

September 29, 1999

Mr. G. Rainey, President
PECO Nuclear
Nuclear Group Headquarters
Correspondence Control Desk
P.O. Box 195
Wayne, PA 19087-0195

SUBJECT: MID-CYCLE PLANT PERFORMANCE REVIEW (PPR) - LIMERICK
GENERATING STATION

On September 13, 1999, the NRC staff completed the mid-cycle Plant Performance Review (PPR) of the Limerick Generating Station. The staff conducted these reviews for all operating nuclear power plants to integrate performance information and to plan for inspection activities at your facility through March 2000. The focus of this performance review was to identify changes in performance over the past six months, and to allocate inspection resources accordingly.

We did not identify any areas in which your performance warranted additional inspection beyond the core inspection program. Based on this review, we plan to conduct core inspections at your facility over the next six months.

Enclosure 1 contains a historical listing of plant issues, referred to as the Plant Issues Matrix (PIM), that were considered during this PPR process to arrive at an integrated review of licensee performance trends. The PIM includes items summarized from inspection reports or other docketed correspondence between the NRC and PECO Energy from September 1998 through July 1999. As noted above, greater emphasis was placed on those issues identified in the past six months during this performance review. The NRC does not attempt to document all aspects of licensee programs and performance that may be functioning appropriately. Rather, the NRC only documents issues that the NRC believes warrant management attention or represent noteworthy aspects of performance. In addition, the PPR may also have considered some predecisional and draft material that does not appear in the attached PIM, including observations from events and inspections that had occurred since the last NRC inspection report was issued, but had not yet received full review and consideration. This material will be placed in the Public Document Room as part of normal issuance of NRC inspection reports and other correspondence.

This letter advises you of our plans for future inspection activities at your facility so that you will have an opportunity to prepare for these inspections and to provide us with feedback on any planned inspections which may conflict with your plant activities. Enclosure 2 details our inspection plan through March 2000 to coincide with the scheduled implementation of the revised reactor oversight process in April 2000. Resident inspections are not listed due to their ongoing and continuous nature.

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Mr. G. Rainey

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If circumstances arise which cause us to change this inspection plan, we will contact you to discuss the change as soon as possible. Please contact me at (610) 337-5233 with any questions you may have.

Sincerely,

Original Signed By:

Curtis J. Cowgill, Chief
Reactor Projects Branch 4
Division of Reactor Projects

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

Enclosures: 1. Plant Issues Matrix
2. Inspection Plan

cc.

cc w/encl:

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G. Edwards, Chairman, Nuclear Review Board
J. A. Hutton, Director - Licensing, PECO Nuclear
J. von Suskil, Vice President - Limerick Generating Station
M. P. Gallagher, Plant Manager, Limerick Generating Station
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DATE	09/29/99	09/29/99					

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United States Nuclear Regulatory Commission PLANT ISSUE MATRIX

By Primary Functional Area

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Region 1
LIMERICK

Date	Source	Functional Area	ID	Type	Template Codes	Item Title Item Description
07/23/1999	1999302	Pri: OPS	NRC	NEG	Pri: 1C	Operating Test Administration and Performance
Dockets Discussed:		Sec:			Sec:	A performance deficiency was identified during the performance of a JPM when an applicant, while operating the refueling bridge under the direction of a fuel handling director (FHD), allowed the mast to make contact with the south fuel prep machine handrail. The mast was in the normal up position with no fuel grappled. Although the contact was minor and no damage resulted, the event indicated a lack of oversight on the part of the FHD and inattentiveness on the part of the applicant.
05000352 LIMERICK 1		Ter:			Ter:	
05000353 LIMERICK 2						The licensee immediately addressed the issue and subsequently issued PEP #I0009971. Corrective actions were incomplete at the time of this report.
07/23/1999	1999302	Pri: OPS	NRC	NEG	Pri: 1C	Miscellaneous Operations Issues
Dockets Discussed:		Sec:			Sec:	An exam security problem was identified by PECO involving exam material previously copied by a PECO exam team member and later discovered in the same copy machine by another PECO exam team member.
05000352 LIMERICK 1		Ter:			Ter:	The examiner determined based on the timeline developed by PECO, through interviews with those involved, and re-enactment of the event, that the event was minor and the exam was not compromised. Additionally, investigation of the event and subsequent corrective actions taken by the licensee were found to be acceptable. PECO PEP #I0009971 describes the problem and the corrective actions.
05000353 LIMERICK 2						
07/23/1999	1999302	Pri: OPS	NRC	NEG	Pri: 1C	Examination Preparation and Quality
Dockets Discussed:		Sec:			Sec:	The submitted written exam required revision on five of 65 questions due to either the question lacking stem focus or being unrelated to the required subject area. No revision was required on the operating exams. Facility personnel subsequently incorporated changes in the final exams.
05000352 LIMERICK 1		Ter:			Ter:	
05000353 LIMERICK 2						
07/23/1999	1999302	Pri: OPS	NRC	POS	Pri: 1C	Examination Preparation and Quality
Dockets Discussed:		Sec:			Sec:	The facility used an examination preparation team of experienced instructors who assisted the NRC examiners in an excellent manner.
05000352 LIMERICK 1		Ter:			Ter:	
05000353 LIMERICK 2						
06/14/1999	1999004-01	Pri: OPS	Licensee	NCV	Pri: 3C	Late Performance of a Technical Specification required off-gas grab sample
Dockets Discussed:		Sec:			Sec: 3B	LER 1-99-006 reported the late performance of an off-gas grab sample when the off-gas hydrogen analyzers were inoperable and the steam jet air ejectors and off-gas systems were in-service. The event occurred when an individual inappropriately signed-off an integrated startup procedure step indicating the hydrogen analyzers were in-service. This incorrect procedure notation led to the late performance of an off-gas grab sample and consequently the failure to comply with TS 3.7.12 and TS 3.11.2.5. This Severity IV violation is being treated as a Non-Cited violation, consistent with Appendix C of the NRC Enforcement Policy. This violation is in the PECO's corrective action program as PEP I0009941.
05000352 LIMERICK 1		Ter:			Ter:	
05000353 LIMERICK 2						
06/11/1999	1999004	Pri: OPS	NRC	NEG	Pri: 1B	Reactor Water Level Operator Work-Around
Dockets Discussed:		Sec:			Sec:	Prior to the Unit 1 automatic scram on June 11, 1999, PECO had not included a long standing instrumentation issue (momentary reactor water level spike indication following a turbine trip from high power) in PECO's program for operator work-arounds. PECO's corrective actions for this issue were adequate.
05000352 LIMERICK 1		Ter:			Ter:	

