



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

JUL 22 1985

Docket Nos.: 50-352
50-353

MEMORANDUM FOR: The Atomic Safety and Licensing Appeal Board for Limerick
Christine N. Kohl, Chairman
Gary J. Edles
Dr. Reginald L. Gotchy

FROM: Thomas M. Novak, Assistant Director for Licensing
Division of Licensing

SUBJECT: BOARD NOTIFICATION NO. 85-070
(LIMERICK SECURITY PROGRAM)

In accordance with NRC Procedures for Board Notification copies of an Enforcement Action resulting from NRC Inspection Reports Nos. 50-277/85-11 and 50-352/85-12 are being provided to the Limerick Board. Although the specific actions identified in the single Enforcement Action letter to the licensee (PECO) involve different programs at two sites (radiation protection at Peach Bottom, and security at Limerick) the fundamental NRC concern is the same in each case; namely, inadequate management control by the licensee of licensed activities performed by contractors. Therefore, the complete package, which addresses both the Peach Bottom issue and the Limerick issue, is provided for the Limerick Board's information.

The matters discussed in the Enforcement Action relate to the staff's concern relative to PECO's involvement in the control of contractor performance. Specifically, Inspection Report No. 50-277/85-11 describes deficiencies identified in PECO's control of contractors responsible for providing health physics coverage and performing work activities during an extended refueling outage for recirculation system and residual heat removal system pipe replacements at Peach Bottom, Unit 2. Inspection Report No. 50-352/85-12 addresses deficiencies in PECO's control of licensed activities performed by the contractor guard force at Limerick.

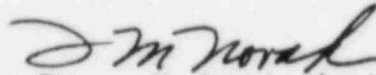
In a related matter, an Office of Investigations Report (OI) No. 1-84-025 addresses apparent falsification of training documents by contract security officers at Limerick. The findings in this OI Report similarly demonstrate that PECO has not adequately monitored the performance of their contractors.

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The OI Report has been referred to the Department of Justice (DOJ) for prosecutorial review. Since the DOJ has indicated that it views the OI Report as a working document between DOJ and the NRC the report is not enclosed with this Board Notification.

These issues are being thoroughly reviewed by IE and Region I to determine significance in terms of impact on plant safety. These presently active issues should not impact on the completion of the Region I inspection program.



Thomas M. Novak, Assistant Director
for Licensing
Division of Licensing

Enclosure:

Letter T. E. Hurley, NRC, to
V. Boyer, PECO, Notice of
Violation and Proposed Imposition
of Civil Penalties dated May 30, 1985.

cc: ACRS (10)
EDO
See next page
Parties to the Proceeding



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
631 PARK AVENUE
KING OF PRUSSIA, PENNSYLVANIA 19406

Enclosure

MAY 30 1985

Docket Nos. 50-277
50-352
License Nos. DPR-44
NPF-27
EA 85-42

Philadelphia Electric Company
ATTN: Mr. V. Boyer
Senior Vice President
Nuclear Power
2301 Market Street
Philadelphia, Pennsylvania 19101

Gentlemen:

- Subjects: A. Notice of Violation and Proposed Imposition of Civil Penalties/
Peach Bottom (NRC Inspection No. 50-277/85-11)
B. Notice of Violation and Proposed Imposition of Civil Penalties/
Limerick (NRC Inspection No. 50-352/85-12)

During recent inspections conducted in February, 1985 at the Peach Bottom Atomic Power Station and the Limerick Generating Station, violations of NRC requirements were identified involving inadequate performance of licensed activities by contractor employees. The violations raise serious questions regarding the adequacy of management oversight provided by Philadelphia Electric Company (PECo) to monitor and control the performance of contractors engaged in licensed activities at your nuclear power plants.

