



## PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-4502

JOHN S. KEMPER  
VICE PRESIDENT  
ENGINEERING AND RESEARCH

MAY 6 - 1982

Mr. Ronald C. Haynes, 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 April 6, 1982  
RE: Site Inspection of March 1-30, 1982  
Inspection Report No. 50-352/82-05 & 50-353/82-04  
Limerick Generating Station - Units 1 & 2  
File: QUAL 1-2-2 (352/82-05 and 353/82-04)

Dear Mr. Haynes:

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/drd  
Attachment

Copy to: Director of Inspection and Enforcement  
United States Nuclear Regulatory Commission  
Washington, D.C. 20555  
J. P. Durr, USNRC Resident Inspector

COMMONWEALTH OF PENNSYLVANIA :  
COUNTY OF PHILADELPHIA : ss

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  
No. 50-352/82-05 and 50-353/82-04 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 6<sup>th</sup> day  
of May, 1982

Patricia D. Scholl  
Notary Public

PATRICIA D. SCHOLL  
Notary Public, Philadelphia, Frank & John Co.  
My Commission Expires February 10, 1986

## ATTACHMENT I

### Response to Appendix A

#### Violation

A.1

10CFR50 Appendix B Criterion V requires that activities affecting quality be carried out in accordance with instructions and procedures. Bechtel Nuclear Quality Assurance Manual Section 3.2 states that design changes shall be initiated and controlled in accordance with written procedures. Bechtel Interoffice Memorandum, EIP10M-6, Revision 7, paragraph 4.1, directs that drawing change notices be used to transmit drawing changes for field action.

Contrary to the above, EMF's (Engineering Memoranda for Field) 6798, 6945, 7086, and 7151 were used to initiate design changes for the recirculation pump snubber embeds to the reactor pressure vessel pedestal during the October 27, 1981 to February 18, 1982 period, thereby bypassing prescribed design change controls.

#### Response

Due to heavy concentration of rebars, penetrations and structural steel embeds in the RPV pedestal in the areas allocated for the snubber supports, and to determine the final location, number and size of bolts to be used, Field was instructed by means of EMF's to conduct an exploratory survey based on preliminary design by excavating concrete to locate rebars and to drill holes to determine the size and depth of holes without damaging critical rebars and other embeds.

Upon completion of the exploratory work, Dwg. C-968, Rev. 1, was issued to incorporate the final design to include the as-built condition. Any rebars cut or damaged during the exploratory work were evaluated for structural adequacy and were documented per Specification 8031-C-105 on FSK-C-988.

All group supervisors and Assistant Project Engineers have been instructed by memo from W. C. McDaniel dated 3/19/82, to avoid the use of EMF's to make design changes. When under exceptional circumstances EMF's are used to meet construction requirements, such EMF's shall be converted to Field Change Notices (FCN) by the Field and attached to the design drawings prior to proceeding with actual work. Engineering will identify on these EMF's that an FCN is required in the Action Items Block.

A review of selected EMF's issued for changes to design found that the design changes had been incorporated into the appropriate documents.

I 2/3  
352 82-05  
353 82-04

## ATTACHMENT I

### Response to Appendix A

#### Violation

- A.2 10CFR50 Appendix B Criterion V requires that activities affecting quality be accomplished in accordance with specifications and drawings. Bechtel Drawing E-1412, Wire and Cable Notes and Details, paragraph 1.20, directs that the tray flanges be softened on the inner and outer edges where cable exits over the side rails.

Contrary to the above, on and before March 23, 1982, cables exiting over the side rails of safety-related cable trays 1BTLA99, 1ATXA99, 1ACZA04, and 1ACYC01 did not have flange edge softeners on the inner and outer edges.

#### Response

The Bechtel Drawing E-1412 has been revised since there is no need for edge softeners where the cables exit the trays. There are two (2) reasons for this: 1) The cable tray used at Limerick has rounded edges, and 2) Cables that are routed in cable trays are jacketed, which by design provides protection of the cable insulation.

Besides the deletion, the drawing was revised to add the requirements for softeners over tray hanger hardware and other defined sharp edges. The plant was reinspected and reworked where necessary to meet the new drawing requirement.

The action taken has eliminated the possibility of a recurrence of this specific item. It is our opinion that this item was identified twice by the NRC, due to the fact that the craftsmen and inspectors recognized that the softeners were unnecessary. Hence, the drawing requirement was not given adequate consideration.

To prevent similar recurrences, training sessions were given to construction supervision personnel and to inspectors. Additionally, management action taken this time regarding tray softeners was to have the electricians sign that they are now aware of softener requirements.