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Region 1
LIMERICK

Date	Source	Functional Area	ID	Type	Template Codes	Item Title Item Description
06/11/1999	1999004	Pri: OPS Sec:	NRC	NEG	Pri: 3A Sec: 3C Ter:	Personnel Errors Related to Unit-1 Scram Operators responded appropriately to the June 11, 1999, automatic scram on Unit 1. The scram was caused by a personnel error during performance of a procedure for a routine turbine overspeed test. Two other personnel errors involving procedure use were noted during the event recovery and subsequent startup which resulted in missed technical specification surveillance activities.
06/11/1999	1999004	Pri: OPS Sec:	NRC	NEG	Pri: 5A Sec: Ter:	Unit 1 Post Scram Review Although PECO's post-scram review of the June 11, 1999, automatic scram on Unit 1 was adequate, the review missed several documentation deficiencies regarding event details and unified control room log entries.
05/24/1999	1999003	Pri: OPS Sec:	NRC	POS	Pri: 1A Sec: Ter:	Unit 2 Refueling Outage Control room and refueling platform operators conducted shutdown and refueling activities well. Operators made effective use of procedures and peer-checking during the outage. PECO management's oversight of the outage provided effective support for station and contractor personnel and ensured that the outage was conducted safely.
05/24/1999	1999003	Pri: OPS Sec:	NRC	POS	Pri: 1B Sec: 5B Ter:	Automatic Shutdown From Full Power - Unit 1 The control room staff's response to the complete loss of feedwater event and automatic reactor shutdown from full power was excellent. The operators successfully dealt with the several equipment failures that challenged them following the automatic reactor shutdown. PECO's review and interim corrective actions were adequate to support safe restart of Unit 1.
04/12/1999	1999002	Pri: OPS Sec:	NRC	NEG	Pri: 3A Sec: Ter:	Removal of risk significant systems from service The operations staff did not perform a recommended risk assessment prior to removal of a train of the RERS from service to perform non-critical maintenance. As a result, the combined effect of the RERS train unavailability and a concurrent standby gas treatment problem was not evaluated for risk increase. In addition, the removal of RERS approximately 12 hours prior to the start of maintenance work resulted in unnecessary system unavailability.
04/12/1999	1999002	Pri: OPS Sec:	Licensee	STR	Pri: Sec: Ter:	Equipment operator identifies defective relay (gray-boot). During a plant tour an equipment operator identified that a portion of the isolation logic for the shutdown cooling mode of the residual heat removal system was de-energized. PECO determined the event was caused by an open circuit at a Grayboot connector as a result of over crimping. PECO performed a thorough analysis including destructive examination of other Grayboot connectors to conclude that a generic issue involving the connectors did not exist.

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By Primary Functional Area

Region 1
 LIMERICK

Date	Source	Functional Area	ID	Type	Template Codes	Item Title Item Description
03/26/1999	1999301	Pri: OPS	NRC	NEG	Pri: 1C	Operations
<p>Dockets Discussed: 05000352 LIMERICK 1 05000353 LIMERICK 2</p> <p>Overall, the as-submitted examination material was acceptable with some exceptions. Five of 125 written exam questions required revision due to either being too easy or not evaluating at the appropriate level. Additionally, the operating test contained one JPM out of 20 which was also too easy and required replacement. Facility personnel subsequently incorporated changes in the final exams. Post-exam facility comments reflected needed technical corrections for five of the written exam questions, and also indicated a lack of thorough review on those questions by the facility during the examination preparation phase.</p>						
03/26/1999	1999301	Pri: OPS	NRC	NEG	Pri: 3B	Operations
<p>Dockets Discussed: 05000352 LIMERICK 1 05000353 LIMERICK 2</p> <p>Positive observations were noted on the simulator test in the area of communications and teamwork. However, three of nine applicants exhibited unsatisfactory individual knowledge of the reactor automatic depressurization system indicating a potential problem in the initial operator program.</p>						
03/26/1999	1999301	Pri: OPS	NRC	POS	Pri: 1C	Operations
<p>Dockets Discussed: 05000352 LIMERICK 1 05000353 LIMERICK 2</p> <p>The facility used an examination preparation team of experienced instructors who assisted the NRC examiners in an exceptional manner.</p>						
03/01/1999	1999001	Pri: OPS	NRC	POS	Pri: 1C	Reactor Man. Control Sys. Safety Eval. Review
<p>Dockets Discussed: 05000352 LIMERICK 1 05000353 LIMERICK 2</p> <p>PORC performed a thorough and probing review of the safety evaluation addressing a plant condition that potentially rendered all hydraulic control unit accumulators inoperable. The PORC resolved to submit a Technical Specification change request to clarify the TS requirements.</p>						
03/01/1999	1999001	Pri: OPS	NRC	POS	Pri: 3A	Steam Jet Air Ejector Radiation Monitor Inoperable-Unit 1
<p>Dockets Discussed: 05000352 LIMERICK 1</p> <p>The shift manager demonstrated an excellent questioning attitude during his review of the results of troubleshooting activities for a faulty steam jet air ejector radiation monitor. Operators declared the instrument inoperable which led to further engineer review that resulted in fully diagnosing the radiation monitor problem and appropriate repairs.</p>						
03/01/1999	1999001-01	Pri: OPS	Licensee	NCV	Pri: 1A	Two RCIC PCIVs simultaneously inoperable from different causes - Unit 2
<p>Dockets Discussed: 05000353 LIMERICK 2</p> <p>Operations personnel left the RCIC steam line warmup bypass valve partially open in November 1998 causing the valve to be inoperable. The redundant containment isolation valve was also open and inoperable at the same time for short durations due to planned maintenance. This Severity IV violation, of TS 3.6.3, is being treated as a Non-Cited Violation, consistent with Appendix C of the NRC Enforcement Policy. This violation is in the licensee's corrective action program as PEP 10009263. PECO's corrective actions adequately addressed this issue.</p>						