The first inspection was conducted at Peach Bottom Unit 2 on February 13-15, 1985 during an extended refueling outage for Recirculation System and Residual Heat Removal System pipe replacement. The inspection was conducted to review radiological concerns involving two related radiological incidents in which contractor employees were contaminated with radioactive material and received unplanned occupational radiation exposures. Although the exposures were determined not to be in excess of regulatory limits, a potential for such exposures existed. These personnel exposures may have been prevented had licensee management provided an effective administrative radiological control system to ensure that personnel responsible for providing radiological controls were made aware of the scope of the maintenance activities.

PECo's management oversight of the radiological activities was inadequate in that deficiencies in contractor planning, supervision, surveillance, communications, radiological controls, and training were not identified prior to the first incident, nor corrected in time to prevent the second incident. In addition, a licensee supervisor approved the Radiation Work Permit which did not adequately control the radiological hazards associated with either incident.

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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These deficiencies were discussed at an enforcement conference with Mr. J. Cooney and other members of the PECO staff on March 4, 1985. The specific violations associated with these incidents are documented in an inspection report sent to your staff on February 27, 1985, and are described in Appendix A.

The second inspection was conducted at Limerick on February 4-8 and 13, 1985, during which five violations of NRC physical protection requirements were identified. The results of the inspection were discussed with you and other members of the PECO staff during an enforcement conference held on March 11, 1985. The violations, which were documented in an inspection report sent to your staff on March 4, 1985 and which are described in Appendix B, represent a significant degradation in the security program at the Limerick site. PECO's management oversight of these activities was inadequate in that deficiencies in contractor guard force personnel training, supervision, communication, and performance were not promptly identified, allowing adverse conditions to exist for several days without implementation of required contingency measures, notifications and corrective actions.

In addition to our discussions of the security violations at Limerick during the enforcement conference on March 11, 1985, we also discussed our concerns which developed as a result of the NRC's investigation of alleged guard force training records falsification by contractor employees in 1984. This issue was discussed with your staff at the enforcement conference to reinforce our concern that PECO has not provided adequate oversight of the Limerick guard force contractor and to obtain assurance that corrective actions for known problems are promptly initiated. This matter may be the subject of further enforcement action in the future.

These violations and those at the Peach Bottom facility demonstrate that inadequate oversight and control of contractor activities is not limited to the particular facility management, but also involves corporate management. Further, the violations at Limerick represent the second instance in a year of PECO's inadequate control of contractor guard force activities. On October 25, 1984, a Notice of Violation was issued for several violations of physical protection requirements by the contractor guard force at the Peach Bottom Atomic Power Station. On previous occasions, the NRC has expressed concern regarding the adequacy of your control of contractors. For example, in the Systematic Assessment of Licensee Performance (SALP) Report for Peach Bottom covering the period March 1, 1983 through December 31, 1983, the NRC described several incidents which indicated the need for improvement in control of contractors. In your March 27, 1984 response to the SALP Report, you acknowledged the need for additional overview of contractor work, and you indicated that certain actions were taken to improve performance in this area. The recent events at Peach Bottom and Limerick indicate that your actions apparently were not effective in improving management oversight of contractor performance.

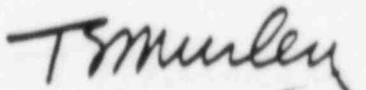
To emphasize the need for increased PECO management oversight and control of contractor performance of licensed activities, I have been authorized, after consultation with the Director, Office of Inspection and Enforcement, to issue the enclosed Notices of Violation and Proposed Impositions of Civil Penalties in the cumulative amount of Seventy-Five Thousand Dollars (\$75,000) for the violations set forth in Appendices A and B. In each case, the violations have been categorized in the aggregate as Severity Level III problems in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985). The base civil penalty for a Severity Level III violation or problem is \$50,000. As set forth in Appendix A, the penalties associated with the health physics violations at the Peach Bottom facility have been reduced by 50% because of your comprehensive corrective actions. However, as set forth in Appendix B, the penalties associated with the security violations at Limerick do not warrant mitigation.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notices when preparing your response. In addition, to enable NRC to determine what actions, if any, should be taken with respect to your license, you are required to submit within 30 days, under the provisions of 10 CFR 50.54(f), a report of your investigation of the incidents of Limerick guard force training records falsification; an explanation of whether these incidents occurred without PECO knowledge, and if so how; a determination of the causes of the falsification, including the responsible individuals; and a description of the actions taken or planned to prevent recurrence of similar incidents. Your written reply to this letter and the results of future inspections will be considered in determining whether further enforcement action is appropriate.

