

April 27, 1985

Dear Mr. Thompson,

Re: Phila Elec. Limerick Gen. Sta.
Docket No. 50-352
Unit 1. Startup Testing

We refer to your letter of 4/10/85 to E.G. Bauer in which you mention a letter to Mr. Denton of 3/25/85 which indicates PECO's plan to test operate the turbine-generator, to 5 % of rated power. You state, "We have not identified any conflicts with your plans on this matter..."

On the contrary we have identified several deficiencies and violations from recent NRC inspection reports which add up to the conclusion that PECO is not prepared to operate the plant safely at this time up to 5 % power or to test operate the turbine-generator. We, therefore, ask you to protect our health and safety and that of the public by changing your conclusion from "no objections" to we forbid any test operating of the turbine until the impediments to safe operation listed below have been corrected and resolved.

Region I inspection report 85-03 dated 4/2/85 in Appendix A (See Attachment 1.) states that Tech-Spec-3.6.1.4 was violated from 12/29/84 to 1/30/85 because PECO allowed the two independent MSIV leakage control subsystems to be inoperable. This constituted a serious threat to the public while the reactor was in operation. Operation of the reactor should be suspended until NRC has the assurance that these systems are in order and PECO will maintain them in operation. R.W. Starostecki (p.2.) states that this MSIV-LCS violation "could be symptomatic of an undesirable trend."

Inspection report 85-06, dated 4/10/85, Appendix A, cites two violations which affected the power level of the reactor and which pose serious potential hazards to the public health and safety. PECO allowed the power level of the reactor to be manipulated without the knowledge and consent of a licensed operator, and permitted maintenance work to be done without permission from operation personnel. (See Attachment 2.) A violation of Tech. Spec. 6.8.1 and Reg. Guide 1.33 Rev. 2, App. A, para. 9.e.

On page 11 of this same inspection report which details the unauthorized raising of the reactor power level, under 4.3.3 "Corrective Action Review", Mr. S.D. Ebnetter, Dir. Reactor Safety, finds that the implementation of corrective action has not been developed and that review of these steps, i.e. "three corrective actions to this event" will have to be covered "in a subsequent inspection. This is considered an unresolved item pending NRC review (352/85-06-03)." It is unconceivable that you would allow any test operation of the turbine while these uncertainties as to control of the power level are unresolved.

Inspection report 85-14, reported 4/23/85, (p.5) that "review of the startup test results is in process" and that "a number of changes were required" and "the adequacy of the licensee review of this startup test procedure will be assessed in a subsequent inspection". And para. 2.3 cites exception reports supposedly resolved, "but action still is required to close out the test exception." On page 6, STP-15.2, an unresolved "swap over situation" involving safety systems states, "This problem has persisted during tests of HPCI and RCIC" and "in addition HPCI stop valve experienced erratic behavior... during the pump start... A modification is also planned... These modifications will require retesting of HPCI". Until the problems with these essential safety systems have been completely cured, we are certain that you will not authorize any test operation of turbine-generator.

On behalf of intervenor Anthony/FOE, in recognition of the above obstacles to safe operation of the Limerick reactor, we petition you to exercise your authority to forbid PECO from test operating the turbine-generator.

cc: NRC Staff Counsel, ASLE, Docketing,
PECO, others on Serv. List.

Respectfully submitted,

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ATTACHMENT 1. NRC REGION I INSPECTION REPORT 85-03

4/2/85

APPENDIX A

NOTICE OF VIOLATION

Philadelphia Electric Company
Limerick Generating Station, Unit 1

Docket No. 50-352
License No. NPF-27

As a result of the inspection conducted on January 28 - February 1, 1985 and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), published in the Federal Register Notice (49 FR 8583) dated March 8, 1984, the following violation was identified:

Technical Specification Limiting Condition for Operation 3.6.1.4 requires two independent MSIV leakage control subsystems to be operable in Operational Condition 2.

Contrary to the above, during the period between December 29, 1984 and January 30, 1985, while in Operational Condition 2, the two independent MSIV leakage control subsystems (Inboard and Outboard) were inoperable, in that the circuit breakers for the associated blowers and heaters were misaligned (opened) due to an incorrect surveillance test procedure.

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

Pursuant to the provisions of 10 CFR 2.201, Philadelphia Electric Company is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.

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ATTACHMENT 2. NRC REGION I INSPECTION REPORT 85-06

4/10/85

APPENDIX A

NOTICE OF VIOLATION

Philadelphia Electric Company
Limerick Generating Station
Unit 1
Limerick, Pennsylvania

Docket No. 50-352
License No. NPF-27

As a result of the inspection conducted on January 16 - February 7, 1985, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified.

- A. Code of Federal Regulations 10 CFR 50.54(3)(J) requires in part "Apparatus and mechanisms other than controls, the operation of which may affect the reactivity or power level of a reactor shall be manipulated only with the knowledge and consent of a licensed operator present at the controls". Licensee administrative procedure A-7 in section 5.2.2, states similar requirements.

Contrary to the above, on January 25, 1985, instrumentation and controls personnel in the process of trouble shooting previous indication of erratic recirculation pump flow behavior caused an increase in recirculation pump flow, which increased reactor power, when connecting a recorder to the recirculation flow control circuit. This work was performed without the knowledge and consent of the licensed operators present at the controls.

This is a Severity Level IV Violation (Supplement 1).

- B. Technical Specification 6.8.1. a requires, in part, "written procedures be established as recommended in Appendix A of Regulatory Guide 1.33 Revision 2." Regulatory Guide 1.33, Revision 2, in Appendix A, paragraph 9.e, recommends, in part, "general procedures for the control of maintenance which includes items such as a method for obtaining permission and clearance from operation personnel to work".

Contrary to the above, as of January 25, 1985 controls to assure that permission is obtained from operations personnel prior to performing trouble shooting activities are not contained in general procedures.

This is a Severity Level IV Violation (Supplement I)

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