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Region 1
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Date	Source	Functional Area	ID	Type	Template Codes	Item Title Item Description
01/11/1999	1998010	Pri: OPS Sec:	NRC	POS	Pri: 1A Sec: 3A Ter:	Control Room Supervisor Oversight The control room supervisor's oversight of control room activities has improved since operations management redirected incoming telephone communications to the work control supervisor.
Dockets Discussed:						
05000352	LIMERICK 1					
05000353	LIMERICK 2					
01/11/1999	1998010	Pri: OPS Sec:	NRC	POS	Pri: 1A Sec: 5B Ter:	Operator Performance During the Unit 1 Shutdown Control room operators performed well during the December 4, 1998 Unit 1 reactor shutdown. Anomalous control rod position indication was handled appropriately by the operators during the shutdown. The licensee actions to allow restart of Unit 1, based on the anomalous control rod position indication, and long term corrective actions were acceptable.
Dockets Discussed:						
05000352	LIMERICK 1					
05000353	LIMERICK 2					
11/30/1998	1998009	Pri: OPS Sec:	Licensee	NEG	Pri: 3A Sec: 5B Ter:	Mispositioned Control Rod During Exercise Test A reactor operator mispositioned a control rod during the performance of the control rod exercise test due to distractions within the control room. PECO's corrective actions focused on correcting operator behaviors but did not initially address eliminating other causal factors that distracted the operator. Further, weaknesses were identified related to the documentation of control rod movement abnormalities and resolution of these abnormalities which are potential operator distractions.
Dockets Discussed:						
05000352	LIMERICK 1					
05000353	LIMERICK 2					
11/30/1998	1998009	Pri: OPS Sec:	NRC	NEG	Pri: 5A Sec: Ter:	Licensee Self-Assessment Activities Plant management was not appropriately informed by plant staff of a procedural adherence deficiency relevant to the mis-located alignment pin for the shipping cask inner closure lid during a presentation at the Senior Leadership Meeting. However, following NRC intervention, plant management responded well by stopping further cask loading operations.
Dockets Discussed:						
05000352	LIMERICK 1					
05000353	LIMERICK 2					
11/30/1998	1998009	Pri: OPS Sec:	NRC	POS	Pri: 1A Sec: Ter:	Conduct of Operations Conduct of operations at Limerick Units 1 and 2 was professional and focused on safety principles. Operators demonstrated safe and conservative decision making during the two forced load reductions at Unit 1 due to high vibrations on the 1B condensate pump.
Dockets Discussed:						
05000352	LIMERICK 1					
05000353	LIMERICK 2					
10/17/1998	1998008	Pri: OPS Sec:	NRC	STR	Pri: 1C Sec: Ter:	LSRO Requalification Program In structure, the LSRO program was good overall. The program guidelines and examinations were comprehensive and well maintained by the program coordinator and LSRO license maintenance was well documented. The inspector also determined that the areas of exam security, remediation, operator feedback, and medical records were acceptable.
Dockets Discussed:						
05000352	LIMERICK 1					
05000353	LIMERICK 2					

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Date	Source	Functional Area	ID	Type	Template Codes	Item Title Item Description
10/17/1998	1998008-01	Pri: OPS Sec:	Licensee	NCV	Pri: 2B Sec: Ter:	Condition prohibited by TS in that the main condenser offgas pre-treatment radiation monitor was inoperable LER 50-353/2-98-003 described a condition prohibited by Technical Specifications in that the main condenser offgas pre-treatment radiation monitor was inoperable and would not have alarmed as required during a high radiation condition due to a procedural deficiency. This licensee identified issue is being treated as a Non-Cited Violation.
Dockets Discussed: 05000353 LIMERICK 2						
07/12/1999	1999004	Pri: MAINT Sec:	NRC	POS	Pri: 5A Sec: Ter:	Nuclear Maintenance Division Refueling Activities The Nuclear Maintenance Department (NMD) management had recognized that performance had degraded in 1998 in the execution of refueling activities at Limerick and Peach Bottom. NMD management evaluated the performance deficiencies in aggregate and implemented appropriate corrective actions. The associated actions implemented prior to the recent Limerick refueling outage resulted in improved performance.
Dockets Discussed: 05000352 LIMERICK 1 05000353 LIMERICK 2						
06/23/1999	1999004	Pri: MAINT Sec:	NRC	NEG	Pri: 4B Sec: 3A Ter:	High Pressure Coolant Injection Failure to Start The Unit 1 high pressure coolant injection (HPCI) failure to start on June 23, 1999 was a maintenance preventable functional failure. PECO missed the opportunity to prevent the HPCI failure by not adequately reviewing prior industry experience, which recommended replacement of a component in the turbine's governor electro-hydraulic regulator following water intrusion into the HPCI oil system. Water intrusion had occurred during the extended HPCI operation on April 20, 1999. Additionally, a personnel error during the corrective maintenance extended the HPCI system outage time.
Dockets Discussed: 05000352 LIMERICK 1 05000353 LIMERICK 2						
05/24/1999	1999003	Pri: MAINT Sec:	NRC	POS	Pri: 1C Sec: Ter:	Inservice Inspection (ISI) Program Review The Limerick Generating Station Unit 2 inservice inspection program for the first 10 year interval was conducted as per the requirements of Sections V and XI of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code. Acceptable procedures and calibrated equipment were used by qualified and certified personnel to conduct the various types of examinations. Inspection results were comprehensively documented.
Dockets Discussed: 05000352 LIMERICK 1 05000353 LIMERICK 2						
05/24/1999	1999003	Pri: MAINT Sec:	NRC	POS	Pri: 1C Sec: Ter:	Oversight of Vendor NDE Activities The non destructive examination vendor oversight plan was comprehensive and effective.
Dockets Discussed: 05000352 LIMERICK 1 05000353 LIMERICK 2						
05/24/1999	1999003	Pri: MAINT Sec:	NRC	POS	Pri: 2A Sec: 3A Ter: 1C	Core Shroud Ultrasonic Examination - Unit 2 The baseline ultrasonic testing (UT) inspection of the core shroud was performed in accordance with a core shroud inspection plan submitted in response to Generic Letter (GL) 94-03. The UT examination of the core shroud circumferential welds found several indications in circumferential welds. Analyses of the effect of indications indicated that operation until the next refueling outage (2R06) was acceptable.
Dockets Discussed: 05000352 LIMERICK 1 05000353 LIMERICK 2						

