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MANAGER  
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ELECTRIC PRODUCTION DEPARTMENT

February 13, 1985

Docket No. 50-352

Mr. Thomas T. Martin, Director  
Division of Engineering and Technical Programs  
U.S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

Dear Mr. Martin:

Your letter of January 14, 1985, forwarded Inspection No. 50-352/84-68 which cited an activity at Limerick Generating Station which did not appear to be in full compliance with NRC requirements. This apparent violation is restated below followed by our response.

Finding

Technical Specification 6.3 requires that written procedures be established, implemented, and maintained covering, among other activities, surveillance and test activities of safety-related equipment. Surveillance Test Procedure ST-2-078-402-0, provides requirements for calibrating safety-related chlorine detectors located in the air intake of the Control Enclosure. Section 6 of this procedure requires that "As Found" chlorine detector readout data be compared with the acceptance limits found in Tables 1 through 4 of the procedure. If "As Found" data is found not to be within the specified limits, the detector is to be recalibrated, or if recalibration cannot be performed satisfactorily, shift supervision is to be notified and the detector is to be repaired and/or replaced.

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Contrary to the above, during performance of ST-2-078-402-0, on November 1, 1984 "C" chlorine detector "As Found" trip set point exceeded the acceptance limit specified in Table 2 of the procedure, and the detector was not recalibrated; shift supervision was not notified and the detector was not repaired or replaced.

This is a Severity Level IV violation. (Supplement I)

### Response

On November 27, 1984, a review of Control Enclosure chlorine detector surveillance tests was initiated. It was determined that the calibration surveillance test (ST-2-078-402-0) performed on November 1, 1984 on the "C" detector (AIS-78-016C) contained data which was not within acceptable values. The "As Found" and "As Left" trip set points were 8.17 milliamps. This was higher than the procedure upper acceptable value of 8.16 milliamps which corresponds to the Technical Specification 1 i\* of 0.5 ppm Chlorine. The surveillance test was signed off as "Satisfactory" although the specified test criterion was not met.

During the review of the surveillance test results it was also determined that on the day after the above calibration was performed, ST-2-078-600-0 "Chlorine Detection System-Control Enclosure Air Intake Chlorine Detector, Channels A & C Functional Test" was performed. The functional test, performed every 31 days, also checks the trip set point of AIS-78-016C. This test documented the "As Found" trip set point as above the acceptable limit. As directed by the procedure, the detector was recalibrated and rechecked with the "As Left" trip set point correctly below the acceptable value. As a result of the small deviation from the acceptable value and the short period of time that this condition existed, the technical consequences of this event are small.

Upon discovery of the situation, the responsible instrument technicians were counseled on the importance of properly following procedures and ensuring that "As Left" values are within acceptable limits. This counseling was accomplished prior to the technicians' return to work on November 28, 1984, the day after the problem was discovered.

Mr. Thomas T. Martin

February 13, 1985

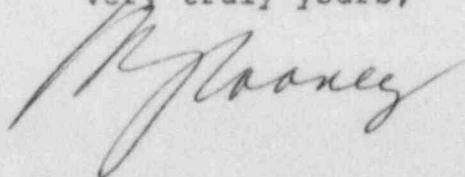
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To prevent recurrence, a training program for the instrument technicians was modified to stress adherence to administrative procedures and the importance of complying with surveillance test requirements. All PECO and vendor instrument technicians have attended this program.

In addition, the once/31 day chlorine detector functional surveillance tests have been revised to provide margin between the acceptable values and the Technical Specification limit. The once/18 month chlorine detector calibration surveillance tests will be revised by May 1, 1985 to provide margin between the acceptable values and the Technical Specification limit. It should be noted that, unlike most instrument specifications in the Technical Specifications, the specification for the chlorine analyzers does not list both a setpoint and an allowable value but rather a setpoint of less than 0.5 ppm.

Should you have any questions or require further information, please contact us.

Very truly yours,



cc: Dr. T. E. Murley, Administrator  
Mr. J. T. Wiggins, Senior Resident Inspector  
See Attached Service List

cc: Judge Helen F. Hoyt  
Judge Jerry Harbour  
Judge Richard F. Cole  
Troy B. Conner, Jr., Esq.  
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Atomic Safety & Licensing Appeal Board  
Atomic Safety & Licensing Board Panel  
Docket & Service Section (3 Copies)  
James Wiggins  
Timothy R. S. Campbell

January 16, 1985