



PHILADELPHIA ELECTRIC COMPANY

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JOHN S. KEMPER
VICE PRESIDENT
ENGINEERING AND RESEARCH

AUG 5 - 1981

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: USNRC IE Region Letter dated July 15, 1981
RE: Site Inspection of June 15-30, 1981
Inspection Report Nos. 50-352/81-10 & 50-353/81-08
Limerick Generating Station - Units 1 and 2

File: QUAL 1-2-2 (352/81-10 & 353/81-08)

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

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,

JPE/gra
Attachment

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

J. P. Durr, USNRC Resident Inspector

8108210395 810817
PDR ADOCK 05000352
Q PDR

ATTACHMENT I

Response to Appendix A

Violation

10CFR50, Appendix B, Criterion III, states, in part: "Measures shall be established to assure that applicable regulatory requirements and design basis...for those structures, systems, and components to which this appendix applies are currently translated into specifications, drawings, procedures, and instructions."

The Limerick PSAR, Appendix A.3.1, states, in part: "The equipment and piping considered as Class I Seismic...is as follows: q...RHR Service Water System...Class I Seismic equipment is examined to assure its ability to withstand seismic requirements..."

Specification P-300, "Specification for Piping Materials and Instrument Piping Standards," and P-401, "Design Criteria for Design and Documentation of Pipe Supports, Hangers, and restraints for Piping 2½" and Larger," require that the RHR Service Water Pipe Support HBC-182-H1 be designed and installed as Seismic Category I.

Contrary to the above, on June 25, 1981, Item 7, a 3/4" x 5-3/4" x 1' 8" stiffener plate on Drawing HBC-182-H1, in the RHR Service Water System, was identified as being attached for support to a ledge angle, defined as not safety related by the Project Q-list, Page C-2, Item 6.

Response to Violation

The drawing for hanger HBC-182-H1 will be revised and the hanger reworked to provide a stiffener which does not require the use of the ledge angle for a structural connection.

A review is being conducted on all other similar pipe hangers to determine if a similar situation exists. This review will be completed by 10/1/81 and any rework which is necessary will be completed by 3/30/82.

The other hanger configurations which use stiffeners installed perpendicular to the web, (not parallel as in the instance of the stiffener for hanger HBC-182-H1), appear to be acceptable with or without the welded connection to the ledge angle. The review and evaluation remains to be completed on each hanger to be sure this is the case on all hangers.

To prevent recurrence of this on future hanger design and redesign, a memorandum has been issued to designers to be aware of avoiding the use of non-seismically designed supports for connections of seismically design equipment.

*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 Response to Inspection Report
Nos. 50-352/81-10 and 50-353/81-08 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 5th day

of August, 1981

Elizabeth H. Boyer
Notary Public

ELIZABETH H. BOYER
Notary Public, Phila., Phila. Co.
My Commission Expires Jan. 30, 1982