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Region 1
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Date	Source	Functional Area	ID	Type	Template Codes	Item Title Item Description
04/12/1999	1999002	Pri: MAINT Sec:	NRC	NEG	Pri: 2A Sec: Ter:	Plant housekeeping The inspector observed that the housekeeping and general area material condition had degraded, particularly in the vicinity of fire barrier upgrades. Corrective actions to resolve the deficiencies were appropriate.
Dockets Discussed:						
05000352	LIMERICK 1					
05000353	LIMERICK 2					
04/12/1999	1999002	Pri: MAINT Sec:	NRC	POS	Pri: 3A Sec: Ter:	Safeguards 1B1 battery replacement -Unit 1 The 1B1D101 125vdc battery replacement activity was well planned and executed. Maintenance technicians were highly knowledgeable of all aspects of the battery activities.
Dockets Discussed:						
05000352	LIMERICK 1					
04/12/1999	1999002-01	Pri: MAINT Sec:	Licensee	NCV	Pri: 2B Sec: Ter:	Failure to perform a TS surveillance required locked-valve inspection. LER 1-99-002 reported a failure to perform a required Technical Specification locked-valve inspection. The required component had been inadvertently deleted from the surveillance procedure during a revision due to personnel error and an inadequate review. This Severity Level IV violation of Technical Specifications is being treated as a Non-Cited Violation consistent with Appendix C of the NRC Enforcement Policy. This violation is in PECO's corrective action program as PEP 10009525.
Dockets Discussed:						
05000352	LIMERICK 1					
03/01/1999	1999001	Pri: MAINT Sec:	NRC	POS	Pri: 5C Sec: Ter:	Troubleshooting & repair of drywell chilled water valve HV-087-120B - Unit 1 PECO's actions to perform an internal valve inspection to confirm operability of HV-087-120B, a primary containment isolation valve, demonstrated conservative decision making and a focus on early identification and resolution of equipment problems.
Dockets Discussed:						
05000352	LIMERICK 1					
05000353	LIMERICK 2					
01/11/1999	1998010	Pri: MAINT Sec:	NRC	POS	Pri: 2B Sec: Ter:	Maintenance Outage Controls PECO effectively controlled and coordinated the Unit 1 maintenance outage (1M32). All planned and emergent work items were successfully completed. Emergent work items were appropriately identified, evaluated and addressed during the outage. Effective plant management oversight and clear communication contributed to a safe and event-free outage.
Dockets Discussed:						
05000352	LIMERICK 1					
05000353	LIMERICK 2					
11/30/1998	1998009-01	Pri: MAINT Sec:	NRC	VIO IV	Pri: 3A Sec: 3C Ter:	Spent Fuel Shipment Preparations Overall, PECO and supporting contractors did not effectively plan, prepare for, or implement the irradiated fuel shipment. Technicians were challenged by a procedure that was technically flawed, in part as a result of an inadequate review by the task vendor. PECO did not provide adequate levels of quality verification and oversight commensurate with the potential safety significance associated with this infrequently performed activity. In two instances procedures were not followed precisely and in one of these cases technicians exercised poor judgement and deviated from a procedure in an attempt to resolve a problem without involving management or implementing the appropriate change process. This represented a violation of Technical Specification 6.8.1 a. In addition, technicians attempted to resolve emergent problems without informing the control room.
Dockets Discussed:						
05000352	LIMERICK 1					
05000353	LIMERICK 2					

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Region I
LIMERICK

Date	Source	Functional Area	ID	Type	Template Codes	Item Title Item Description
11/30/1998	1998009-02	Pri: MAINT Sec:	Licensee	NCV	Pri: 3A Sec: 2B Ter:	Average Power Range Monitor Gain Measurement & Adjustment Missed Surveillance LER 2-98-005 described a condition prohibited by Technical Specifications in which an average power range monitor (APRM) surveillance test had been missed. The cause of the missed test was the removal of the surveillance activity from the schedule based on a personnel error involving a faulty assumption. This licensee identified issue is being treated as a Non-Cited Violation.
10/17/1998	1998008	Pri: MAINT Sec:	NRC	POS	Pri: 1B Sec: 2A Ter: 3A	Load Center Transformer Failure Operator recognition and response for the Unit 2 transformer failure was excellent resulting in minimal impact and the timely restoration of the plant to a normal condition. The transformer replacement, testing and restoration were well coordinated and performed without error.
10/17/1998	1998008	Pri: MAINT Sec:	NRC	POS	Pri: 2B Sec: Ter:	Maintenance Rule Program Observations The expert panel performed its assigned function well and ensured the consistent implementation of the maintenance rule in accordance with the program requirements.
10/17/1998	1998008	Pri: MAINT Sec:	NRC	POS	Pri: 2B Sec: Ter:	Preventive Maintenance Program Review Station personnel implemented the preventive maintenance program consistent with administrative procedures. Safety related preventive maintenance tasks were typically performed at the frequencies established by the program guidelines. Although one UFSAR discrepancy was identified, the licensee was already aware of and in the process of resolving the inconsistency.
10/17/1998	1998008-02	Pri: MAINT Sec:	Licensee	NCV	Pri: 3A Sec: 2B Ter:	Failure to meet undervoltage channel calibration technical specification surveillance requirement. LER 50-353/2-98-006 described a condition prohibited by Technical Specifications involving the failure to perform an emergency bus undervoltage channel calibration within period specified. The due date for this monthly surveillance test was missed primarily as a result of a personnel error involving I&C's failure to notify the control room staff that the end of the grace period for this test was approaching. This licensee identified issue is being treated as a Non-Cited Violation.
05/24/1999	1999003	Pri: ENG Sec:	NRC	POS	Pri: 3A Sec: 3B Ter: 4B	Quality Assurance Inspection of Vendor Installed Darmatt KM1 Fire Barrier System The quality assurance inspectors were very knowledgeable about the Darmatt KM1 fire barrier system installation and inspection requirements. The quality assurance inspectors provided good quality assurance oversight of the vendor installed product.

United States Nuclear Regulatory Commission PLANT ISSUE MATRIX

By Primary Functional Area

Region 1
LIMERICK

Date	Source	Functional Area	ID	Type	Template Codes	Item Description
05/24/1999	1999003	Pri: ENG	NRC	POS	Pri: 3A Sec: 4B Ter:	Engineering Oversight of Vendor Supplied Cable Ampacity Derating Calculations PECO provided good oversight of engineering calculations performed by contractors. Safe shutdown cable ampacity calculations were well organized, and the methodology was consistent with established industry practices.
Dockets Discussed:						
05000352	LIMERICK 1					
05000353	LIMERICK 2					
05/24/1999	1999003	Pri: ENG	NRC	POS	Pri: 4B Sec: 1C Ter:	Engineering Oversight of Contractor Designed and Installed Sprinkler Modifications PECO provided good oversight of contractor activities involving sprinkler modifications. The reviewed sprinkler modifications were well organized and the methodology was consistent with established industry practices. The calculations were appropriate to reflect the as-built system condition.
Dockets Discussed:						
05000352	LIMERICK 1					
05000353	LIMERICK 2					
05/24/1999	1999003	Pri: ENG	NRC	POS	Pri: 4B Sec: 3A Ter:	Engineering Review and Closeout of Contractor Designed and Installed Datmatt KM1 Systems The Datmatt KM1 design, installation and engineering dispositions were thorough and complete and PECO provided good oversight of the vendors' activities.
Dockets Discussed:						
05000352	LIMERICK 1					
05000353	LIMERICK 2					
05/24/1999	1999003	Pri: ENG	NRC	POS	Pri: 4B Sec: 3A Ter: 3B	Engineering Oversight of Miscellaneous Contractor Design and Installed Datmatt KM1 Systems PECO provided appropriate oversight of the vendors' activities involving, control room recorder replacements, reactor protection system instrument relocation during the main turbine retrofit and main steam relief valve replacement.
Dockets Discussed:						
05000352	LIMERICK 1					
05000353	LIMERICK 2					
04/12/1999	1999002-02	Pri: ENG	NRC	NCV	Pri: 5A Sec: 5B Ter: 5C	Fire safe shutdown deficiencies Overall PECO's identification of fire areas that contained unprotected emergency diesel generator control cables and the permanent resolution were very good. However, interim corrective actions and risk assessments were deficient as a result of the operability determination not addressing the appropriate safety function. The unprotected emergency diesel generator control cables represented a failure to maintain the provisions of the Facility Operating License. This failure is a Severity Level IV violation which is being treated as a Non-Cited Violation consistent with Appendix C of the NRC Enforcement Policy. This violation is in PECO's corrective action program enhancement process (PEP) evaluation 10008924.
Dockets Discussed:						
05000352	LIMERICK 1					
05000353	LIMERICK 2					
03/01/1999	1999001	Pri: ENG	NRC	NEG	Pri: 5A Sec: 4B Ter:	PCIV Operator Issue The initial PECO evaluation of the mis-operation of the 2B core spray full flow test valve was narrowly focused. PECO evaluated the torque switch that failed, but did not initially consider other potential issues when a valve is operated in a manner to indicate closed, but is not fully closed. PECO engineers did not assess the effect on containment isolation or potential generic implications to other susceptible valves. Also, PECO did not identify that actions taken to address a similar event in 1993, were ineffective in that they relied on operator practices, which were not translated into procedures and had eroded over time. Appropriate analyses and corrective actions were implemented subsequent to discussion with the inspectors.
Dockets Discussed:						
05000352	LIMERICK 1					
05000353	LIMERICK 2					

