

APPENDIX A
NOTICE OF VIOLATION

Philadelphia Electric Company
Limerick Generating Station, Units 1 and 2

Docket Nos. 50-352
50-353
License Nos. NPF-39
NPF-85

As a result of the inspection conducted on August 31 through October 9, 1992, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy) (1992), the following violations were identified:

- A. 10 CFR 50, Appendix B, Criterion XI, requires, in part, that "A test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents. Test results shall be documented and evaluated to assure that test requirements have been satisfied."

Contrary to the above, the design requirements and acceptance limits were not properly translated into test procedures, in that:

1. On and before October 2, 1992, the additional Class 1E batteries loads shown on calculation No. 6600 E.22, Revision 1, calculation No. 6600 E.09, Revision 4A, Appendix IX, and for the HPCI pump discharge valve were not incorporated into the surveillance procedures, Technical Specifications and FSAR.
2. On and before October 2, 1992, the design requirement for a minimum battery voltage of 108 Vdc stated in design calculation No. 6470 E.26, Revision 3, was not incorporated in the Technical Specification surveillance test procedures. The existing surveillance test procedures used a less conservative value of 105 Vdc to demonstrate that 125/250 Vdc batteries will perform satisfactorily in service.
3. On September 29, 1992, the test technician failed to notify the shift supervisor immediately when the as-found time delay of 12 seconds was measured for the 93% degraded voltage with simulated LOCA signal present. This value exceeded the Technical Specifications limit of 11 seconds.

These items collectively constitute 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, if applicable, a copy to the NRC Resident Inspector, within thirty days of the date of the letter which transmitted 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 which 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 this response time.