

ENCLOSURE

NOTICE OF VIOLATION

PECO Energy
Limerick Generating Station
Unit 1

Docket No. 50-352
License No. NPF-39
EA 96-209

During an NRC inspection conducted between May 7 and July 1, 1996, for which an exit meeting was held on July 3, 1996, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the particular violation and associated civil penalty is set forth below:

10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires, in part, that activities affecting quality shall be prescribed by documented instructions, procedures or drawings of a type appropriate to the circumstances.

Contrary to the above, as of September 11, 1995, activities affecting quality were not prescribed by documented instructions, procedures or drawings of a type appropriate to the circumstances in that effective instructions had not been established for a foreign materials exclusion (FME) program to ensure that the suppression pool did not contain materials which could clog the ECCS suction strainers. Specifically, FME procedures for the suppression pool did not contain adequate cleanliness acceptance criteria, and did not provide adequate instructions on how to assess the effects of items dropped into the suppression pool. For example,

1. Procedure A-30, "Housekeeping Requirements," stated that if debris was dropped into the suppression pool and not recovered, it was the responsibility of the work group, who dropped the item, to disposition the issue; however, the procedure did not contain criteria that should be considered if material remained in the suppression pool;
2. Procedures A-30, as well as Procedure A-C-131, "Foreign Material Exclusion," also did not require personnel to track dropped, unrecovered items in the suppression pool in a deficiency tracking system; and
3. Procedure A-30 contained vague acceptance criteria for suppression pool cleanliness requirements in that although the procedure required personnel to inspect the suppression pool prior to plant startup and ensure no foreign material was in the water, the procedure did not contain qualitative or quantitative suppression pool water cleanliness acceptance criteria.

As a result, on September 11, 1995, after a safety relief valve opened and caused the reactor coolant system to depressurize, the A RHR pump was inoperable due to the accumulation of debris on its suppression pool suction strainer. (IFS 01013)

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

The NRC has concluded that information regarding the reason for the violation, the corrective actions taken and planned to correct the violation and prevent recurrence, and the date when full compliance was achieved is already adequately addressed on the docket in LER 95-008, and letters from the Licensee dated October 6, 1995, November 16, 1995, March 1, 1996, June 10, 1996, and August 29, 1996. However, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 if the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to respond, clearly mark your response as a "Reply to a Notice of Violation," and send it 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 Senior Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice).

Dated at King of Prussia, Pennsylvania
this 17th day of October 1996