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Date	Source	Functional Area	ID	Type	Template Codes	Item Title Item Description
01/11/1999	1998010	Pri: ENG	NRC	POS	Pri: 4B Sec: 5B Ter:	Fuel Monitoring Task Force PECO's efforts to confirm and replace the leaking fuel bundle on Unit-1 were excellent. The Fuel Monitoring Task Force (FMTF) developed an effective strategy to inspect the reactor fuel and verify the integrity of the core. The Team fully evaluated the foreign material found during the inspection. The recommendation for plant restart was based on a thorough review of available data by the vendor and licensee.
Dockets Discussed:						
05000352	LIMERICK 1					
05000353	LIMERICK 2					
01/11/1999	1998010	Pri: ENG	NRC	POS	Pri: 5C Sec: Ter:	Rosemounts Model 710 Master Trip Units PECO engineering promptly investigated and resolved the potential problem with Rosemount Model 710 master trip units at Limerick.
Dockets Discussed:						
05000352	LIMERICK 1					
05000353	LIMERICK 2					
11/30/1998	1998009-03	Pri: ENG	Licensee	NCV	Pri: 4A Sec: Ter:	Remote Shutdown Panel High Radiation Light Missed Surveillance LER 2-98-007 described a condition prohibited by Technical Specifications in which the surveillance test for the residual heat removal (RHR) heat exchanger discharge line high radiation indication light located on the Unit 2 remote shutdown panel (RSP) had been missed. The cause of the missed surveillance was the cancellation of the surveillance test, which tested the light, due to an inadequate review of a plant modification. This licensee identified issue is being treated as a Non-Cited Violation.
Dockets Discussed:						
05000352	LIMERICK 1					
05000353	LIMERICK 2					
10/17/1998	1998008	Pri: ENG	NRC	POS	Pri: 5A Sec: 5B Ter: 5C	Fuel Failure at Unit 1 PECO personnel responded well to quickly detect and suppress a fuel leak at Unit 1. The multi-disciplined fuel monitoring task force developed a strategy to locate and suppress the fuel leak prior to the initiation of further failure
Dockets Discussed:						
05000352	LIMERICK 1					
05000353	LIMERICK 2					
10/17/1998	1998008-03	Pri: ENG	Licensee	NCV	Pri: 4A Sec: Ter:	Potential containment bypass path resulting in a condition outside the design basis. Engineering personnel took prompt and effective corrective actions following their identification of a potential suppression chamber bypass path between the drywell and suppression pool air spaces due to postulated cable failures. This issue was an apparent violation of 10 CFR 50 Appendix B, Criterion Iii, "Design Control." However, in accordance with the NRC Enforcement Policy, Section VII.B.3, Violations Involving Old Design Issues, the NRC is exercising enforcement discretion and not citing this violation per EA letter 98503, dated November 23, 1998.
Dockets Discussed:						
05000352	LIMERICK 1					
05000353	LIMERICK 2					
10/17/1998	1998008-04	Pri: ENG	Licensee	NCV	Pri: 4A Sec: 5C Ter:	Failure to meet the maximum travel distance limitation for portable fire extinguishers. LER 50-352; 353/1-98-013 described the failure to meet the requirements for maximum travel distance limitation for portable fire extinguishers. The discrepancy was a result of PECO and Bechtel not adhering to the National Fire Protection Association 10-1975 code when the fire extinguishers were distributed during plant construction. Additionally, subsequent audits of the fire protection program had failed to identify the discrepancy. This licensee identified issue is being treated as a Non-Cited Violation.
Dockets Discussed:						
05000352	LIMERICK 1					
05000353	LIMERICK 2					

