

PHILADELPHIA ELECTRIC COMPANY

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V. S. BOYER
VICE-PRESIDENT

(215) 841-4500

Mr. Boyce Grier, Director
United States Nuclear Regulatory Commission
Office of Inspection and Enforcement, Region I
631 Park Avenue
King of Prussia, PA 19406

SEP 17 1979

Subject: USNRC IE Regi I Letter dated August 22, 1979
RE: Site and Office Inspection of May 7-11, 17, 18,
and 21, 1979
Inspection Report No. 50-352/79-05 and 50-353/79-05
Limerick Generating Station - Units 1 & 2
File: QUAL 1-2-2 (352/79-05 and 353/79-05)

Dear Mr. Grier:

In response to the subject letter regarding items identified during the subject inspection of construction activities authorized by NRC License Nos. CPPR-106 and -107, we transmit herewith the following:

Attachment I - Response to Appendix A

Should you have any questions concerning these items, we would be pleased to discuss them with you.

Sincerely,

V. S. Boyer

V. S. Boyer

JMC/mmk
Attachment

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Attachment I

Response to Appendix A

Item of Noncompliance

Infraction

10CFR 50, Appendix B, Criteria V, states, in part, that: "Activities affecting quality shall be prescribed by documented instructions, procedures or drawings... and shall be accomplished in accordance with these instructions, procedures or drawings."

The Limerick PSAR, Appendix D, Quality Assurance Program, Paragraph D.4.10 states in part, that the subcontractor "...shall have written procedures governing the identification, control, and disposition of materials, parts, or equipment that do not meet specification requirements. Repairs shall be in accordance with documented instructions."

The Supplier Deviation Disposition Request for Reactor Building #1 longitudinal tendon slippages, SDDR number L-12 Revision 3, January 29, 1979, states in part in Procedure (Item 3) for Rework of Slipped Strand, "Stress the strand to the required dead-end anchor force. A higher gage reading may be necessary to unseat and replace wedges. Record elongation and force..."

Contrary to the above, as of May 9, 1979, the elongation and force used to rework each of the slipped strands for stage 1 longitudinal tendons of the north and south fuel pool girders were not documented.

Response to Infraction

A review of the existing documentation determined that documenting the elongation and force of the reworked strands is not essential to the stressing operation and adequate documentation does exist to verify that the strands were satisfactorily reworked. Therefore, the procedure has been revised to no longer require the documentation of the elongation and force.

To preclude recurrence of similar type problems, we have reviewed the subcontractor's procedures and have determined that the forms currently provide adequate space for reporting information required by the procedures. In addition, the subcontractor's personnel have been reminded to pay close attention to the documentation recording requirements of their procedures.

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