Sections of Appendix B contain details of your security program that have been determined to be exempt from public disclosure in accordance with either 10 CFR 73.21 (Safeguards Information) or 10 CFR 9.5(a)(4) (Commercial or Financial Information). Therefore, the sections so identified will not be placed in the NRC Public Document Room and will receive limited distribution. In your response to this letter and Appendix B, place all Safeguards Information and Commercial or Financial Information in a separate enclosure so that your letter may be placed in the Public Document Room.

The response directed by this letter and the enclosed Notices are not subject to the clearance procedures of the Office of Management and Budget, as required by the Paperwork Reduction Act of 1980, PL 96-511.

Sincerely



Thomas E. Murley
Regional Administrator

Enclosures:

1. Appendix A (Notice of Violation and Proposed Imposition of Civil Penalties - Peach Bottom)
2. Appendix B (Notice of Violation and Proposed Imposition of Civil Penalties - Limerick) (Contains Safeguards, Commercial or Financial Information)

cc w/encls (w/o Safeguards, Commercial or Financial Information):

R. S. Fleischmann, Station Superintendent, Peach Bottom

Shields Daltroff, Vice President, Electric Production

Raymond L. Hovis, Esquire

Thomas Magette, Power Plant Siting, Nuclear Evaluations

John S. Kemper, Vice President, Engineering and Research

G. Leitch, Station Superintendent, Limerick

Troy B. Conner, Jr., Esquire (w/entire Appendix B)

Eugene J. Bradley, Esquire, Assistant General Counsel

Limerick Hearing Service List

NRC Resident Inspector/Peach Bottom (including entire Appendix B)

NRC Resident Inspector/Limerick (including entire Appendix B)

Commonwealth of Pennsylvania

APPENDIX A

NOTICE OF VIOLATION
AND
PROPOSED IMPOSITION OF CIVIL PENALTIES

Philadelphia Electric Company
Peach Bottom Atomic Power Station
Unit 2

Docket No. 50-277
License No. DPR-44
EA 85-42

On February 13-15, 1985, an NRC special safety inspection was conducted to review the circumstances associated with two incidents involving radioactive contamination of contractor employees performing work on weld joints inside a valve and associated piping in the drywell. Although the contamination levels and associated radiation exposures were not in excess of the regulatory limits, a substantial potential for such exposures did exist.

In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985) and pursuant to Section 234 of the Atomic Energy Act of 1954, as amended, ("Act"), 42 U.S.C. 2282, PL 96-295 and 10 CFR 2.205, the violations and the associated civil penalties are set forth below:

- A. Technical Specification 6.11 requires adherence to radiation protection procedures for all operations involving personnel radiation exposure.
1. Radiation protection procedure HPO/CO-4, "Radiation Work Permits," requires, in part, a radiation work permit containing specific requirements for radiological exposure controls whenever work is performed in high radiation areas.

Contrary to the above, on February 10, 1985, work was performed on the interior of valve 81A in the Residual Heat Removal System, a high radiation area, and Radiation Work Permit No. 02-10-5008, "Fit and Weld RHR Pipe and Valves," did not provide specific requirements for radiological exposure control for work performed inside the valve.

2. ALARA Program Instruction 2, a radiation protection procedure, requires, in part, that radiological controls personnel ensure that workers are aware of the radiological status (radiation, contamination and airborne radioactivity levels) of the work area.

Contrary to the above, on February 3 and 10, 1985, at least 7 workers performed inspection, welding, grinding and other activities on weld joint 206 while inside valve 81A or adjacent piping, and radiological controls personnel did not ensure that these workers were aware of the radiological status of that area. This occurred because the radiological controls personnel were not aware of the radiological status within the valve or adjacent piping until after the completion of the work activities.