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Date	Source	Functional Area	ID	Type	Template Codes	Item Title Item Description
10/17/1998	1998008-05	Pri: ENG	Licensese	NCV	Pri: 4B Sec: 3A Ter:	Condition prohibited by TS due to an error in calibration of core spray line break differential pressure instrument LER 50-352; 353/1-98-015 described a condition prohibited by Technical Specifications due to an error in calibration of core spray line break differential pressure instruments. The error was a result of a faulty assumption in the setpoint calculation which did not account for the differential pressure between the two trains under normal conditions. This licensee identified issue is being treated as a Non-Cited Violation.
Dockets Discussed:						
05000352	LIMERICK 1					
05000353	LIMERICK 2					
10/17/1998	1998008-06	Pri: ENG	Licensese	NCV	Pri: 4A Sec: 5C Ter:	Failure of hatchway fire protection flow control valves to actuate. LER 50-352; 353/1-98-017 described a condition involving the inability of hatchway fire protection flow control valves to remain open when actuated. Additionally, the surveillance testing of these valves and previous corrective actions for other fire protection flow control valves were inadequate. This licensee identified violation of 10 CFR 50 Appendix B, Criterion III, Design Control is being treated as a Non-Cited Violation.
Dockets Discussed:						
05000352	LIMERICK 1					
05000353	LIMERICK 2					
10/17/1998	1998008-07	Pri: ENG	Licensese	NCV	Pri: 2A Sec: 4B Ter:	Three inoperable Barksdale Model C9622-3-B differential pressure switches result in two or more independent LER 50-353/2-98-001 described a condition prohibited by Technical Specifications involving three inoperable Barksdale model C9522-3-B differential pressure switches. This result in two independent trains of a single safety system being inoperable from a common cause. This event occurred as a result of inadequate margins to account for setpoint drift over a 24-month fuel cycle. This licensee identified issue is being treated as a Non-Cited Violation.
Dockets Discussed:						
05000352	LIMERICK 1					
05000353	LIMERICK 2					
05/24/1999	1999003	Pri: PLTSUP	NRC	POS	Pri: 1C Sec: Ter:	Security and Safeguards Staff Training and Qualification Security force personnel were being trained in accordance with the requirements of the Training and Qualification Plan, training documentation was properly maintained and accurate, and the training provided by the training staff was effective.
Dockets Discussed:						
05000352	LIMERICK 1					
05000353	LIMERICK 2					
05/24/1999	1999003	Pri: PLTSUP	NRC	POS	Pri: 1C Sec: Ter:	Security Organization and Administration The level of management support was adequate to ensure effective implementation of the security program, and was evidenced by adequate staffing levels and the allocation of resources to support programmatic needs.
Dockets Discussed:						
05000352	LIMERICK 1					
05000353	LIMERICK 2					
05/24/1999	1999003	Pri: PLTSUP	NRC	POS	Pri: 1C Sec: 3A Ter:	Conduct of Security and Safeguards Activities PECO was conducting security and safeguards activities in a manner that protected public health and safety in the areas of access authorization, alarm stations, communications, and protected area access control of personnel and packages. This portion of the program, as implemented, met the commitments and NRC requirements.
Dockets Discussed:						
05000352	LIMERICK 1					
05000353	LIMERICK 2					

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Date	Source	Functional Area	ID	Type	Template Codes	Item Title
05/24/1999	1999003	Pri: PLTSUP	NRC	POS	Pri: 1C Sec: 3A Ter:	Security and Safeguards Procedures and Documentation Security and safeguards procedures and documentation were being properly implemented. Event logs were being properly maintained and effectively used to analyze, track, and resolve safeguards events.
Dockets Discussed:						
05000352	LIMERICK 1					
05000353	LIMERICK 2					
05/24/1999	1999003	Pri: PLTSUP	NRC	POS	Pri: 1C Sec: 3A Ter:	Quality Assurance in Security and Safeguard Activities The review of PECO's Security and Safeguards audit program indicated that the audits were comprehensive in scope and depth, that findings were reported to the appropriate level of management, and that the program was being properly administered. In addition, a review of the documentation applicable to the self-assessment program indicated that the program was being effectively implemented to identify and resolve potential weakness.
Dockets Discussed:						
05000352	LIMERICK 1					
05000353	LIMERICK 2					
05/24/1999	1999003	Pri: PLTSUP	NRC	POS	Pri: 2A Sec: Ter:	Status of Security Facilities and Equipment PECO security facilities and equipment in the areas of protected area assessment aids, protected area detection aids, and personnel search equipment were determined to be well maintained and were able to meet the commitments and NRC requirements.
Dockets Discussed:						
05000352	LIMERICK 1					
05000353	LIMERICK 2					
05/24/1999	1999003	Pri: PLTSUP	NRC	POS	Pri: 3A Sec: 1C Ter:	Unit 2 Refuel Outage Radiological Controls Radiological controls for Limerick Unit 2 fifth refuel outage were effectively planned and implemented and focused on jobs with elevated exposure estimates.
Dockets Discussed:						
05000353	LIMERICK 2					
05/24/1999	1999003	Pri: PLTSUP	NRC	POS	Pri: 3A Sec: 3B Ter:	Security and Safeguards Staff Knowledge and Performance The security force members adequately demonstrated that they had the requisite knowledge necessary to effectively implement the duties and responsibilities associated with their position.
Dockets Discussed:						
05000352	LIMERICK 1					
05000353	LIMERICK 2					
05/24/1999	1999003	Pri: PLTSUP	NRC	POS	Pri: 3A Sec: 5A Ter: 5C	Quality Assurance in Radiological Protection and Chemistry Activities Self assessments and corrective action programs were effectively used. PECO identified, evaluated, and resolved radiological control issues as evidenced by the conduct of multiple self-assessments and audits to satisfy the radiation protection program review requirements.
Dockets Discussed:						
05000353	LIMERICK 2					

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Date	Source	Functional Area	ID	Type	Template Codes	Item Title	Item Description
04/12/1999	1999002	Pri: PLTSUP	NRC	NEG	Pri: 3A	Fire system impairment	PECO did not evaluate the use of rubber matting on scaffolds in the vicinity of a fire suppression system in a combustion free zone nor initiate a fire system impairment resulting in a degraded and uncompensated fire barrier. PECO promptly rectified the deficiency when informed by the inspector.
Dockets Discussed:							
050000352	LIMERICK 1	Sec:			Sec:		
050000353	LIMERICK 2				Ter:		
04/12/1999	1999002-05	Pri: PLTSUP	Licensee	NCV	Pri: 1C	Compromise of safeguards information.	LER 1-99-001 reported that less than adequate administrative controls caused safeguards information to be inappropriately saved to a computer's hard-drive. The safeguards information was left unprotected on the stand alone computer in the security office area. This Severity Level IV violation of security requirements is being treated as a Non-Cited Violation, consistent with Appendix C of the NRC Enforcement Policy. This violation is in PECO's corrective action program as PEP 10009463.
Dockets Discussed:							
050000352	LIMERICK 1	Sec:			Sec:		
050000353	LIMERICK 2				Ter:		
03/01/1999	1999001	Pri: PLTSUP	NRC	POS	Pri: 1C	Implementation of the Radiological Environmental Monitoring Program	The licensee's contractors effectively performed sample collection activities according to the procedures and sample schedule, conducted the land use census, and maintained and calibrated the automatic sampling equipment. The licensee provided program oversight and met the reporting requirements in the ODCM. The radiological environmental monitoring program was effectively implemented in accordance with regulatory requirements.
Dockets Discussed:							
050000352	LIMERICK 1	Sec:			Sec:		
050000353	LIMERICK 2				Ter:		
03/01/1999	1999001	Pri: PLTSUP	NRC	POS	Pri: 1C	Implementation of Meteorological Monitoring Program	Communication and inter-departmental coordination enhanced the licensee's overall performance. Instrument and Controls together with Health Physics Support calibrated and maintained the meteorological monitoring instrumentation, and improved instrument reliability. The self-assessment identified areas for improvement. The licensee appropriately addressed and corrected each issue. The meteorological monitoring program was effectively maintained and implemented in accordance with regulatory requirements.
Dockets Discussed:							
050000352	LIMERICK 1	Sec:			Sec:		
050000353	LIMERICK 2				Ter:		
03/01/1999	1999001	Pri: PLTSUP	NRC	POS	Pri: 1C	QA of Analytical Measurements	The environmental and quality assurance laboratories conducted the QA/QC programs in accordance with the appropriate procedures. The licensee provided effective program oversight by monitoring the progress and quality of both the environmental and the quality assurance laboratories. The quality assurance program was effectively maintained and implemented in accordance with regulatory requirements.
Dockets Discussed:							
050000352	LIMERICK 1	Sec:			Sec:		
050000353	LIMERICK 2				Ter:		
03/01/1999	1999001	Pri: PLTSUP	NRC	POS	Pri: 1C	Control of Fire Protection Activities	Effective administrative controls had been established for the hot-work that was accomplished in the skimmer surge tank pit. Proper storage of combustibles were in place. Good control of hot-work activities were evident.
Dockets Discussed:							
050000352	LIMERICK 1	Sec:			Sec:		
050000353	LIMERICK 2				Ter:		

