



PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-4502

July 17, 1981

JOHN S. KEMPER
VICE-PRESIDENT
ENGINEERING AND RESEARCH

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: US NRC IE Region Letter dated January 21, 1981
RE: Site Inspection of December 4-31, 1980
Inspection Report No. 50-352/80-21 & 353/80-19
Limerick Generating Station - Units 1 and 2
References: a) J. S. Kemper (PECO) Letter to B. Grier, dated 2/13/81
b) PECO/NRC Meeting of June 18, 1981
File: QUAL 1-2-2 (352/80-21 & 353/80-19)

Dear Mr. Grier:

As agreed to in the referenced Meeting, we transmit herewith:

Attachment I - Supplementary Response to Appendix A

Also enclosed as required by the Notice of Violation, is an affidavit relating to the response.

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

Sincerely,

JMC/rmk
Attachment

Copy to: Director of Inspection and Enforcement
United States Nuclear Regulatory Commission
Washington, D. C. 20555

J. P. Durr, US NRC Resident Inspector

8108040245 810727
PDR ADDCK 05000352
Q PDR

COMMONWEALTH OF PENNSYLVANIA :

SS.

COUNTY OF PHILADELPHIA :

JOHN S. KEMPER, being first duly sworn, deposes
and says:

That he is Vice President of Philadelphia Electric Company,
the holder of Construction Permits CPPR-106 and CPPR-107 for Limerick
Generating Station Units 1 and 2; that he has read the foregoing
Supplementary Response to Inspection Report No. 50-352/80-21 and
50-353/80-19 and knows the contents thereof; and that the statements
and matters set forth therein are true and correct to the best of his
knowledge, information and belief.

John S. Kemper

Subscribed and sworn to
before me this 17th day
of July, 1981

Wendell H. Boyer
Notary Public
WENDELL H. BOYER
Notary Public, Phila., Phila. Co.
My Commission Expires Jan. 30, 1982

ATTACHMENT I

SUPPLEMENTARY RESPONSE TO APPENDIX A

In addition to our initial response, we submit the following.

The criteria that have been used by the Lead Level II Welding Quality Control Engineer for establishing ASME weld joint fit-up inspection and surveillance are:

1. All ASME Class 1, 2, and 3 closure spools shall be inspected for fit-up.
2. All NSSS ASME Class 1 pipe and valves shall be inspected for fit-up.
3. All containment flued head penetrations shall be inspected for fit-up.
4. Including the above, a minimum of 10% of the ASME pipe weld fit-up are designated for inspection.
5. The other pipe weld fit-ups are designated for surveillance. Surveillance is conducted on approximately 10% of welding activities including fit-ups.
6. The percentage of ASME pipe weld fit-up inspections shall be increased based on feedback from In-Process Rework Notices or Nonconformance Reports described herein.

The foregoing have been issued as formal instructions for use by the Lead Level II Welding Quality Control Engineer.

In order to obtain documented feedback In-Process Rework Notices are being issued whenever a Quality Control engineer identifies fit-up misalignment or improper gap. Each In-Process Rework Notice of Nonconformance Report is reviewed by the Lead Level II Welding Quality Control Engineer. If during the course of any day, a total of two (2) or more In-process Rework Notices or Nonconformance Reports relating to unacceptable conditions are identified at fit-up, the designated inspections shall increase from a 10% to a minimum of 20%. Inspections shall continue at that rate until the day no In-Process Rework Notices on unacceptable conditions identified at fit-up are issued at which time the inspection rate shall return to 10%. This is a new requirement made effective on June 14, 1981.

I-1/2
50-352/80-21
50-353/80-19

Surveillances are performed on ASME welding activities including pipe weld fit-ups, purge gas, pre heat and interpass temperatures. These activities provide an additional degree of assurance that an acceptable completed weld will be obtained with a consequent reduction in weld rejects.

The determination of when or where surveillances will be performed, and the nature of these surveillances is made by consideration of a number of factors including but not limited to the following:

- 1) Supervision shifting the pipefitter crews.
- 2) Special Weld Procedures
- 3) Increased Rejection Rate: when rejects increase, changes in surveillance shall consider:
 - a) If the increased rejection rate is from one area only.
 - b) If the increased rejection rate is for one fit-up configuration (i.e., backing ring).
 - c) If the increased rejection rate includes all types of fit-ups.

Since this weld inspection program was instituted in June 1979, our records indicate a substantial reduction in reject rates. The radiographic reject rate for 1973 through June 1, 1979 was 17.6% of welds and 1.95% lineal inches, respectively. However, the reject rate from June 1979 through May 1981 was 8.2% for welds and .67% for lineal inches.