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3. Radiation protection procedure HPO/CO-100, "Health Physics Guide Used in the Control of Exposure to Radioactive Material," requires, in part, that individuals wear a filter respirator if removable contamination levels are greater than 15 mrad/hr per square foot.

Contrary to the above, on February 10, 1985, a worker inserted his head and torso into valve 81A where removable contamination levels up to 24,000 mrad/hr per square foot were present, and the worker was not wearing a filter respirator.

- B. Technical Specification 6.13 requires, in part, that personnel be made knowledgeable of predetermined dose rate levels if an audible-alarming dosimeter is used to provide primary radiological exposure control during entries into high radiation areas.

Contrary to the above, on February 3 and 10, 1985, audible alarming dosimeters were used to provide primary radiological exposure control during entries into valve 81A, a high radiation area. The dose rates were not established until the completion of the work activities and thus workers were not made knowledgeable of the dose rates prior to their work activities.

- C. 10 CFR 20.201(b) requires each licensee to make or cause to be made such surveys as (1) may be necessary for the licensee to comply with the regulations in 10 CFR Part 20, and (2) are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present. 10 CFR 20.201(a) defines a survey as an evaluation of the radiation hazards incident, among other things, to the presence of radioactive materials under a specific set of conditions.

Contrary to the above, on February 3 and 10, 1985, repeated entries were made by workers into valve 81A to complete work on weld joint 206 and, prior to the entries, an evaluation was not performed of the radiation hazards incident to the presence of radioactive material inside valve 81A.

- D. 10 CFR 20.103(a)(3) requires, in part, for purposes of determining compliance with that section that the licensee use suitable measurements of the concentrations of radioactive materials in air for detecting and evaluating airborne radioactivity in restricted areas.

Contrary to the above, suitable measurements of the concentrations of radioactive materials in air in the valve bonnet of valve 81A were not made during the entries by workers on February 10, 1985. Specifically, the air sample taken from 0810 to 1415 on February 10, 1985

- (1) was not representative of the breathing zones of workers; and
- (2) it averaged air concentrations during periods of inactivity as well as during grinding and welding operations and thus did not record peak concentrations potentially present during those operations.

- E. 10 CFR 20.202(a)(1) requires, in part, that the licensee supply appropriate personnel monitoring equipment to and require the use of the equipment by each individual who enters a restricted area under such circumstances that he receives, or is likely to receive a dose in any calendar quarter in excess of 25% of the applicable value specified in paragraph (a) of 10 CFR 20.101.

Contrary to the above, appropriate personnel monitoring equipment was not supplied and used during grinding and welding of weld joint 206 on February 10, 1985 and workers were likely to receive a dose in excess of 25% of the applicable value specified in paragraph (a) of 10 CFR 2.101, in the following instances:

- (1) Extremity monitoring equipment was not supplied to four workers grinding and welding the weld joint; and
- (2) Supplemental monitoring equipment was not supplied to monitor exposure to the lens of the eyes of those workers.

These violations have been categorized in the aggregate as a Severity Level III problem (Supplement IV).

(Cumulative Civil Penalties - \$25,000 - assessed equally among the violations)

Pursuant to the provisions of 10 CFR 2.201, Philadelphia Electric Company is hereby required to submit to the Director, Office of Inspection and Enforcement, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the Regional Administrator, U.S. Nuclear Regulatory Commission, Region I, 631 Park Avenue, King of Prussia, PA 19406, within 30 days of the date of this Notice, a written statement or explanation, including for each alleged violation: (1) admission or denial; (2) the reasons for the violation, if admitted; (3) the corrective steps which have been taken and the results achieved; (4) the corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, the Director, Office of Inspection and Enforcement, may issue an Order to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken. Consideration may be given to extending the response time for good cause shown. Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