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Date	Source	Functional Area	ID	Type	Template Codes	Item Title Item Description
03/01/1999	1999001	Pri: PLTSUP	NRC	POS	Pri: 1C	Facility Tour
<p>Dockets Discussed: 05000352 LIMERICK 1 05000353 LIMERICK 2</p> <p>Sec: The fire protection equipment conditions and housekeeping of the plant were good. The licensee maintained effective control of combustible materials. Roving fire watch personnel were knowledgeable of station procedures for reporting fires, roving fire watch duties, and responding to fires. Eight hour emergency light operation was good. Observed fire protection systems were capable of providing protection against fire and were consistent with the defense-in-depth principle.</p>						
03/01/1999	1999001	Pri: PLTSUP	NRC	POS	Pri: 1C	Walkdown of Safe Shutdown Methodologies
<p>Dockets Discussed: 05000352 LIMERICK 1 05000353 LIMERICK 2</p> <p>Sec: The pathways for safe shutdown activities performed by operators were generally illuminated in an acceptable manner, staged equipment needed by the operators was accounted for and adequately surveilled. Safe shutdown procedures were adequate to support safe shutdown activities of the plants.</p>						
03/01/1999	1999001	Pri: PLTSUP	NRC	POS	Pri: 1C	Fire Brigade Training
<p>Dockets Discussed: 05000352 LIMERICK 1 05000353 LIMERICK 2</p> <p>Sec: The brigade members were current on all required training and annual physical examinations and the training program met NRC requirements.</p>						
03/01/1999	1999001	Pri: PLTSUP	NRC	POS	Pri: 1C	Audits and Surveillances
<p>Dockets Discussed: 05000352 LIMERICK 1 05000353 LIMERICK 2</p> <p>Sec: The fire protection quality assurance audit appropriately reviewed fire protection program attributes and compliance with program requirements. The fire protection audit findings were appropriately addressed and timely corrective actions had been taken for identified deficiencies.</p>						
01/11/1999	1998010-01	Pri: PLTSUP	NRC	NCV	Pri: 3A	Unescorted Access Erroneously Granted to a Contract Employee
<p>Dockets Discussed: 05000352 LIMERICK 1 05000353 LIMERICK 2</p> <p>Sec: LER 1-98-019 addressed an administrative error that granted unescorted access to a contract employee who had tampered with a drug test specimen. The failure to properly control access, in this instance, is a violation of the Limerick Physical Security Plan. This licensee-identified and corrected issue was treated as a Non-Cited Violation.</p>						
11/30/1998	1998009	Pri: PLTSUP	NRC	NEG	Pri: 1C	Spent Fuel Cask Receipt Inspection
<p>Dockets Discussed: 05000352 LIMERICK 1 05000353 LIMERICK 2</p> <p>Sec: Radiological controls during the spent fuel cask loading activities were generally good. However, health physics technicians failed to recognize and correct poor work practices performed by nuclear maintenance division workers until they were prompted by the inspector on several occasions. Although the licensee addressed these practices with the individuals, they did not capture the radiation worker performance and HP oversight deficiencies in their self assessment or in their corrective action system.</p>						

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Date	Source	Functional Area	ID	Type	Template Codes	Item Title Item Description
11/30/1998	1998009	Pri: PLTSUP	NRC	POS	Pri: 1C	Spent Fuel Cask Receipt Inspection
Dockets Discussed:						
05000352	LIMERICK 1	Sec:			Sec:	During receipt inspection of an empty spent fuel cask, the licensee properly identified that external radiation levels were above regulatory limits and notified the shipper in accordance with regulatory requirements.
05000353	LIMERICK 2	Ter:			Ter:	
10/17/1998	1998008	Pri: PLTSUP	NRC	NEG	Pri: 1C	RCA Material Monitoring
Dockets Discussed:						
05000352	LIMERICK 1	Sec:			Sec:	Monitoring of material exiting the radiological controlled area was not always conducted at the low sensitivities specified by station procedure.
05000353	LIMERICK 2	Ter:			Ter:	
10/17/1998	1998008	Pri: PLTSUP	NRC	POS	Pri: 1C	Conduct of Security and Safeguards Activities
Dockets Discussed:						
05000352	LIMERICK 1	Sec:			Sec:	The licensee was conducting security and safeguards activities in a manner that protected public health and safety in the areas of alarm stations, communications, protected area access control of personnel and packages. This portion of the program as implemented, met the licensee's commitments and NRC requirements.
05000353	LIMERICK 2	Ter:			Ter:	
10/17/1998	1998008	Pri: PLTSUP	NRC	POS	Pri: 1C	Status of Security Facilities & Equipment
Dockets Discussed:						
05000352	LIMERICK 1	Sec:			Sec:	The licensee's security facilities and equipment in the areas of protected area assessment aids, protected area detection aids, and personnel, search equipment were determined to be well maintained and reliable and were able to meet the licensee's commitments and NRC requirements.
05000353	LIMERICK 2	Ter:			Ter:	
10/17/1998	1998008	Pri: PLTSUP	NRC	POS	Pri: 1C	Security & Safeguards Procedures & Documentation
Dockets Discussed:						
05000352	LIMERICK 1	Sec:			Sec:	Security and safeguards procedures and documentation were being properly implemented. Event Logs were being properly maintained and effectively used to analyze, track, and resolve safeguards events.
05000353	LIMERICK 2	Ter:			Ter:	
10/17/1998	1998008	Pri: PLTSUP	NRC	POS	Pri: 1C	Solid Radwaste Processing
Dockets Discussed:						
05000352	LIMERICK 1	Sec:			Sec:	Limerick solid radioactive wastes were effectively sampled, packaged, and dewatered with respect to requirements. The radwaste staff is pursuing an enhancement to the program to more accurately quantify the condensate filtrate waste volumes.
05000353	LIMERICK 2	Ter:			Ter:	

