

PHILADELPHIA ELECTRIC COMPANY

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V. S. BOYER
VICE-PRESIDENT

MAY - 3 1979

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

Subject: USMRC IE Region I Letter dated April 6, 1979
RE: Site and Office Inspection of February 20-23,
1979
Inspection Report No. 50-352/79-02 & 50-353/79-02
Limerick Generating Station - Units 1 & 2
File: QUAL 1-2-2 (352/79-02 and 353/79-02)

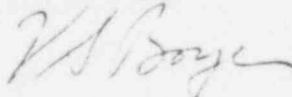
Dear Mr. Grier:

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

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Attachment I

Response to Appendix A

Item of Noncompliance I

Infraction

Appendix B of 10CFR50, Criterion V, states, in part: "Activities affecting quality... shall be accomplished in accordance with these instructions, procedures or drawings."

The Limerick PSAR, Appendix D, Quality Assurance Program, Paragraph D.6.4, states, in part: "Bechtel Construction Department... is responsible for construction of the plant to approve engineering specifications, drawing and procedures..."

Bechtel Drawing C-603, Revision 26, Note 10, describes the requirements for replacement anchor holes, as follows:

"Abandoned holes requiring replacement shall be filled with Dry-Pack mortar of a strength equal to or greater than the drilled member. New holes shall be drilled no closer than one hole diameter, measured center to center from the filled hole, after the mortar has reached the strength of the original concrete."

Contrary to the above, on February 20, 1979, the craftsman was drilling a replacement hole for an anchor bolt in the RHR room "A" which was less than one hole diameter away from the abandoned hole and also the abandoned hole was not filled with mortar.

Response to Infraction

The abandoned and replacement holes identified by the item of noncompliance have been filled with dry pack mortar and replaced by another hole in accordance with the requirements of drawing C-603, Note 10.

Corrective steps taken and being taken to avoid further items of noncompliance are:

1. Verbal instruction of supervisory personnel to inform crafts personnel of the requirements of Note 10 and to inspect to ensure that the requirements are followed.
2. Issuance of a memorandum by the Project Field Engineer to Field Supervision and Engineering to reiterate item (1) above.

3. Job Rule G-28 for "Installation of Expansion Anchors and Grouted in Threaded Rods" will be revised to reference Note 10. This revision will be complete by May 7, 1979.

Item of Noncompliance II

Infraction

Appendix B of 10CFR50, Criterion V, states, in part: "Activities affecting quality... shall be accomplished in accordance with these instructions, procedures or drawings."

The Limerick PSAR, Appendix D, Quality Assurance Program, Paragraph D.6.4, states, in part: "Bechtel Construction Department... is responsible for construction of the plant to approve engineering specifications, drawings and procedures..."

Bechtel Power Corporation Job Rule for Storage Maintenance of Fabricated Piping and In-Place Storage Maintenance of Small Manual Valves, Revision 14, Paragraph 4.2, states, in part: "Austenitic stainless steel pipe spools shall be laid down in locations not subject to rain, snow, sleet... shall be covered... and on dunnage. Closed end caps with plastic bags and wood plugs... shall remain in place and only be removed while work is in progress..."

Contrary to the above, on February 21, 1979, stainless steel pipe spools DCA-105-1-2 and DCA-105-1-4 were observed uncovered and uncapped in the "H" out door laydown area.

Response to Infraction

Stainless steel pipe spools DCA-105-1-2 and DCA-105-1-4 have been wrapped with polyethylene with end caps and transferred indoors.

Corrective steps taken and being taken to avoid further items of noncompliance are:

1. All personnel have been verbally re-informed of the proper storage conditions of stainless steel pipe spools.
2. A complete survey of the laydown area is in progress and corrective action is being taken as necessary to insure proper storage of all stainless steel pipe.

Full compliance will be achieved by June 1, 1979.

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