrist watches) are being used to assist in reminding the Chemistry technicians of important time limits. The appropriate chemistry procedure will be revised to ensure that both the sampling and analysis are completed within the specified time limits.

A review of the TS, the ODCM, and the Technical Requirements Manual (TRM) was performed to identify all of the actions that include a recurring type action. The Chemistry Section, and the other affected responsible groups are reviewing their programs to ensure that a similar program deficiency does not exist. A preliminary assessment has concluded the deficiency was limited to the Chemistry Section sampling program.

A TS change is currently being evaluated to permit a 25% time extension for the recurring actions. This provision is contained in the improved standard TS (NUREG 1433) and is applicable to the Surveillance Requirements as specified in Limerick's TS Section 4.0.2.

Previous Similar Occurrences

There have been no recent previous similar occurrences.