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Date	Source	Functional Area	ID	Type	Template Codes	Item Title Item Description
10/17/1998	1998008	Pri: P_TSUP	NRC	POS	Pri: 1C	Radioactive Material Shipping Radioactive material shipments were prepared in an expeditious manner and met all regulatory requirements. Shipping records were properly prepared with no deficiencies identified.
Dockets Discussed:						
05000352	LIMERICK 1	Sec:			Sec:	
05000353	LIMERICK 2	Ter:			Ter:	
10/17/1998	1998008	Pri: PLTSUP	NRC	POS	Pri: 1C	Solid Radioactive Waste Storage The licensee has effectively minimized the amount of contaminated equipment and radioactive wastes stored onsite.
Dockets Discussed:						
05000352	LIMERICK 1	Sec:			Sec:	
05000353	LIMERICK 2	Ter:			Ter:	
10/17/1998	1998008	Pri: PLTSUP	NRC	POS	Pri: 1C	Radioactive Mat. Ship. Procedures Limerick radioactive waste processing and radioactive material shipping procedures were of good quality and effectively implemented regulatory requirements.
Dockets Discussed:						
05000352	LIMERICK 1	Sec:			Sec:	
05000353	LIMERICK 2	Ter:			Ter:	
10/17/1998	1998008	Pri: PLTSUP	NRC	POS	Pri: 1C	Radioactive Mat. Ship. Training All authorized radioactive material shipment personnel have met the applicable DOT and NRC training requirements.
Dockets Discussed:						
05000352	LIMERICK 1	Sec:			Sec:	
05000353	LIMERICK 2	Ter:			Ter:	
10/17/1998	1998008	Pri: PLTSUP	NRC	POS	Pri: 1C	Radioactive Mat. Ship. QA Oversight Quality assurance oversight of the radioactive material shipment program was effective through performance of an independent program assessment and surveillances and through radwaste staff shipment verifications.
Dockets Discussed:						
05000352	LIMERICK 1	Sec:			Sec:	
05000353	LIMERICK 2	Ter:			Ter:	
10/17/1998	1998008	Pri: PLTSUP	NRC	POS	Pri: 1C	Security/Safeguards Staff Training/Qualification Security force personnel were being trained in accordance with the requirements of the T&Q Plan. Training documentation was properly maintained and accurate and the training provided by the training staff was effective. (This item was inadvertently left out of the Executive Summary of the inspection report.)
Dockets Discussed:						
05000352	LIMERICK 1	Sec:			Sec:	
05000353	LIMERICK 2	Ter:			Ter:	

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Date	Source	Functional Area	ID	Type	Template Codes	Item Title	Item Description
10/17/1998	1998008	Pri: PLTSUP Sec:	NRC	POS	Pri: 1C Sec: Ter:	Security Org. and Admin.	The level of management support was adequate to ensure effective implementation of the security program, and was evidenced by the allocation of resources to support programmatic needs. (This item was inadvertently left out of the Executive Summary of the inspection report.)
Dockets Discussed:							
05000352	LIMERICK 1						
05000353	LIMERICK 2						
10/17/1998	1998008	Pri: PLTSUP Sec:	NRC	POS	Pri: 3B Sec: Ter:	Security/Safeguards Staff Knowledge & Performance	The security force members adequately demonstrated that they had the requisite knowledge necessary to implement the duties and responsibilities associated with their position.
Dockets Discussed:							
05000352	LIMERICK 1						
05000353	LIMERICK 2						

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Legend

Type Codes:

BU	Bulletin
CDR	Construction
DEV	Deviation
E EI	Escalated Enforcement Item
IFI	Inspector follow-up item
LER	Licensee Event Report
LIC	Licensing Issue
MISC	Miscellaneous
MV	Minor Violation
NCV	Non-Cited Violation
NEG	Negative
NOED	Notice of Enforcement Discretion
NON	Notice of Non-Conformance
OTHR	Other
P21	Part 21
POS	Positive
SGI	Safeguard Event Report
STR	Strength
URI	Unresolved item
VIO	Violation
WK	Weakness

Template Codes:

1A	Normal Operations
1B	Operations During Transients
1C	Programs and Processes
2A	Equipment Condition
2B	Programs and Processes
3A	Work Performance
3B	KSA
3C	Work Environment
4A	Design
4B	Engineering Support
4C	Programs and Processes
5A	Identification
5B	Analysis
5C	Resolution

ID Codes:

NRC	NRC
Self	Self-Revealed
Licensee	Licensee

Functional Areas:

OPS	Operations
MAINT	Maintenance
ENG	Engineering
PLTSUP	Plant Support
OTHER	Other

EEIs are apparent violations of NRC Requirements that are being considered for escalated enforcement action in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Action" (Enforcement Policy), NUREG-1600. However, the NRC has not reached its final enforcement decision on the issues identified by the EEIs and the PIM entries may be modified when the final decisions are made.

URIs are unresolved items about which more information is required to determine whether the issue is an acceptable item, a deviation, a nonconformance, or a violation. A URI may also be a potential violation that is not likely to be considered for escalated enforcement action. However, the NRC has not reached its final conclusions on the issues, and the PIM entries may be modified when the final conclusions are made.

Inspection / Activity Plan
10/01/1999 - 03/31/2000

Units	Inspection Activity	Title	Number of NRC Inspectors / Individuals	Planned Dates Start	Planned Dates End	Inspection Type
1, 2	IP 81110	Operational Safeguards Response Evaluation (OSRE)	3	09/27/1999	10/01/1999	Regional Initiative
1, 2	IP 83750	Occupational Radiation Exposure	1	10/04/1999	10/08/1999	Core
1, 2	IP 84750	Radioactive Waste Treatment, And Effluent And Environmental Monitoring	1	10/04/1999	10/08/1999	Core
1, 2	IP 71001	Licensed Operator Requalification Program Evaluation	2	10/18/1999	10/22/1999	Core
1, 2	IP 86750	Solid Radioactive Waste Management And Transportation Of Radioactive Material	2	01/03/2000	01/07/2000	Core
1, 2	IP 37001	10 CFR 50.59 Safety Evaluation Program	2	02/07/2000	02/11/2000	Core
1, 2	IP 37550	Engineering	2	02/07/2000	02/11/2000	Core
1, 2	IP 37001	10 CFR 50.59 Safety Evaluation Program	2	02/21/2000	02/25/2000	Core
1, 2	IP 37550	Engineering	2	02/21/2000	02/25/2000	Core