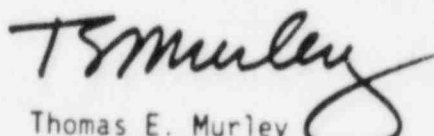
Within the same time as provided for the response required under 10 CFR 2.201, Philadelphia Electric Company may pay the civil penalties by letter addressed to the Director, Office of Inspection and Enforcement, with a check, draft, or money order payable to the Treasurer of the United States in the amount of \$25,000 or may protest imposition of the civil penalties, in whole or in part, by a written answer addressed to the Director, Office of Inspection and Enforcement. Should Philadelphia Electric Company fail to answer within the time specified, the Director, Office of Inspection and Enforcement, will issue an Order imposing the civil penalties proposed above. Should Philadelphia

Electric Company elect to file an answer in accordance with 10 CFR 2.205 protesting the civil penalties, such answer may: (1) deny the violations listed in this Notice in whole or in part; (2) demonstrate extenuating circumstances; (3) show error in this Notice; or (4) show other reasons why the penalties should not be imposed. In addition to protesting the civil penalties, in whole or in part, such answer may request mitigation of the proposed penalties.

In requesting mitigation of the proposed penalties, the five factors contained in Section V(B) of 10 CFR Part 2, Appendix C (1985) should be addressed. Any written answer in accordance with 10 CFR 2.205 should be set forth separately from the statement or explanation in reply pursuant to 10 CFR 2.201, but may incorporate statements or explanations by specific reference (e.g., citing page and paragraph numbers) to avoid repetition. Philadelphia Electric Company's attention is directed to the other provisions of 10 CFR 2.205, regarding the procedures for imposing a civil penalties.

Upon failure to pay any civil penalties due, which have been subsequently determined in accordance with the applicable provisions of 10 CFR 2.205, this matter may be referred to the Attorney General, and the penalties unless compromised, remitted, or mitigated, may be collected by civil action pursuant to Section 234c of the Act, 42 U.S.C. 2282.

FOR THE NUCLEAR REGULATORY COMMISSION


Thomas E. Murley
Regional Administrator

Dated at King of Prussia, Pennsylvania
this 30th day of May 1985

APPENDIX B

NOTICE OF VIOLATION
AND
PROPOSED IMPOSITION OF CIVIL PENALTIES

Philadelphia Electric Company
Limerick Generating Station
Unit 1

Docket No. 50-352
License No. NPF-27
EA 85-42

On February 4-8 and 13, 1985, the NRC conducted an inspection of the physical protection program at Limerick. During the inspection, five violations of NRC requirements were identified. Collectively, the violations indicate inadequate performance by the contractor guard force, including inadequate supervisory response to degraded conditions, and they further demonstrate inadequate management oversight of the guard force by Philadelphia Electric Company (PECo).

In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), and pursuant to Section 234 of the Atomic Energy Act of 1954, as amended ("Act"), 42 U.S.C. 2282, PL 96-295 and 10 CFR 2.205, the violations and the associated civil penalties are set forth below:

A.

THIS PARAGRAPH CONTAINS SAFEGUARDED
INFORMATION. IT IS NOT FOR PUBLIC
DISCLOSURE. IT IS INTENTIONALLY
LEFT BLANK.

B.

THIS PARAGRAPH CONTAINS 2.790(d)
INFORMATION AND IS NOT FOR
PUBLIC DISCLOSURE. IT IS
INTENTIONALLY LEFT BLANK.

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THIS PARAGRAPH CONTAINS SAFEGUARDS
INFORMATION AND IS NOT FOR PUBLIC
DISCLOSURE. IT IS INTENTIONALLY
LEFT BLANK.

- C. Philadelphia Electric Company Limerick Generating Station Physical Security Plan, Chapter 12, dated October 1984 states, in part, "Records and reports required by 10 CFR 73.71(c) will be generated, maintained and forwarded to the NRC as mandated by the regulations."

10 CFR 73.71(c), Reporting of Physical Security Events states, in part, "Each licensee under either a specific or general license shall notify the NRC Operations Center via the Emergency Notification System as soon as possible, and in all cases within one hour, of any event which significantly threatens or lessens the effectiveness of a physical security system as established by regulations in this chapter, or by the licensee's approved physical security, contingency, and security personnel qualification and training plans, or by both."

