

## APPENDIX A

### NOTICE OF VIOLATION

Philadelphia Electric Company  
Limerick 1 and 2

Docket No. 50-352 and 50-353  
License No. NPF-39 and NPF-85

During a NRC inspection conducted on October 4 - November 14, 1992, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1992), the violation is listed below:

- A. 10 CFR 50 Appendix B, XVI, Corrective Action, states in part, "In the case of significant condition adverse to quality, measures (for corrective action) shall assure that the cause of the condition is determined and corrective action taken to preclude repetition."

Contrary to the above, the Licensee's corrective actions did not assure that the cause of a condition was determined and that corrective actions precluded repetition. Specifically, on September 15 1992, after the performance of preventive maintenance on a Paul Monroe Electro-Hydraulically operated butterfly valve, HV-76-011B, the inspector identified that the maintenance worker did not follow procedure IC-11-00093 while precharging the valve's accumulator. The maintenance worker did not fully understand the pressure/temperature graph for pressurizing the accumulator and continued working without clarification for the misunderstood portion of the procedure. This is a similar event to violations 50-352/92-03-01 and 50-352/92-11-01, where maintenance workers did not fully understand portions of specified procedures and continued working causing them to violate the procedures. (On April 23, 1992 and July 2, 1992, PECO acknowledged these violations and responded, stating, "Full compliance was achieved on February 13, 1992 and again on April 23, 1992.")

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

- B. 10 CFR Appendix B, Criteria XVI, "Corrective Action," requires that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and non-conformances are promptly identified and corrected.

Contrary to the above the following Reactor Core Isolation Cooling (RCIC) system valve failures were identified by PECO but not promptly corrected:

1. Primary containment isolation valve, 49-2F028, was identified to stick in the closed position on September 3, 1991. No corrective actions were taken until questioned by the NRC resident inspector. During troubleshooting activities on November 4, 1992, the valve stuck in the open position, preventing it from performing its containment isolation function.
2. On November 20, 1991 the RCIC vacuum breaker valve 049-2018 was identified to be sticking in the open position. No corrective actions were taken until an additional similar valve failure occurred and was questioned by the NRC resident inspectors.

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 a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region I, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of receipt of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken to avoid further violations; and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.