

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-5020

M. J. COONEY

MANAGER

NUCLEAR PRODUCTION

ELECTRIC PRODUCTION DEPARTMENT

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

July 15, 1985

Docket Nos. 50-352
50-353

Inspection Report: 50-352/85-16
50-353/85-04

Mr. Samuel J. Collins, Chief
Projects Branch 2, Division of Reactor Projects
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Collins:

Your letter dated June 17, 1985 forwarded Combined
Inspection Report 50-352/85-16; 50-353/85-04 for Limerick
Generating Station. Appendix A of your letter addresses one item
which does not appear to be in full compliance with Nuclear
Regulatory Commission requirements. This item is restated below
followed by our response.

Violation

Technical Specification 6.8.1 requires that plant
administrative procedures be maintained including those
procedures governing the review of safety-related procedures
by the Plant Operations Review Committee (PORC).

Administrative Procedure A-4 implements the licensee's
program for the review of procedures by PORC. A-4 includes
an option for the use of a PORC Subcommittee to conduct the
review provided the PORC Subcommittee Chairman has determined
that an adequate cross-discipline review capability for the
specific procedure is present within the Subcommittee.

Contrary to the above, an adequate cross-discipline review
capability did not exist in the PORC Subcommittee convened to
review revision 2 to ST-5-048-800-1, "SBLC Sodium Pentaborate

8509300033 850715
PDR ADOCK 05000352
G PDR

Concentration Analysis," in that the Subcommittee was comprised of chemistry department personnel without input from any other plant staff organization. Subsequently, the procedure was determined to be inadequate because it did not consider the effect of the low tank water level pump trip setpoint in determining the total available volume in the standby liquid content tank.

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

Response

Admission or Denial of Alleged Violation

We acknowledge the violation as stated above.

Reason for Violation

The violation occurred because the requirements for cross-discipline review in sub-PORC's, as set forth in administrative procedure A-4, were not being followed.

Extent or Significance of Violation

During the period in question, the SBLC tank had frequently contained approximately 200 pounds less than the Technical Specification of 5500 pounds of sodium pentaborate. According to worst-case calculations performed by General Electric, assuming control rods all full out (AFO), SBLC shutdown was not precluded in this condition. Because the reactor was limited to less than 5 percent power during the period in question, this worst-case condition (rods AFO) was never approached. The consequences of this violation were therefore minimal.

In response to the identification of this problem, the Assistant Station Superintendent requested that Electric Production Quality Assurance personnel perform a review to determine adequacy of cross-discipline review by sub-PORC's on 403 Chemistry, Health Physics, Fuel Handling, and Chemistry surveillance test procedures. Of these 403 procedures, 102 should have had a cross-discipline review. Seventy-one did not receive adequate cross-

discipline review, thus allowing a potential for technical errors.

Corrective Actions Taken and Results Achieved

A special review of these 71 procedures was conducted by Technical Engineering personnel. Other than the previously identified error in ST-5-048-800-1, no technical problems which would cause Technical Specification violations or operational problems were identified. This review was completed on May 22, 1985. ST-5-048-800-1 was revised to correct the error identified by this violation on March 22, 1985. This item is closed according to your inspection report dated June 25, 1985, which forwarded combined reports 50-352/85-25 and 50-353/85-06.

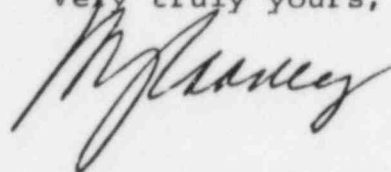
Corrective Actions to be Taken to Avoid Future Non-Compliance

To clarify and emphasize the need for cross-discipline review in sub-PORC's and to reduce the probability of recurrence, a memo from the Assistant Station Superintendent was sent to all PORC members re-emphasizing the need for cross-discipline reviews and redefining the requirements in administrative procedure A-4 on these reviews.

Date When Full Compliance Will Be Achieved

All corrective actions for this violation have been completed as stated in this response.

Very truly yours,



cc: E. M. Kelly, Senior Resident Site Inspector
See Attached Service List

cc: Judge Helen F. Hoyt
Judge Jerry Harbour
Judge Richard F. Cole
Troy B. Conner, Jr., Esq.
Ann P. Hodgdon, Esq.
Mr. Frank R. Romano
Mr. Robert L. Anthony
Ms. Phyllis Zitzer
Charles W. Elliott, Esq.
Zori G. Ferkin, Esq.
Mr. Thomas Gerusky
Director, Penna. Emergency Management Agency
Angus Love, Esq.
David Wersan, Esq.
Robert J. Sugarman, Esq.
Kathryn S. Lewis, Esq.
Spence W. Perry, Esq.
Jay M. Gutierrez, Esq.
Atomic Safety & Licensing Appeal Board
Atomic Safety & Licensing Board Panel
Docket & Service Section (3 Copies)
E. M. Kelly
Timothy R. S. Campbell

July 3, 1985