Contrary to the above, on February 2, 1985, an event occurred which significantly lessened the effectiveness of the physical security plan, and as of February 4, 1985, the NRC Operations Center was not notified via the Emergency Notification System of the occurrence.

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thereby lessening the effectiveness of the physical security plan, and telephone notification was not made to the NRC Operations Center.

- D. Philadelphia Electric Company Limerick Generating Station Physical Security Plan, Chapter 1, dated August 1984, states, in part, "All commitments contained in... Safeguards Contingency Plan will be in place and fully implemented by the date of receipt of the Limerick Generating Station (LGS) Operating License."

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PUBLIC DISCLOSURE. IT IS
INTENTIONALLY LEFT BLANK.

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INFORMATION AND IS NOT FOR
PUBLIC DISCLOSURE. IT IS
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These violations have been categorized in the aggregate as a Severity Level III problem (Supplement III).

(Cumulative Civil Penalties - \$50,000 - assessed equally among the violations.)

Pursuant to the provisions of 10 CFR 2.201, Philadelphia Electric Company is hereby required to submit to the Director, Office of Inspection and Enforcement, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the Regional Administrator, U.S. Nuclear Regulatory Commission, Region I, 631 Park Avenue, King of Prussia, PA 19406, within 30 days of the date of this Notice, a written statement or explanation, including for each alleged violation: (1) admission or denial of the alleged violation; (2) the reasons for the violation, if admitted; (3) the corrective steps which have been taken and the results achieved; (4) the corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, the Director, Office of Inspection and Enforcement, may issue an Order to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken. Consideration may be given to extending the response time for good cause shown. Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

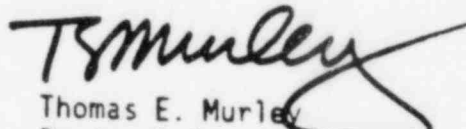
Within the same time as provided for the response required under 10 CFR 2.201, Philadelphia Electric Company may pay the civil penalties by letter to the Director, Office of Inspection and Enforcement, with a check, draft, or money order payable to the Treasurer of the United States in the amount of \$50,000 or may protest imposition of the civil penalties, in whole or in part, by a written answer addressed to the Director, Office of Inspection and Enforcement. Should Philadelphia Electric Company fail to answer within the time specified, the Director, Office of Inspection and Enforcement, will issue an Order imposing the civil penalties proposed above. Should Philadelphia Electric Company elect

to file an answer in accordance with 10 CFR 2.205 protesting the civil penalties, such answer may: (1) deny the violations listed in this Notice in whole or in part; (2) demonstrate extenuating circumstances; (3) show error in this Notice; or (4) show other reasons why the penalties should not be imposed. In addition to protesting the civil penalties, in whole or in part, such answer may request mitigation of the proposed penalties.

In requesting mitigation of the proposed penalties, the five factors contained in Section V(B) of 10 CFR Part 2, Appendix C (1985) should be addressed. Any written answer in accordance with 10 CFR 2.205 should be set forth separately from the statement or explanation in reply pursuant to 10 CFR 2.201, but may incorporate statements or explanations by specific reference (e.g., citing page and paragraph numbers) to avoid repetition. Philadelphia Electric Company's attention is directed to the other provisions of 10 CFR 2.205, regarding the procedures for imposing civil penalties.

Upon failure to pay any civil penalties due, which have been subsequently determined in accordance with the applicable provisions of 10 CFR 2.205, this matter may be referred to the Attorney General, and the penalties unless compromised, remitted, or mitigated, may be collected by civil action pursuant to Section 234c of the Act, 42 U.S.C. 2282.

FOR THE NUCLEAR REGULATORY COMMISSION


Thomas E. Murley
Regional Administrator

Dated at King of Prussia, Pennsylvania
this 30th day of May 1985

DISTRIBUTION LIST FOR BOARD NOTIFICATION

Limerick, Units 1&2, Docket No. 50-352/353

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