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U.S.NUCLEAR REGULATORY COMMISSION

2.206 Request

Re: PHILA. ELEC. CO. Limerick Nuclear Gen Sta. Docket No. 50-352,353OL

April, 5,1985

APPEAL BY R.L.ANTHONY/FOE FROM REFUSAL OF NRC DIRECTOR OF REACTOR REGULATION TO ACT ON OUR PETITION OF 12/23/84 TO SERVE A SHOW CAUSE ORDER, AND OUR REQUEST FOR RECONSIDERATION, 2/25/85; AND FOR AN ORDER FROM THE COMMISSION.

'85 APR -8 P4:02

On 12/23/85 we submitted a petition to the Director of Inspection and Enforcement to issue a show cause order to start proceedings to revoke low power license NPF-27. We included substantiating evidence and references to show that PECo is not able to operate the Limerick reactor safely.

After a delay of 1½ months Mr.H.Denton replied that our petition did not require any immediate action and he declined to take any immediate action. We replied to Mr. Denton's letter on 2/25/85, asking for reconsideration and submitting further evidence from PECo's operation to date, of the faults in equipment and operator performance which demonstrated further PECo's inability to operate without endangering the public, NRC staff, and PECo employees. In a 3/26/85 letter Mr. Denton again "decline(d) to take any immediate action".

It is now more than three months since our petition for a show cause order, and PEC's operating record contains many more reports of violations and repeated errors which at higher levels of operation could have brought on a serious accident and threat to the public health and safety. We believe themDirector's withholding of action on our petition amounts to a delaying tactic which threatens our health and safety under PECo's imminent ascension to levels above 5 %, (See letter Daltroff to Denton 3/25/85), predicting a full power license in April.

We hereby petition the Commission to order the Director to issue a show cause order and to institute a hearing process on the revoking of the low power license. We further petition the Commission to order the reactor to be held in a shut down state until a decision on revoking the license has been made.

We present further evidence of PECo's inability to operate the reactor safely:

Conditions required under the license have not been satisfied as follows:

IMPIGEMENT LOADS ON PIPES & SUPPORT (Torrey Pines)	3/8/85	R.E.Martin to PECo.
REDUNDANCY IN REMOTE SHUTDOWN CAPABILITY	3/6/85	A.Schwencer to E.G. Bauer
DETAILED CONTROL ROOM DESIGN REVIEW	3/14/85	" " " " "
SAFETY PARAMETER DISPLAY SYSTEM	3/27/85	" " " " "

The reactor cannot be safely operated until there has been a complete check on all safety systems and re-training of operators and supervisors to eliminate the possibility of process and equipment failure with consequences for accidents as indicated below :

- -Safety-related equipment removed from service without permission, Violation 85-02 and Control Room HVAC system change without NRC approval, Violation 85-01
- INspection 85-11 possible diesel fire pump flywheel crack, p.5: troubleshoot p.19
- For 4 hours containment isolation valves inoperable, Inspection 85-08, 1/15/85.
- For 7½ hours without protection of volume level switch, LER 85-14, 1/18/85.
- Tag-out operated by construction/craft personnel instead of PECo, LER 85-15,
- Repeated isolation of RWCU as in LERs 85-25, 85-27("cause of event remains under investigation") and previous LERs 84-12, 26, 34, 35, 36.
- Repeated scrams and half scrams from loss of power to safety systems, LER 85-24 and LERs, 84-05, 39, and 85-07.

We petition the Commission to order a show cause order and to require a hearing to take testimony as to the revoking of the licenseNPF-27, and in the interval to suspend operation of the Limerick reactor.

Respectfully submitted,

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Cc: NRC ASLB, Staff Counsel, Docketing Serv., PECo, H. DENTON, OTHERS ON SERV. LIST.

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